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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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May 21, 1998

Mike Glasson, Sr. Geologist
Andalex Resources
6750 Airport Road
Price, UT 84501

Re: Mathis Lease and Addition of 1,183 Acres of Coal Lands, Andalex Resources, Inc., Centennial Mine, ACT/007/019-98A, File #3, Carbon County, Utah

Dear Mr. Glasson:

The Division has conducted an initial review of your application dated May 6, 1998 and entitled Mathis Lease. Addition of 1,183 acres to the Centennial Mine would be considered a significant revision to the permit and we are processing it as such. The information submitted in the application is not sufficient to determine it to be administratively complete. Therefore we are returning it to you for further development if you so desire.

The following list of items identifies some of the administrative holes in the application:

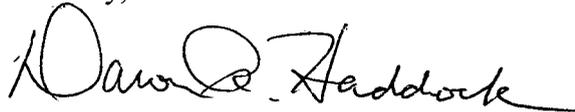
1. The application needs to show whether any land is the proposed addition to the permit area has prime farmland.
2. The cover letter says, "... it is our intention to undertake an in-depth hydrologic survey as soon as weather conditions allow." The Division needs this baseline information before it can begin its review. Normally, two years of data are required to show seasonal fluctuations. The applicant also needs to evaluate potential effects of mining on hydrologic resources.
3. Maps need to show adequate adjacent areas to allow the Division to evaluate potential effects of mining to those areas. The maps submitted with the application barely show the entire area proposed to be added to the permit area. In addition, it appears information other than the permit area boundary may not have been added to some maps, such as the wildlife and surface geology maps. On the surface geology map, for example, it seems unlikely the only exposed formation in the northern part of the proposed permit area is the Wasatch Formation.
4. It is impossible to tell from the land ownership maps who owns some land adjacent to the proposed permit area.
5. There is no additional vegetation or soils information. While the requirements for these sections of the regulations may not be extensive, the applicant has not addressed the requirements.

6. Wildlife information needs to be updated. Plate 34 which shows wildlife information is not current. The plateau above the mine contains critical deer and elk fawning and calving areas, and there are raptors using the area, probably for nesting.
7. The Division has allowed the right of entry portion of a mine plan application to be considered administratively complete on the basis of an application being filed with the Bureau of Land Management. To do this, Andalex should provide evidence the application has been filed.
8. Because this is a significant revision where the Division would need to issue a new permit, updated ownership and control and violation information are required.
9. The application includes no new cultural resources information.

We have not conducted a technical review of the application and there are likely other technical problems with the application that have not been identified.

If you have any questions, please call.

Sincerely,



Daron R. Haddock
Permit Supervisor

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Enclosure

cc: Price Field Office

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