M001/027

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Carlsbad, California 92008
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May 22, 1997

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DIV. OF OIL, GAS & MINING

GALLEGOS
& Associates

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

RE: "Notice of Tentative Decision to Approve No. M/001/027"

Dear Ms. Wright,

It has been brought to my attention that the Pearl Queen Perlite Mine, located in Beaver County, Utah, may be expanded by the Pearl Queen Perlite Corporation. Your office is considering approval of these expansion/reclamation plans. I would like to recommend that a cultural resource study be required prior to approval.

The area around the existing perlite mine contains numerous obsidian flows. Obsidian is a natural glass, highly prized and sought by the prehistoric inhabitants of the Desert West. I had an opportunity to visit these obsidian outcrops in 1993 and observed that where ever the obsidian flows reached the surface, prehistoric people quarried the material for tools such as knives, scrapers, and drills and implements such as arrow and dart projectile points. There are numerous techniques for manufacturing tools from raw material; the technique specific for this area is unknown. The area is of major importance in regard to determining prehistoric technological trajectories, a subject that only recently has been studied. I have discussed this with Dr. J. Jeffrey Flenniken, lithic technology specialist of Lithic Analysts and Washington State University, and Dr. Jeanne Binning, noted lithic technologist and Staff Archaeologist, State Historic Preservation Office, West Virginia. They agree that this is an important area. Dr. Binning served as lithic specialist for a pipeline that passed near the area.

Similar quarry areas occur throughout the western United States but are regionally specific as to manufacturing trajectories. The method of reduction/production depends not just on the intended tool, but also on socially accepted, enculturated ideas as to the "correct" way to do something (driving on the right side of the road in American and on the left side in Europe). The prehistoric quarry areas around the perlite mine need to be investigated, prior to destruction by modern man. If they are destroyed without investigation, that knowledge can never be regained.

Sincerely,

Adella Schroth

Adella Schroth, Ph.D., Lithic Specialist

CC: Danny Gatten, Pearl Queen Perlite Corporation
Gardiner F. Dalley, Bureau of Land Management
Todd Prince, Park Manager, Iron Mission State Park
Mari Pritchard-Parker, Archaeologist