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September 1, 1992

ACT/015/007-#2

SEP 03 1992

DIVISION OF
OIL GAS AND MINING

VIA FACSIMILE

Pamela Grubaugh-Littig
Permit Supervisor
Division of Oil Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Storm Buffer Zone, Division Order DO-92A

Dear Ms. Grubaugh-Littig:

Your letter to me of August 27, 1992 informed me that our response of August 24, 1992 was adequate, but suggested additional minor changes toward the resolution of this issue.

The memorandum from Mr. Tom Munson of August 26, 1992, to which you referred me for guidance, makes the distinction between using the terms "reseeded" or "seeded." This raises an issue which needs to be resolved before we proceed, to wit: Does the seeding of this area extend the responsibility period beyond the initial ten (10) years?

We are presently in the sixth year of reclamation. It would seem inherently unfair for the Division to order us into an action which extends our responsibility period, but I can find nothing in the regulations that is exactly on point. As we discussed, it is probably better to resolve now whether or not an issue exists, and to do so in writing.

Please let me know the Division's position on this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Lee Edmonson'.

Lee Edmonson
Manager
Planning and Regulatory Affairs

LE/cn
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