



P.O. Box 1077, Price, Utah 84501 794 North "C" Canyon Rd, East Carbon, Utah 84520
Telephone (435) 888-4000 Fax (435) 888-4002

Daron Haddock
Permit Supervisor
Utah Division of Oil, Gas and Mining
P.O. Box 145801
1594 West North Temple, Suite 1210
Salt Lake City, Utah 84114-5801

October 8, 2009

Re: Crandall Canyon Mines, C/015/032
Commitment for macroinvertebrate studies
Citation 10044

Dear Mr. Haddock:

As part of the required actions for the abatement of Citation 10044, enclosed are six (six) copies of amended page 3-17 from the MRP, in which Genwal Resources, Inc. commits to future macroinvertebrate studies in Crandall Creek. This is in regards to the iron staining in the creek from the mine discharge water.

Enclosed for your review are redline-strikeout copies, redline (only) copies, and clean copies. Ingrid Wieser has already seen the change, to her satisfaction.

Assuming the change is approved, you can simply stamp the clean copies for incorporation, and return one to me.

If you have any questions or comments regarding this submittal please contact me at 435 888-4017.

Sincerely,

A handwritten signature in black ink, appearing to read "David Shaver", is written over a faint, larger version of the same signature.

David Shaver
Resident Agent

cc: Ingrid Wieser, DOGM

RECEIVED

OCT 14 2009

DIV. OF OIL, GAS & MINING

APPLICATION FOR PERMIT PROCESSING

<input type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: 015/032
Title of Proposal Commitment for future macroinvertebrate studies						Mine: Crandall Canyon Mines
Abatement requirement for Citation 10044						Permittee: GENWAL Resources, Inc.

Description, include reason for application and timing required to implement.

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	9. Is the application submitted as a result of a Violation? 10044
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

Attach 3 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations therein. (R645-301-123)

Signed - Name - Position - Date

[Signature] **10/8/09**
 agent

Subscribed and sworn to before me this 8th day of October, 2009

My Commission Expires: May 16, 2012
 Attest: STATE OF Utah
 COUNTY OF Cedar



MARY V. KAVA
 NOTARY PUBLIC • STATE OF UTAH
 COMMISSION # 574280
 COMM. EXP. 05-16-2012

Received by Oil, Gas & Mining

RECEIVED

OCT 14 2009

DIV. OF OIL, GAS & MINING

ASSIGNED TRACKING NUMBER

in the area, the information from that map is shown on Plate 3-1. Crandall Canyon is of critical grazing value to moose all year long.

As per Larry Dalton, State of Utah, Division of Wildlife Resources, there are no known locations of drumming logs in Crandall Canyon or near the proposed surface or haul road areas to be disturbed.

The loss of 1,500 feet of fisheries habitat will be mitigated with the recommendations from the UDWR and the U.S. Forest Service. GENWAL, the U.S. Forest Service and the Utah Division of Wildlife Resources have agreed to mitigate this loss. Refer to Appendix 3-12 for the specific mitigation measures that have been agreed upon by GENWAL and the agencies.

Also, the previously approved and also the recently updated air pollution control plan, as submitted in the permit, contains itemized mitigation for dust abatement during construction. In 1983 the practice of dumping rock and soil adjacent to the mine site near Crandall Creek was stopped, to reduce impact to fisheries and food production in Crandall Creek. Efforts will continue in the future to limit disturbance of fishery habitat.

GENWAL feels that the initial aquatic study and report provides sufficient baseline data (Appendix 3-2). Additional studies have been performed in 1994 and in the fall of 2009. The company commits to continue to conduct macroinvertebrate studies twice yearly, in the spring and fall, until the Division and US Forest Service agree that sufficient data has been collected.

UDWR has conducted cliff nesting raptor surveys of the entire permit area. These surveys have located one site where Golden Eagles either have historically built eries or areas that have a potential for eries.

Aerial surveys of the eagle nest will be conducted every three years or on request of the USF&W Service or the UDWR. Prior to the implementation of UDWR recommendations, GENWAL will advise UDOGM and request their approval and/or recommendations. An annual survey will only be conducted: (1) in the event that UDWR recommends it, (2) this course of action will not unduly harass or stress nesting eagles, and (3) if prudent to insure their safety and/or habitat.

Wildlife

In addition to cliff nesting raptors, there is a potential for 5 tree nesting raptors inhabiting the permit area. They are: the (1) Goshawk, (2) Sharp Shinned Hawk, (3) Red Tailed Hawk, (4) Swainson's Hawk and the (5) Ferruginous Hawk (the Price office of the U.S. Forest Service is of the opinion that the Ferruginous Hawk is unlikely to occur in the mine permit area). All of these species are condo-nesters and will normally have a number of nest locations and only utilize one

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GENWAL feels that the initial aquatic study and report provides sufficient baseline data (Appendix 3-2). Additional studies have been performed in 1994. ~~GENWAL agrees to conduct an additional aquatic macroinvertebrate study in the spring and fall of 1997 (as agreed to by the Price Office of the Forest Service). Thereafter, GENWAL will conduct additional monitoring in the spring and fall of 2000 and every three years thereafter for the life of the mine (unless the study data indicate a different schedule) and in the fall of 2009.~~ The company commits to continue to conduct macroinvertebrate studies twice yearly, in the spring and fall, until the Division and US Forest Service agree that sufficient data has been collected.

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