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STATE OF UTAH
NATURAL RESOURCES
Wildlife Resources

*orig mem file
about L Blaxton*
File Act/07/034 #2
Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
William H. Geer, Division Director

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October 19, 1988

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DIVISION OF
OIL, GAS & MINING

Dr. Dianne R. Nielson, Director
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Attention: Susan Linner

Dear Dianne:

The Division has reviewed Soldier Creek Coal Company's response to deficiency reviews of their Application for a Mining and Reclamation Plan at the Banning loadout. The following is offered for your consideration.

During our initial review (April 4, 1988) of the original application, the MRP indicated (page 15) no intent by the applicant to reclaim 4.7 acres associated with the access/haul road. This issue in the revised MRP (07-12-88) remains unresolved; the Division anticipates that the road will be reclaimed at project abandonment. Also, further development within the permit area would require mitigation, since it is critical valued antelope range. As you know, 26.1 acres of the 36 acre permit area was disturbed prior to enactment of current regulations.

Page 7-19 (7.2) as revised 07-12-88 and the original application pages 3-6 and 3-7 (3.5) - Crimp discing of a straw mulch is an excellent technique. However, this procedure may fail if revegetated areas are not protected by fence. Intense use by livestock and wildlife of the local area is well documented.

Thank you for an opportunity to review and provide comment.

Sincerely,

William H. Geer
Director