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**DIVISION OF
OIL, GAS & MINING**

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Permit Supervisor
Utah Division of Oil, Gas and Mining
355 West North Temple
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Salt Lake City, UT 84180-1203

Subject: Five Year Permit Renewal, J.B. King Mine, INA/015/002

Dear Pam:

Please find enclosed four sets of replacement pages for our mine and reclamation plan. These pages are intended to bring the permit up to date. When the permit renewal is approved, we will provide four sets of replacement pages on colored paper along with an updated color key system.

The J.B. King Mine was reclaimed shortly after the current permit was approved in August, 1985. There have not been many changes made since that time. Most of the replacement pages are self explanatory. A brief review is given below for those pages that require additional explanation.

Bond Amount

Western States Minerals Corporation (WSMC) proposes to keep the current bond in place until a Phase II partial release can be requested. The enclosed bond calculation is based on a worse case situation of repairing 20 percent of the reclaimed mine site plus the excavation and backfilling of the tension cracks in the subsided area.

Stream Channel Diversions

The Division approved the riprapping of portions of the main channel and feeder ditch on October 20, 1987 with the condition that Division approved field changes be incorporated into the amendment by updating map 4050-5-14R. We do not have an original map sepia for this drawing which would make the production of a revised map difficult. We have, instead, documented the channel maintenance work in a narrative form which references the original drawing.

Vegetation Monitoring

We originally proposed to perform vegetative monitoring during the 1st, 3rd and 5th years after reclamation. This work, to date, has been performed in the 2nd and 4th years. Lynn Kunzler of the Division's staff recommended that we perform the next vegetative inventory in 1991 (6th year) rather than 1990.

Division personnel have expressed concern over the relatively sparse vegetation on the east slope of the reclaimed refuse pile. We believe that the combination of previous cattle grazing and low precipitation over the past several years are the primary causes for the low vegetation density in this area. The rainfall amounts are beyond our control, but we have managed to control the cattle problem. We will evaluate this area in mid 1991 as part of our monitoring program. If warranted, interseeding or other measures will be proposed at that time.

Roads: Class III

The road around the mine perimeter that connects the county road with the road located on top of the cliffs is used on a regular basis by recreationists, woodcutters, and the cattle ranchers. We believe that the reclamation of this road would be impractical.

WSMC has two concerns with the current permit that we are not going to address in amendment form at this time. These concerns are outlined below.

1. Both Division staff and WSMC contractors have expressed concern that the vegetation reference area may not be appropriate for the site. Preliminary work to change the reference area was performed in 1986 but never approved as an amendment. We will reevaluate the current reference area in the summer of 1991 with Division vegetation and soils specialists. If warranted, a new reference area will be selected and inventoried at that time.
2. There exists a certain amount of debate as to what maintenance measures can be performed at a reclaimed mine site without the 10 year bond liability period being restarted. We would like to see the Division develop a guideline to address this issue. We would hope that such a guideline would encourage such things as interseeding and minor erosion repairs while at the same time protecting the state's interest in long term viability of reclamation work.

I encourage you and your permit team members to give me a call if you have any questions or concerns. The specialists doing the review work should keep in mind that the plan is organized on a color coded system with the more recent submittals acting to both clarify and modify the earlier material.

Sincerely,

Western States Minerals Corporation



Frank Filas
Environmental Engineer

cc: A.S. Gordon