

mine file # 007/033
cc Rick Smith

0014



United States Department of the Interior

2890
UTU-48027
(U-066)

BUREAU OF LAND MANAGEMENT
Moab District
P.O. Box 970
Moab, Utah 84532

RECEIVED FEB 21 1989
FEB 23 1989

Mr. John Whitehead
Utah Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

DIVISION OF
OIL, GAS & MINING

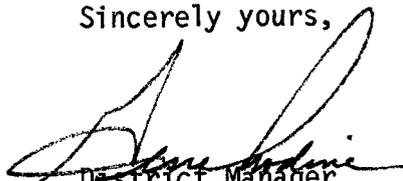
Dear Mr. Whitehead:

We have reviewed Andalex Resources' Wildcat Loadout (PRO/007/033) permit application package. Our major concerns about the package were addressed in our letter of February 29, 1988.

We have worked with the Utah Division of Wildlife Resources and Andalex to develop a wildlife mitigation plan for the project. Enclosed is a copy of the final mitigation plan. If the plan is incorporated in the approved permit and the company submits the missing right-of-way documents, we recommend that the permit be approved.

If you have any questions, please feel free to contact Mark Mackiewicz in our Price Office at (801) 637-4584.

Sincerely yours,


District Manager

Enclosure:
Wildlife Mitigation Plan

PROJECT DESIGN PACKAGE FOR MITIGATION OF
IMPACTS TO MULE DEER CRITICAL WINTER RANGE

ANDALEX RESOURCES COAL LOADOUT FACILITY

The following off-site mitigation package is provided to Andalex Resources by the BLM in coordination with the Utah Division of Wildlife Resources to meet a mitigation requirement of the Utah Division of Oil, Gas and Mining for the permitting of the Wildcat loadout facility. Two options are presented. Either option will meet the requirement to: mitigate impacts to 15 acres of critical winter range which has been taken out of production as mule deer critical winter range.

OPTION 1 - BROWSE INTERSEEDING

Project Objective: Improve winter and spring forage for mule deer on critical winter range in close proximity to surface disturbance associated with the loadout facility.

Project Description: Treat identified area (existing PJ chainings) on Map 1 as follows:

Seed a total of fifteen acres (approximately 50 percent) of the treatment area with the forb-browse seed mixture listed below. Treatment should be accomplished during the period from October 15 until November 15 or as otherwise mutually agreed on by operator and authorized officer.

Project Outline:

1. Complete an archaeological clearance on 30-acre project area.
2. Using D7 Crawler tractor with dozer blade, pull brushland plow across treatment areas, strictly along the contour, to prepare suitable seed bed in which to drill seed. Adjust the pull angle of the plow to ensure all sodded grasses are turned over. The entire treatment area will be worked in a contour strip pattern in which 50 percent will be prepared for seeding while 50 percent is left undisturbed. The strip pattern should approximate 6 feet scalps separated by 6 feet strips of undisturbed ground.
3. Following seed bed preparation, use D4 Crawler tractor or suitable rubber-tired implement to pull rangeland drill along seed bed.
4. Hand seed all other disturbed sites associated with enhancement project (i.e., equipment load and unload sites).

Note: All hand seeding will include hand raking following application of seed.

5. Use the following listed species and application rates for seeding within the treatment area. All seed must meet or exceed specifications listed below or otherwise be approved by the authorized officer prior to use in the enhancement project. Special attention should be given to the seed source requirement.

Equipment needed:

- 1 - D4 or similar size Crawler tractor
- 1 - D7 or other 60-70 Drawbar horsepower Crawler tractor
- 1 - Rangeland drill, equipped with depth bands (provided by BLM)*
- 1 - Brushland plow (provided by BLM)*
- 2 - Track-mounted seed dribblers

*See terms for equipment loan.

SEED SPECIFICATIONS

<u>Species</u>	<u>Lbs/acre (PLS)</u>
Mtn. big sage	.5
Antelope bitterbrush ¹	2.0
Fourwing saltbush ¹	3.0
Prostrate Kochia	.5
Utah serviceberry ¹	.5
True mountain mahogany ¹	.5
Whitestem rubber rabbitbrush	1.0
Small burnet	2.0
Common sainfoin	2.0
Alfalfa (Nomad/Ladak, Ranger)	<u>2.0</u>
Total	12.0

¹Seed source requirement:

Antelope bitterbrush: Maybell variety or Utah seed collected at elevation between 6,000 and 6,800 feet.

Fourwing saltbush: Rincon variety or seed collected at elevation between 5,500 and 6,800 and collected within 200 airline miles of project area.

Utah serviceberry, True mtn. mahogany: Collected at elevation between 5,500 and 6,800 feet and collected within 200 airline miles of project area.

Terms for Use of Government Equipment

Andalex Resources agrees to hold the Bureau of Land Management free from liability for any claims against them for damages caused during the use of the government equipment.

Andalex Resources agrees to repair or replace damaged, lost, or stolen equipment while in their custody. Replacement will be made at fair market value of the equipment at the time of destruction or loss.

Andalex Resources agrees to do routine periodic maintenance on government equipment while in custody.

Andalex Resources accepts responsibility for transporting government equipment from Price BLM wareyard and returning it to the Price BLM wareyard within 10 days following project completion.

The Bureau of Land Management does not make any warranties regarding the condition of equipment provided to Andalex Resources Coal Company.

The Bureau of Land Management does not assume liability for damages of any kind resulting from the use of the equipment provided to Andalex Resources.

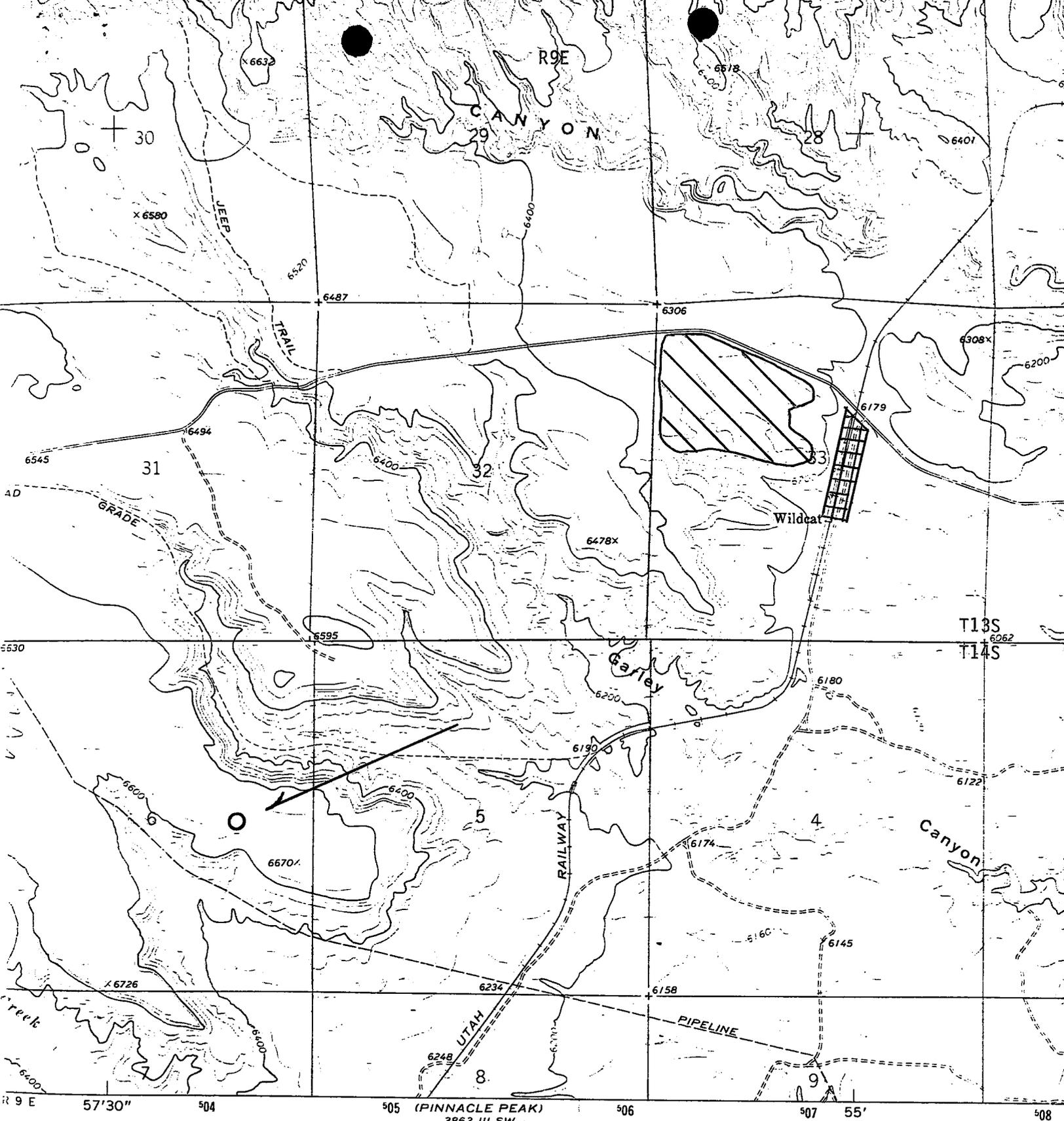
The authorized officer shall have a representative present during all phases of enhancement work. The representative, experienced with the use of these specialized pieces of equipment and this seeding method, will provide direction and guidance onsite for any problems that may occur.

OPTION 2 - WATER CATCHMENT INSTALLATION

Project Objective: Improve distribution of mule deer and elk on critical winter range and thereby reduce pressure on browse in highly concentrated use areas. The guzzler will serve to increase use in the area of the catchment in fall, winter and spring and reduce use on the adjacent critical winter range.

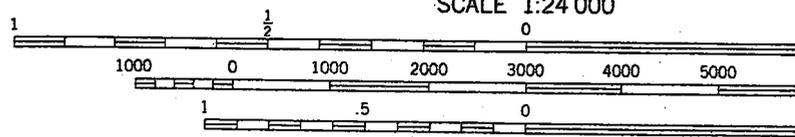
This mitigation project will also benefit a large diversity of other game and nongame wildlife species dependant on free water.

Project Description: Place water catchment device in location shown on Map 1. Recommended catchment design is included as Attachment 1. Minimum specifications for catchment design are listed below.



T13S
6062
T14S

SCALE 1:24 000



CONTOUR INTERVAL 40 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

MAP 1 ANDALEX RESOURCES MITIGATION PROJECT AREA

-  APPROXIMATE FACILITY LOCATION
-  BROWSE INTERSEEDING AREA
-  WATER CATCHMENT LOCATION

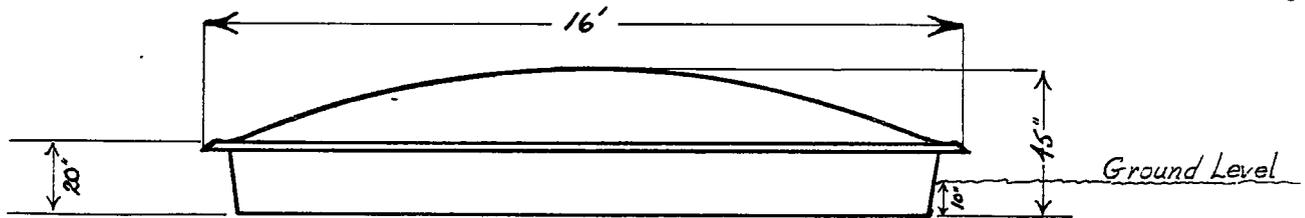
THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225. OR RE...

"THE RANGE GUZZLER"

WATER COLLECTION AND STORAGE UNIT

PARABOLIC TANK COLLECTOR

Collecting Area..... 200 Sq. Ft.
 Storage Capacity 2,100 Gal.
 Rainfall required to fill unit 17 In.
 Weight 950# Approx.

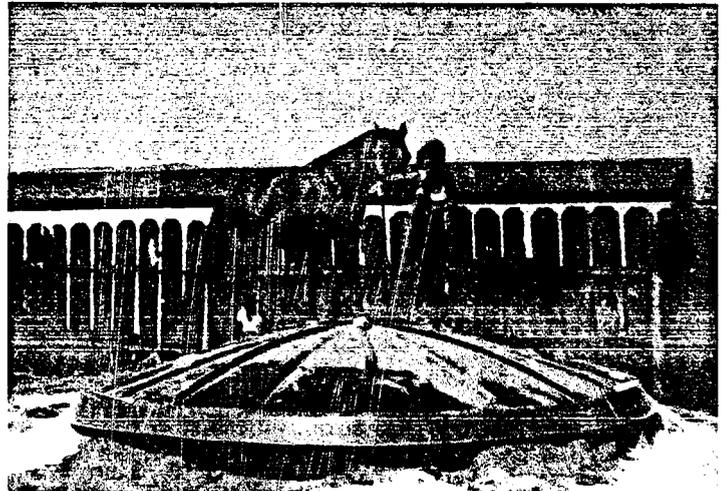


PATENT PENDING

Evaporation Resistant Water Collection
& Storage Unit

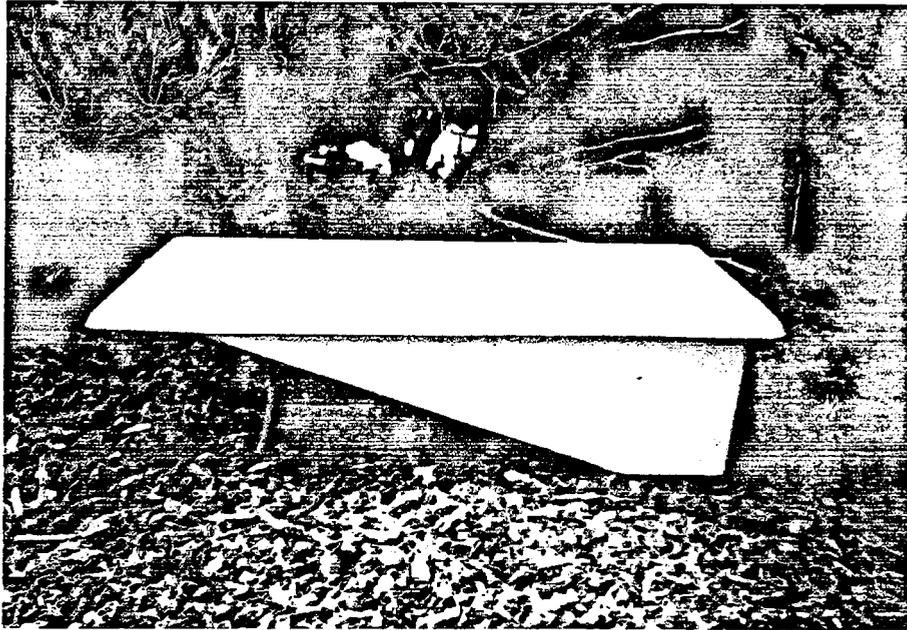
ADVANTAGES

IT WORKS — Eliminates up to 99% of evaporation. Unit is light and can be relocated if water needs change. Eliminates maintenance, there are no floats or valves. Fiberglass construction assures very long life. Installation requires three men for one day — Excavation is only ten inches deep in a 16-foot circle, backhoe not required. A survival ramp is included so small game or rodents won't drown in unit. Easily transported. Unit is shipped complete with special tools needed for installation.

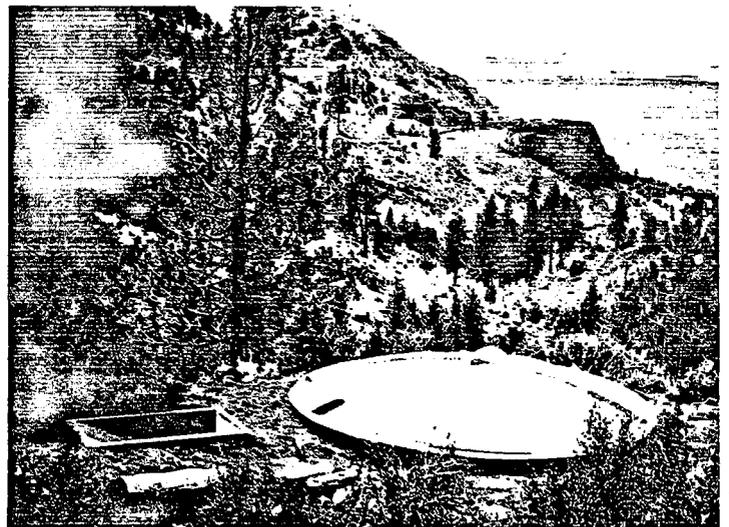


1,100-lb. horse walking across extra heavy top, designed to support moose or elk and accommodate snow loads of more than 6 feet. Optional.

THE NEW "EXTERIOR DRINKING RAMP" For Attachment to the "Range Guzzler"



Six feet long, four feet wide, 20 inches deep — holds 100 gallons.

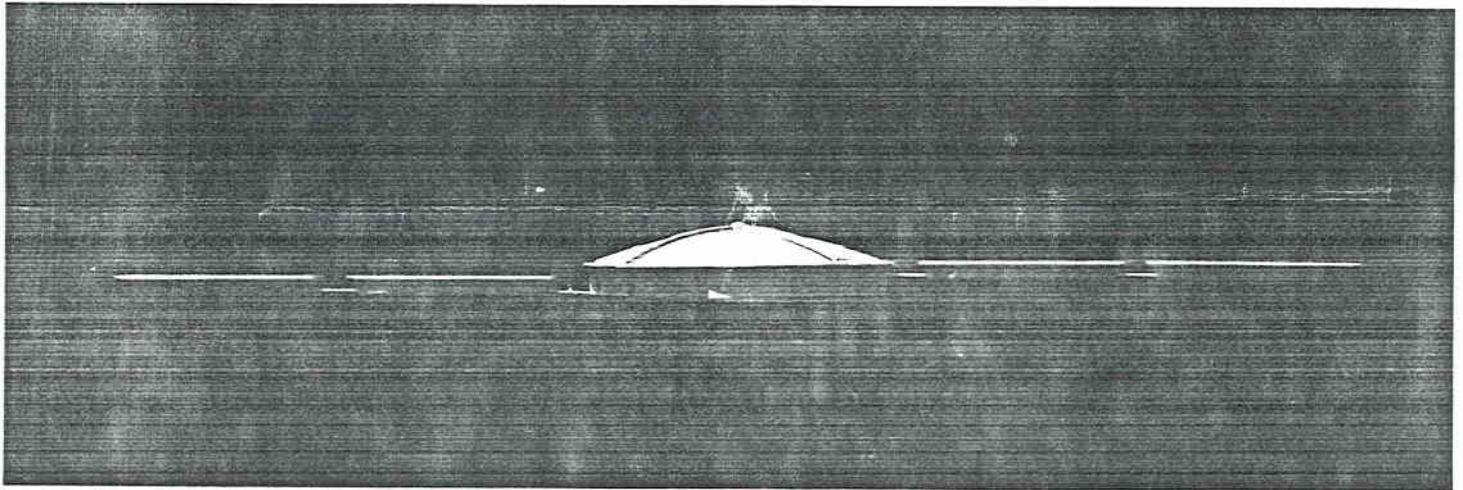


All of the water inside the unit is protected from evaporation.

The "Exterior Drinking Ramp" adapts our 2,100-gallon unit for small game as well as large game without the use of floats or valves. The ramp has a non-skid surface, so even new-born fawns can use it.

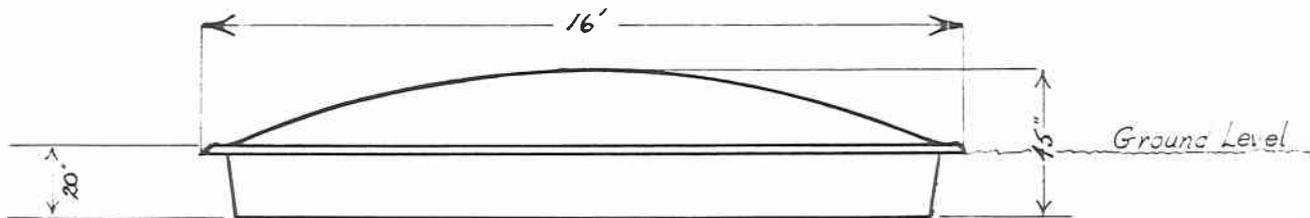
ADDITIONAL USES FOR THE "RANGE GUZZLER"

We now have sheep troughs available for our 2,100-gallon unit. These troughs are ten feet long, eleven inches deep and 18 inches wide. The troughs installed at the higher elevation fill as the unit fills. When these troughs are emptied by the sheep, the shepherd opens the valve in the lower elevation troughs and fills the second set of troughs. When the unit has been emptied, he closes the valve and the unit is then ready to again collect rainwater. Each trough holds 100 gallons of water.



PARABOLIC TANK COLLECTOR

Collecting Area..... 200 Sq. Ft.
Storage Capacity 2,100 Gal.
Rainfall required to fill unit 17 In.
Weight 950 # Approx.



All of the water inside the unit is protected from evaporation.