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 STATE OF UTAH
 NATURAL RESOURCES
 Wildlife Resources

*orig mine file
 made for Brayton
 File Act/007/019 #2*
 Norman H. Bangerter, Governor
 Dee C. Hansen, Executive Director
 William H. Geer, Division Director

1596 West North Temple • Salt Lake City, UT 84116-3154 • 801-533-9333

October 19, 1988

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DIVISION OF
 OIL, GAS & MINING

Dr. Dianne R. Nielson, Director
 Utah Division of Oil, Gas & Mining
 355 West North Temple
 3 Triad Center, Suite 350
 Salt Lake City, Utah 84180-1203

Attention: Susan Linner

Dear Dianne:

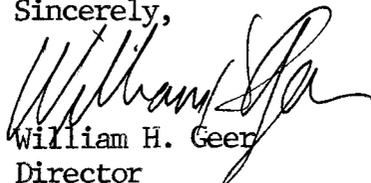
The Division has reviewed Andalex Resources' Inc. new Mine and Reclamation permit (MRP) application for addition of a 560 acre lease area to their Centennial project. The following is offered for your consideration.

As you know, access to this lease will be via the existing Pinnacle Mine. No new surface facilities will be necessary. Our primary concern for coal mining in this lease relates to the impacts of subsidence on wildlife. The MRP needs to discuss this issue relative to raptor nests. The wildlife map does not show all raptor nests as identified in May, 1988.

Dianne, the fish and wildlife resource information presented between pages 62 and 67 is vague and inaccurate. The project area is likely inhabited by as many as 184 species of wildlife (no fish, 3 amphibian, 15 reptilian, 106 avian and 60 mammalian species). Detailed and adequate information on these species was provided to the company April 13, 1981. Raptor data was updated May 10, 1988. This should be referenced or become part of the MRP.

Thank you for an opportunity to provide comment.

Sincerely,


 William H. Geer
 Director