



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF OIL, GAS AND MINING

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November 15, 1994

TO: Daron Haddock, Permit Supervisor

FROM: Susan M. White, Senior Reclamation Biologist *SMW*

RE: Draft Review, Permit Renewal, Trail Mountain Mine,
PacifiCorp, ACT/015/009, Working File, Emery County,
Utah #2

SYNOPSIS

PacifiCorp submitted a revised and updated permit document dated October 21, 1994. This revision is in conjunction with the five year permit renewal, February 20, 1995. Submitted form DOGM-C1 clarifies that the only changes made are in ownership, control right of entry, compliance, underground design and mine sequence, and reclamation bonding costs.

ANALYSIS

I was asked to review the legal description in the above referenced submittal. Based on the legal description in the 1990 Findings Document and the 1991 Federal Lease Findings Document, the legal description is the same except that Lots 1 and 2 were omitted from Section 35. I am also confused as to why the description does not state that all of Section 35 is included as shown on the permit map.

The new submittal states that the disturbed area is 10.02 acres. According to the latest, 1993, Exhibit A, Surface Disturbance, of the Reclamation Agreement, the disturbed area is 24.78 acres. No change to this agreement was found in the files. Therefore, the permit document must be revised to state that 24.78 acres have been disturbed.

The revision is in a highlight strike out format with all new pages having a revision date of 10/21/94. All of Chapter 3 was replaced and has the 10/21/94 date. Many of the pages of Chapter 3 were simply renumbered or have nonsubstantive changes. I think that this will be confusing in the future to have 10/21/94 dates on pages which have minimal or no revisions. When approved as part of the permit package this date will imply that the Division has done a comprehensive review of the permit as



recently as 10/21/94. I recommend that only those pages with substantive changes include the revision date of 10/21/94.

RECOMMENDATION

The following must be changed or clarified prior to approval.

1. The status of Section 35 must be clarified.
2. The disturbed area acreage must reflect the acreage of the most current Reclamation Agreement.
3. Only those pages with substantive changes should have a revision date of 10/21/94.

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