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DIV. OF OIL, GAS & MINING

m/001/027

Mari A. Pritchard Parker
5905 El Mio Drive
Los Angeles, CA 90042
May 22, 1997
213-550-1639

Mary Ann Wright
Assoc. Dir. of Mining
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

Dear: Ms. Wright:

This letter is in response to the "Notice of Tentative Decision to Approve No. M/001/027", in the matter of a tentative decision to approve a mining and reclamation plan for Pearl Queen Perlite Corporation's Pearl Queen Perlite Mine, Beaver County Utah.

I am an archaeologist in the state of California, but I am familiar with the archaeology of the Bailey Ridge area around the Pearl Queen Mine (I am the granddaughter of Edward Schoo, who first opened and operated that mine). I still maintain my family home in Milford, where I spent summers as a child in the early 60's wandering the hills with my grandfather (a self-taught prospector and miner). Over the past several years, I have conducted reconnaissance work on my own in that area, in preparation for a Ph.D. project in archaeology on the prehistoric obsidian quarries on Bailey Ridge.

I've obtained copies of some of the reports on the area from the Kern River Pipeline project, which runs through the Milford Valley at the base of the Mineral Mountains. This work focused primarily on the pipeline right-of-way at the base of the Mountains, and did not cover the prehistoric quarry sites that I've identified on Bailey Ridge.

Last year, I visited Barbara Frank, of Southern Utah University in Cedar City, to go over the maps and archaeological records of the area. It appears that the prehistoric quarry area directly south of the area designated as "Mining Area (Years 1-3)" on a map provided by Danny Gatten of Pearl Queen Perlite Corporation, though generally known about, has never been officially recorded as a prehistoric obsidian quarry site. In addition, I have identified large prehistoric quarry and habitation areas further up Bailey Ridge toward the source vent of the perlite and obsidian flow.

I am formally requesting copies of pertinent Environmental Impact Reports and any cultural resource assessments, particularly

archaeological assessments, detailing what measures have been taken to comply with Section 106, federal regulations and the State of Utah antiquities laws on this area for this mining development. During my meeting with Danny Gatten on May 19th, 1997, in Milford, it appeared to me that these items have not been addressed and that the archaeological value of the Bailey Ridge area has been missed or overlooked. It is possible that the mining development of this area could irrevocably damage the prehistoric quarries, lithic reduction areas and habitation sites if a thorough cultural resource mitigation study has not been conducted.

Sincerely,

Mari A. Pritchard Parker, M. S.
Archaeologist

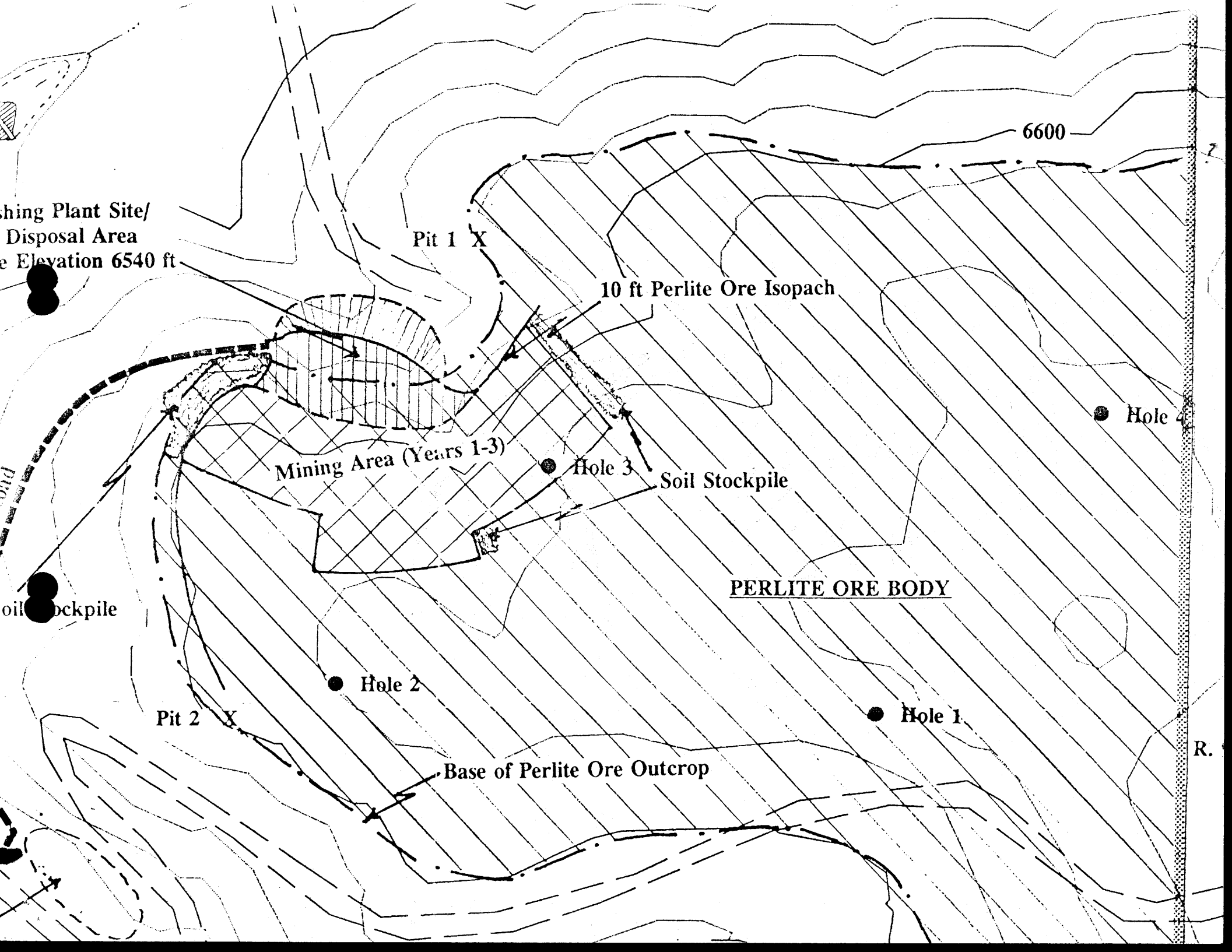
cc:

Danny Gatten
Pearl Queen Perlite Corporation
PO Box 490
533 S. Industrial Loop Rd.
Milford UT 84751

Jesse D. Jennings
21801 Siletz Hwy.
Siletz, OR 97380

Gardiner F. Dalley
Bureau of Land Management
Cedar City, UT 84720

Todd Prince
Park Manager
Iron Mission State Park
585 North Main Street
Cedar City, UT 84720-2643


6600
shing Plant Site/
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e Elevation 6540 ft
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10 ft Perlite Ore Isopach
Hole 4
Mining Area (Years 1-3)
Hole 3
Soil Stockpile
oil ockpile
PERLITE ORE BODY
Hole 2
Pit 2
Hole 1
R.
Base of Perlite Ore Outcrop

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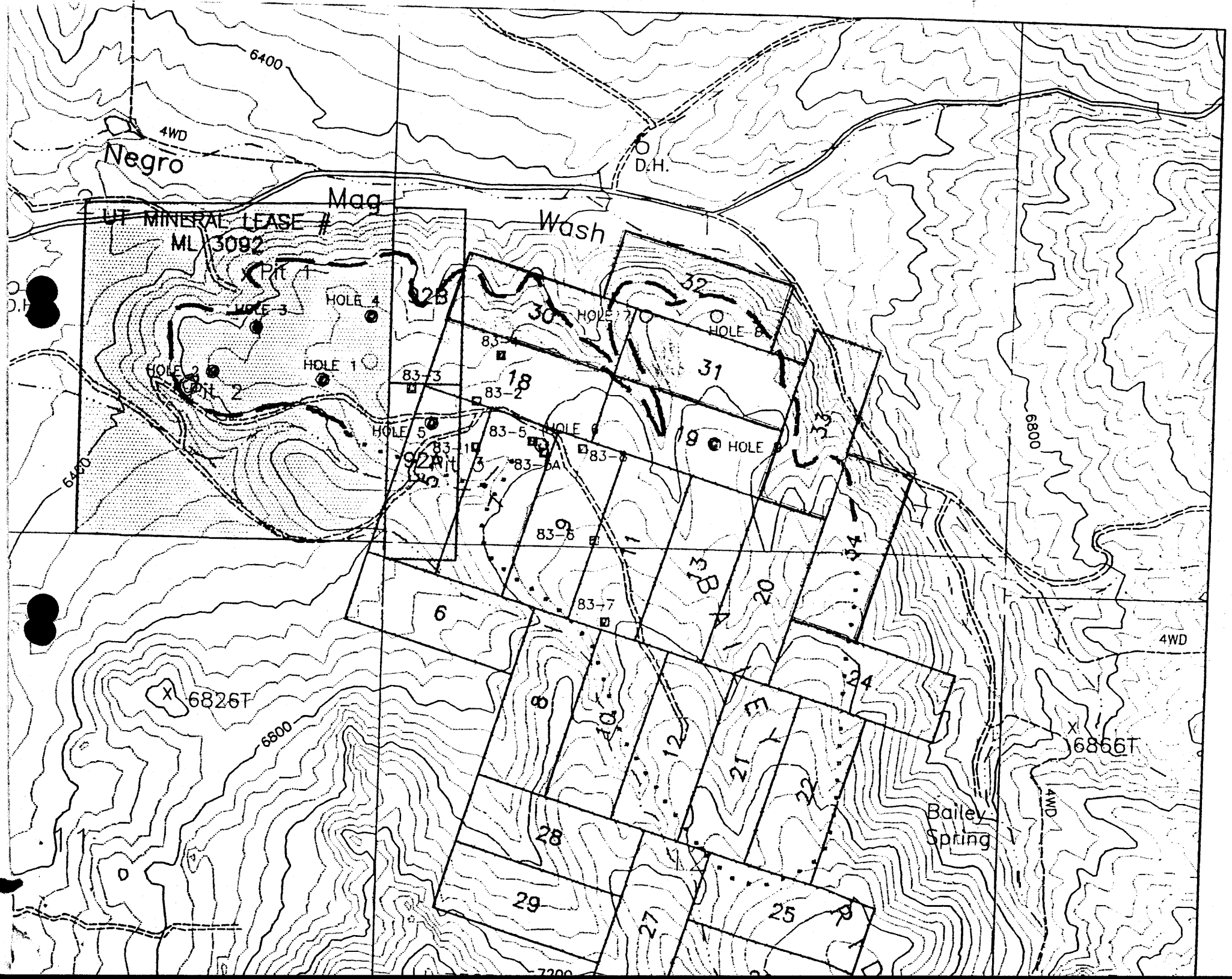

6400
4WD
Negro
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D.H.
UT MINERAL LEASE #
ML 3092
Pit 1
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HOLE 4
HOLE 2
HOLE 1
Pit 2
HOLE 5
HOLE 7
HOLE 8
HOLE 9
HOLE 6
83-1
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83-5A
83-6
83-7
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Spring
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