



0001  
 STATE OF UTAH  
 NATURAL RESOURCES  
 Wildlife Resources

Scott M. Matheson, Governor  
 Temple A. Reynolds, Executive Director  
 Douglas F. Day, Division Director

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

November 20, 1984

Dr. Dianne R. Nielson, Director  
 Utah Division of Oil, Gas and Mining  
 4241 State Office Building  
 Salt Lake City, UT 84114

*1 NA/007/021  
 #2*

Attention: James Smith

Subject: North American Equities' Response to ACR for MRP at Blazon #1 Mine.

Dear Dianne:

The Division has evaluated North American Equities' Permit Application Package (PAP) for the Blazon #1 Mine. The PAP is still lacking habitat information as was directed by guidelines issued by OGM on June 11, 1980. This information had been provided to North American Equities n.v. by the Division of Wildlife Resources in a letter dated July 10, 1981. The PAP also lacks inclusion of an adequate fish and wildlife mitigation plan, which was also provided for DWR in the same letter. This material should be an integral part of the PAP.

The PAP makes no provision to compensate for springs and seeps should their flows be disrupted by mining. Because springs and seeps are of critical importance to all wildlife species, North American Equities n.v. should be expected to mitigate for impacts to any springs within the permit area. These concerns were previously registered in our letter of January 13, 1984.

There is disparity in the number of acres actually disturbed. Number 817.97-2, paragraph 3, states that less than 5 acres will be disturbed while 817.97-4, paragraph 1, says less than 7 acres will be disturbed. The PAP needs to clear up the ambiguity.

The crucial-critical habitat anticipated to be impacted (817.97-a, paragraph 2) is riparian habitat. The PAP should make this clear, as well as the exact amount disturbed. The PAP does not plan to mitigate for this loss. It is our opinion that the applicant should be required to mitigate "in kind" for the riparian habitat lost.

Thank you for an opportunity to review the PAP and provide comment.

Sincerely,

*William H. Geer*  
 William H. Geer, Acting Director  
 DIVISION OF WILDLIFE RESOURCES

*Orig Mine file  
 cc R. Daniels  
 M. Barock  
 S. Hinner*