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DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

April 10, 2012

Outgoing
C0250005
#4066
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Larry Johnson, Alton Coal Development
Alton Coal Development, LLC
463 North 100 West, Suite 1
Cedar City, Utah 84720

Subject: Notice of Intent to Conduct Minor Exploration, Alton Coal Development, LLC, Coal Hollow Mine, C/025/0005, Task ID #4066

Dear Mr. Johnson:

The above-referenced Notice of Intent is not considered to be complete for the following reasons. A revised Notice that addressed these issues should be submitted.

1. The total disturbed area cannot be determined. There is no discussion of disturbance associated with side roads to each drill pad.
2. Right of Entry Information in Volume 7 in the Permit for the Coal Hollow Mine does not appear to cover the same area where the applicant is proposing to drill as indicated in Notice of Intent. Right of Entry information for the proposed drilling area needs to be provided.
3. The Notice of Intent does not provide adequate sediment control information as required by R645-201-225.
4. Map 2.6 of the Alton Coal Lease by Application DRAFT EIS shows grouse nesting areas in the area of the proposed drilling. Sage grouse is considered high value wildlife (R645-202.231). The Applicant needs to address how sage grouse will not be affected by exploration.
5. R645-202-232, needs to be addressed relative to roads.
6. R645-202-235, needs to be addressed. It is also recommended that the Applicant consider converting at least two of the exploration holes to water monitoring wells. This would help in the permitting of this area in the future. The location of any such wells should be determined with input from the Division Hydrologist.



7. A portion of the exploration area is considered to be a probable Alluvial Valley Floor (See Map 2.2 of the Draft EIS). While this does not preclude exploration, the Applicant should gather information to address this issue for the permitting of this area in the future.

8. Maps in the Letter of Intent have no scale.

9. In accordance with R645-201-225 the Notice of Intent must describe the practices that will be followed to protect the area from adverse impacts of the exploration activities and to reclaim the area. Areas where the ground has been compacted by exploration should be ripped and seeded.

If you have any questions, please feel free to call me at (801) 538-5325 or (Stephen J. Demczak) at (435) 613-3732.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock". The signature is written in a cursive style with a large initial "D" and a stylized "H".

Daron R. Haddock
Coal Program Manager