

**ANDALEX**  
RESOURCES, INC.

P.O. BOX 902  
PRICE, UTAH 84501  
PHONE (435) 637-5385  
FAX (435) 637-8860

November 16, 2005

Pamela Grubaugh-Littig  
Permit Supervisor  
Utah Division of Oil, Gas & Mining  
P.O. Box 145801  
Salt Lake City, Utah 84114-5801

*Incision*  
*C/007/0033*

Re: Updated Pages for M.R.P., Andalex Resources, Inc., Wildcat Loadout, C/007/0033, Task ID #2089

Dear Pam:

Enclosed are 5 copies of updated pages for the Wildcat Loadout M.R.P. These pages are being submitted to update and clarify the test plot monitoring schedule.

A C<sub>1</sub>/C<sub>2</sub> Form is also enclosed.

If you have any questions, or need additional information, please contact me.

Sincerely,

Michael W. Glasson, P.G.  
Senior Geologist

# APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: C/007/ 033
Title of Proposal: Updated Pages for M.R.P.						Mine: Wildcat Loadout
						Permittee: Andalex Resources, Inc.

Description, include reason for application and timing required to implement: **Current Air Quality Approval Order for M.R.P.**

**Instructions:** If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

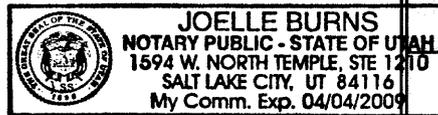
**X Attach 5 complete copies of the application.**

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

*Michael W. ...*  
Signed - Name - Position - Date

Subscribed and sworn to before me this 18 day of Nov, 2005

*Joelle Burns*  
Notary Public  
My Commission Expires Apr 4, 2005  
Attest: STATE OF Utah COUNTY OF San Juan



Received by Oil, Gas & Mining

ASSIGNED TRACKING NUMBER



to construction and stored and protected for use in final reclamation. Please see Plate 13 for a summary of stored topsoil. Appendix D also includes a topsoil mass balance and includes soil quality data from the Utah State University Testing Laboratory. The mass balance indicates that there may not be sufficient volume of topsoil for final reclamation. Andalex has committed to identifying and testing for suitable substitute material either off the permit area or possibly within the permit area if a suitable growth medium can be identified.

Andalex has identified four different locations within the permit area to be used for revegetation test plots. These areas are all located on slopes of fill material created during the construction of the site. The object of these test areas is to determine whether or not all of the fill material within the permit area may be used as substitute topsoil for final reclamation purposes. The test plot locations are shown on Plate 1 designated A, B, C & D, and are located in such a fashion so as to cover the various types of fill material throughout the entire permit area. It is doubtful that the different fill areas vary with respect to chemical constituents or reclamability; however, the revegetation test plots will prove or disprove this theory. It is Andalex's goal to demonstrate that any of the fill material may be used as topsoil substitute and thereby mitigating the shortfall of topsoil gathered due to previous disturbance on site. Based on the area to be reclaimed versus the volume of topsoil currently gathered and in piles, Andalex requires that an additional 31,954 cubic yards of substitute material be identified.

These four locations were treated according to discussions and commitments between Andalex and the Division in the fall of 1989. The treatment included fertilizing, tilling, mulching (weedless alfalfa hay) and seeding. Andalex agreed to quantitatively analyze these areas after two growing years and conducted the survey in the summer of 1992 and 1993. The results of the survey are found in Appendix N. Andalex will perform one more quantitative test on these plots

in the summer of 2006. Andalex recommends that the consultant performing the survey be asked for an opinion as well. These techniques may include different bed preparation; using native, local seed; and different fertilizing techniques, including no fertilizer.

In the unlikely event it is determined that the fill material is not suitable for topsoil substitute, Andalex will commit to further discussing solutions with the Division, or locating offsite topsoil substitute material. This will have to be accomplished in conjunction with a new Bureau of Land Management right-of-way issued for this purpose; therefore, it is hoped that the fill material proves suitable.

In addition to these revegetation test plots, in 1994, Andalex created four new test plots on the surface of the new topsoil storage piles located on the west side of the tracks adjacent to existing topsoil pile E.

These test plots will be approximately 40 feet square and will not be situated on any of the slopes of the topsoil pile. All four test plots will have a roughened surface (roughened meaning troughs and hills between one and four feet in height). Also, all four test plots, along with the remainder of the surface of the topsoil pile will be mulched and have incorporated one ton of weed-free alfalfa hay per acre (the alfalfa will be tested by the Utah State University Agricultural Extension Service). The seed mixture to be used on all of the test plots, as well of the remainder of the topsoil pile is listed on Page 80 of this Plan. Seeding will occur no later than October 14, 1994. Seeding will be by hand-broadcasting and will not be raked if the surface is in a loose condition and not crusted.

Test Plot 1 - Test Plot 1 will not be irrigated; it will be mulched with three to four-tons-per-acre of alfalfa hay in an effort to retain natural moisture. The alfalfa hay will be incorporated into the surface so as not to attract deer.

Test Plot 2 - Test Plot 2 will be irrigated.

Irrigation will be accomplished through the use of soaker hoses or fine-mist spray according to the following schedule:

In terms of inches of water, the initial profile wetting will be one inch which will occur in the Spring of 1995, approximately April 1. Irrigation will proceed at the rate of one inch every four days for four to six weeks (assuming lack of natural precipitation). Following this, the plot will be irrigated with one inch of water every two weeks until the end of the season, approximately mid-September, 1995. In addition, Test Plot 2 will be covered with North American Green Straw matting, which will be stapled adequately to the surface. The matting which is planned for use will have netting on one side only.

Test Plot 3 - Test Plot 3 will be irrigated in the same fashion of Test Plot 2. In addition, Test Plot 3 will have 1.5 tons-per-acre straw applied and anchored with biodegradable netting.

Test Plot 4 - Test Plot 4 will not be irrigated. In addition to the one-ton-per-acre alfalfa mulch this test plot will be covered with 1.5 tons-per-acre oat or barley straw. This straw will also be covered with a biodegradable mesh which will be stapled to the surface.

It should be noted these test plots were last monitored in 1997, and at that time, showed that they can be revegetated. No further monitoring of these test plots is proposed.