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

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February 27, 2003

Michael Glasson, Environmental Coordinator
Andalex Resources, Inc.
P.O. Box 902
Price, Utah 84501

Re: Conditional Approval of Permit Area Vegetation Map, Andalex Resources, Inc.,
Centennial Project, C/007/019-AM03A, Outgoing File

Dear Mr. Glasson:

Plate 19A, Vegetation Map for the permit area is conditionally approved, upon receipt of one additional copy for incorporation. Please submit this copy by March 21, 2003. Once this copy is received, final approval will be granted. A stamped incorporated copy of the approved map will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan.

Enclosed is the Division's Technical Analysis of the map. In the course of this review it was noted that the last evaluation on record for the three vegetation reference areas was in 1987. Please arrange for an evaluation of the productivity of these reference areas during the 2003 field season.

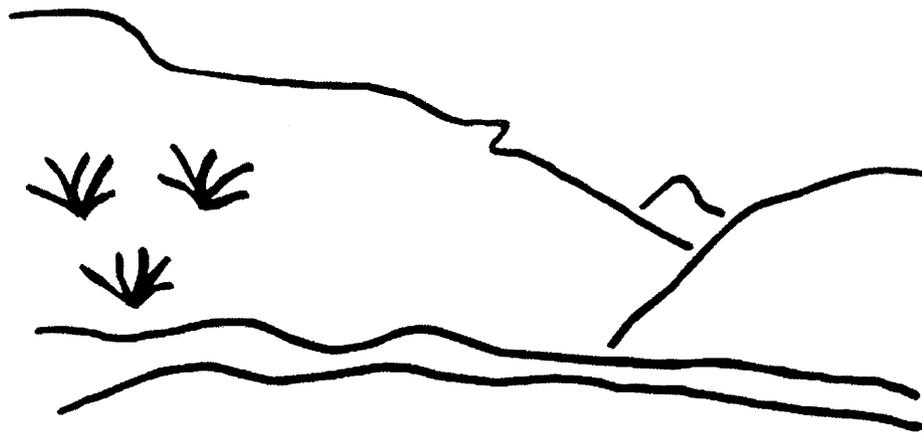
If you have any questions, please call Priscilla Burton (801) 538-5288 or me at (801) 538-5268.

Sincerely,

for
Pamela Grubaugh-Littig
Permit Supervisor

Enclosure
cc: Price Field Office
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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Centennial Project Mine
Permit Area Vegetation Map
C/007/019-AM03A
Technical Analysis
February 25, 2003

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TECHNICAL ANALYSIS

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The Division ensures compliance with the Surface Mining Control and Reclamation Act of 1977 (SMCRA). When an Applicant or Permittee submits a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the Permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.

INTRODUCTION

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The vegetation resource map currently in the MRP addresses only the vegetation in the Disturbed Area and three reference areas. The information is supported by a survey in Appendix M and is adequate to classify the vegetation in the disturbed area.

The Technical Analysis of the Mathis Tract Incidental Boundary Change dated May 15, 2002 concluded that a vegetation map of the entire permit area and adjacent areas on a scale of 1:6,000 or larger was needed. Consequently, in the Mining and Reclamation Plan (page 3-1), the applicant made a commitment to create a permit area vegetation map. The map was to be created using aerial photography, with fieldwork conducted as a means of verification.

A vegetation map meeting these requirements has been provided to the Division.

In the course of this review it was noted that the last evaluation on record for the three reference areas was in 1987.

INTRODUCTION

ENVIRONMENTAL RESOURCE INFORMATION

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

VEGETATION RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.19; R645-301-320.

Analysis:

This amendment to the MRP supplies Vegetation Map Plate 19A of the entire permit area and adjacent areas on a scale of 1:12,000. Plate 19A is based upon aerial photographs dated September 1987 with limited ground checking. Plate 19A shows six plant communities in the permit area: Conifer, aspen, sagebrush-grass, oak brush, mountain brush and pinyon-juniper. Although there are no Township, Range or section markings on this map, and the roads are difficult to see, the vegetation communities could be located if this plate is used in conjunction with Centennial Plate 1, General Location Map (scale of 1:24,000).

Reference areas for the site are shown on Plate 9, Centennial Project Watershed, Culvert Xiaing and Revegetation Reference Areas. Three areas are shown: R-1, R-3, and R-4. George Cook of the Soil Conservation Service evaluated the three reference areas in 1987. Mr. Cooks evaluation is the only one on record in Appendix M of the MRP. There are no reference area evaluations in the annual reports on file. (The 1993 annual report for this mine is missing from the files and could not be checked.)

Plates 19 Vegetation Survey Map Deadman Canyon and Plate 20 Revegetation Map Deadman Canyon outline the vegetation in the Disturbed Area and three reference areas. The supporting vegetation survey is found in Appendix M. The information classifies the vegetation in the disturbed area and oak brush and/or pinyon/juniper.

Findings:

The information provided in the application meets the minimum requirements of the Vegetation Resource Information section of the regulations.