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RECEIVED  
AUG 28 1990

COPY

Adam S. Affleck

DIVISION OF OIL, GAS & MINING  
August 27, 1990

FAX/U.S. Mail

Ms. Dianne Nielson  
Mr. Lowell Braxton  
Division of Oil, Gas and Mining  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84101

201007021  
#2

Re: Abatement of NOV 90-13-3-1/Application for  
Permit Change

Dear Dianne and Lowell:

Enclosed is a letter from Earthfax Engineering, Inc., which proposes remedial action on the cut slope area of the access road as required by NOV 90-13-3-1. Since this response requires NAE to make changes in the method or conduct of reclamation activities authorized or required under its approved permit and reclamation plan, I assume that the proposal will be treated as an initial application for a permit change under Utah Admin. R. 614-303-220. Furthermore, since this change was not required by an order issued under Utah Admin. R. 614-303-212 or 614-303-213 and does not appear to meet any of the other definitions of a significant permit revision under Utah Admin. R. 614-303-224, I assume that this will be regarded as a permit amendment and exempt from requirements for notice, public participation, and notice of decision. We will expect your response to this initial application for a permit change within 15 days of your receipt as required by Utah Admin. R. 614-303-221.

Please confirm that this proposal is properly considered an amendment and contact me if you have any questions or concerns regarding this matter.

Sincerely,

*Adam S. Affleck*  
Adam S. Affleck

bb

cc. Richie D. Haddock  
Jill Hodge

August 24, 1990

Dianne R. Nielson, Division Director  
Lowell P. Braxton, Associate Director, Mining  
Utah Division of Oil, Gas & Mining  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Subject: Blazon No. 1 Mine NOV N90-13-3-1

Dear Ms. Nielson and Mr. Braxton:

On July 26, 1990, the Utah Division of Oil, Gas & Mining issued NOV N90-13-3-1 to North American Equities for the Blazon No. 1 Mine. This NOV was issued for "failure to include reclamation treatments for [cut slopes adjacent to the mine access road] in the approved reclamation plan." The purpose of this submittal is to provide the required reclamation plan.

Reclamation of the mine access road cut slopes will be accomplished by broadcast seeding. The following seed mix will be used:

<u>Common Name</u>	<u>Rate (lbs pls/ac)</u>
<u>Grasses</u>	
Streambank wheatgrass	8
Slender wheatgrass	8
Mountain brome	10
Camby bluegrass	6
Kentucky bluegrass	0.5
<u>Forbs</u>	
Western yarrow	0.3
Sweet vetch	2
Blue flax	4
Ladak alfalfa	2
Sweet anise	2
Yellow sweetclover	4
<u>Woody Plants</u>	
Rocky mountain maple	6
Serviceberry	5
Mountain big sagebrush	0.2
Oregon grape	4
Blue elderberry	2
Douglas fir	2
Wax current	2
Woods rose	3
Snowberry	4



**EarthFax**

EarthFax  
Engineering Inc.  
Engineers/Scientists  
7324 South 1300 East  
Suite 100  
Midvale, Utah 84047  
Telephone 801-561-1555

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Mr. Lowell Braxton  
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Exceptions to the above seed mix may be necessary due to unavailability when ordering. These exceptions will be discussed with the Division prior to seeding.

Seeding will be performed to immediately pre-date the first snowfall of the season. It is currently anticipated that this will result in seeding between October 15 and October 30, 1990.

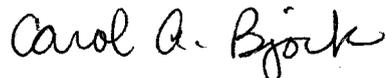
The seed will be broadcast on the cut slopes and raked into the existing soil. Following broadcasting and raking, fertilizer will be broadcast onto the seeded area at a rate of 87 pounds per acre of 46-0-0 in the form of urea.

The NOV was also issued for an apparent failure to include the cut slopes within the disturbed area of mine permit area. However, it is our opinion that the disturbed area boundary shown on plates included with the July 1989 as-built reclamation report adequately show that the disturbed area extends to the west of the mine access road to include the area of the cut slopes.

The exact location of the cut slopes will be field verified during an August 30, 1990 site visit. The results of this field verification will be reported to the Division following the site visit.

Please inform us if you need additional information.

Sincerely,



Carol A. Bjork, P.E.  
Civil Engineer