

February 2, 2006

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

Subject: MRP Rewrite, Andalex Resources, Inc, Wildcat Loadout, C/007/0033,  
Task ID #2371, Outgoing File

Dear Mr. Glasson:

Over the course of two years, the Wildcat MRP revision has been reviewed by Division staff on four separate occasions: Tasks #2371, #2277, #2089, and #1911. Once more the Division is providing a list of deficiencies. When you respond with additional page changes, please provide electronic copies of the entire revised MRP. In order for us to continue to process your application, please respond to these deficiencies by March 2, 2006.

Although the reformatted plan revised Plate 1 (Surface Facilities), Plate 2 (Surface Facilities Topography), and Plate 13 (Top Soil Storage Piles), the Division understands that Andalex will retract these plate revisions (with the exception of Plate 13, Topsoil Storage Piles) until all the existing information on the Plates can be included in the digital format.

The permit area covers 100.19 acres. The reclamation plan is for the 60.94 acre disturbed area. (Exhibit A of the Reclamation Agreement describes a 63.7-acre area). The Division expects to continue refining the reclamation plan for this site in cooperation with the Permittee. For instance, utilizing soil within the permit area (based upon the soil survey conducted in March 2003, by Mr. Jim Nyenhuis), rather than off-site. And, Mr. Collins' recommendation of removing Fairway crested wheatgrass from the seed mix is well taken. Also, the following techniques might also be evaluated in planning for reclamation: raking seed to increase shrub germination, applying polyacrylamide (PAM) to increase water infiltration, using wood-fiber hydromulch, eliminating fertilizer, and changing the timing of seeding. The Division is awaiting the results of the 2006 quantitative information from the revegetation test plots before commenting on this reclamation plan.

Page 2  
Mike Glasson  
February 2, 2006

Please contact either Priscilla Burton (435) 613-1146, ext. 207 or myself at (801) 538-5268 with questions.

Sincerely,

Pamela Grubaugh-Littig  
Permit Supervisor

PWB/sd  
Enclosure  
cc: Price Field Office  
O:\007033.WCL\FINAL\WG2371\DEF2371.DOC

## TECHNICAL DEFICIENCIES

### MRP Rewrite, Task 2371

**R645-301-121.200**, Address these formatting issues that relate to biological and cultural disciplines to present the narrative more clearly [jae]:

The newly formatted MRP refers many of the sections from 301-311 through 301-322, 301-232, and 301-322 through 301-358 to appendices or sections 301-310, 301-331, and 301-240. Consequently, there are minor problems with the new format that include referenced material in sections unrelated to the regulation, referenced material is missing from sections/appendices, and reference material is incorrectly labeled as not applicable (NA). The Permittee must address these formatting issues to present the narrative more clearly (R645-301-121.200). The following list provides some of the areas to address:

- Update the correct number of plates on the Table of Plates. Table of Plates lists 1-20 instead of 1-28. Plate 21 is missing.
- Change the citation “see R645-301-331” from sections 301-357.220 and 301-357.312 to the appropriate sections in the 301-340/341 series. \*The current citations are not correct given that the Permittee relocated the information from section 301-331 to more appropriate sections.
- Clarify what is meant by “hydroseeded and hydromulched due to...” (p. 3-22).
- The Permittee relocated confidential information from the approved Volume I, Appendix A to a Confidential Binder. The Permittee still needs to provide appropriately labeled tabs.
- The Division made an incorrect request for the last submittal concerning confidential information. There is no confidential information on pages 4-2 or 4-3. The Division requests that the Permittee keep these pages in the MRP Chapter 4, remove the relocation page for these two pages, and remove these two pages from the Confidential Binder. The Permittee will need to adjust their electronic version as well as the final submittal to include these pages in Chapter 4. The Permittee should mention this change in the C1C2 form and the Division (Jerriann Ernstsens) can make the changes. Please include the following:
  - Include pages 4-2 and 4-3 in Chapter 4.
  - Remove pages 4-2 and 4-3 from Confidential Binder.
  - Do not include the relocation page for pages 4-2 and 4-3.