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A Professional Corporation

January 27, 2000

file!
Wild Horse Ridge
12/2/00

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ACT/015/025 incoming

Mr. Lowell Braxton, Director
 DIVISION OF OIL, GAS, & MINING
 1594 West North Temple, Suite 1210
 Box 145801
 Salt Lake City, Utah 84114-5801

RECEIVED

JAN 27 2000

**DIVISION OF
OIL, GAS AND MINING**

Re: Cause No. ACT/015/025

Dear Mr. Braxton:

Pursuant to Utah Administrative Code R645-300-122, the Huntington-Cleveland Irrigation Company submits the following objections to the addition of the Wild Horse Ridge Leases to the Bear Canyon Mine, ACT/015/025-SR98-1, and requests that the Division hold an informal conference at its Salt Lake City offices on the application pursuant to R645-300-123.

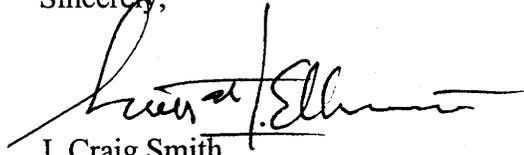
Among other things, Huntington-Cleveland notes with concern that the *Potential Groundwater Quantity and Quality Impact* statements (*Gentry Mountain CHIA*, September 16, 1998, pp. 26-27) contain little more than basic generalizations about groundwater which any decently informed person could draft without reference to anything, rather than the specific observations and conclusions so necessary to a proper conclusion and recommendation. The impact of such a considerable expansion as Co-Op Mining Company contemplates surely requires an appropriately serious evaluation. The short-shrift these critical matters receive in the present CHIA will not do.

Huntington-Cleveland also notes that the most recent measurements of water in and around the Bear Canyon mine apparently took place some time in late 1996 or 1997. Inasmuch as water levels and flows can change quite rapidly, information as much as three years out of date seems rather antiquated. More current water measurements ought to be obtained before the Division reaches a final decision regarding the Co-Op Mining Company's application.

Lowell Braxton, Director
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We look forward to the opportunity to discuss these and other concerns.

Sincerely,

A handwritten signature in black ink, appearing to be "J. Craig Smith" and "Scott M. Ellsworth" written together.

J. Craig Smith
Scott M. Ellsworth

JCS/ch
cc: Huntington Cleveland Irrigation Company

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