GENEVA STEEL

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January 20, 1995

RECEIVED
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DIV OF OIL, GAS & MINING

Division of Oil, Gas and Mining
Dept. of Natural Resources
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Attn: Wayne Hedberg

Dear Mr. Hedberg:

Included with this letter is the Updated Application for Revision and Amendment to Geneva's current Iron Mountain Reclamation Permit (M/021/008) for your review. This update was completed pursuant to your letter dated November 30, 1994. For ease of review, we have attached a copy of that letter and identified on the letter the location within the body of the application the change or item addressed.

Some items raised in your letter could not be addressed in the body of the application and are more appropriately addressed in this cover letter.

The entire text, with the exception of the Figures and Plates, should be replaced and maps inserted in the appropriate places in the previous submission.

<u>Road to the Blackhawk Lean Ore Pile (Iron Mountain Livestock Road)</u>

A question was raised that there was no statement justifying post-mine use of the road that leads to the Blackhawk Lean Ore Pile. Geneva has referred to this road as the Iron Mountain Livestock Road in the cover letter of September 9, 1994. In that letter, a brief explanation of justification was given as to the use of that road in the last paragraph of this letter. We apologize for the misunderstanding. Appropriate references to the official title of this road as the Iron Mountain Livestock Road have been made in the text.

Variance Interpretation

M/021/003 and M/021/003 [Original USX properties]

An issue was raised on the pits and waste dumps. Geneva would like to clarify that a review of the permit application and approval indicates that this variance is not limited to the Mountain Lion Pit and Dumps but also is applicable to the homestake pit and dumps.

An issue was raised involving variances under Role M-10(3),(8), and (13). These variances were specifically identified in a letter and a completed MR form 8 document to K. Michael Thompson of DOGM from C.F. Beukema dated August 22, 1978 in response to a request dated June 15, 1978 from DOGM (*Geneva has been unable to locate this requested document). It is Geneva's understanding that U.S. Steel clearly indicated that these variances reflected what was originally included in the application which was reviewed by DOGM (December 24, 1980) and approved on May 25, 1982.

An issue was raised regarding the applicability of the 70% revegetation standard. US Steel pointed out in it's original application that topsoil was not present. In Rule m-10(12)(3) which existed at the time of the submittal, exceptions were available to the revegetation standard where no topsoil existed after all "practical land treatments" had been attempted.

In a letter from the Division dated January 27, 1977, (page 4) it was indicated that "(T)hough providing a minimal cover of beneficial vegetation on a prepared plant support material it is more assured that a beneficial use will again be provided by the land involved." Geneva has committed to perform the "practical land treatments" and more. However, Geneva believes that US Steel understood this commitment was prefaced with the understanding that the 70% standard would probably not be able to be met on the Pre-Act disturbed areas.

M /1021/005 [Original C.F. & I. Properties]

An issue was raised regarding the applicability of the 70% revegetation standard. An Executive Summary document from DOGM dated April 18, 1980 states that the reclamation objective is "...to obtain self sustaining vegetative cover consistent with post mining land uses...". Due to the lack of large amounts of topsoil, the revegetation philosophy will be to treat waste dump material by using such methods as scarifying, using mulch, and fertilizing to develop a suitable plant support medium."

As discussed above, this is an exception to the 70% standard under Rule M-10(12)(3) where "practical land treatment" must be attempted in lieu of the 70% standard.

M /1021/001 [Utah Intl. Properties]

An issue was raised involving the varying of the seed mix and drilling along contours. This language is taken directly from the June 1977 Mining and Reclamation Plan submission, pg. 29, Section 13, and pg. 30, Section 15.

Sincerely,

Lance Hale

Lance Hale
Environmental Engineer

LH/mr
Enclosure
cc: Roy Benson, w/o enclosure
K.C. Shaw, w/o enclosure
Richard Clayton, w/o enclosure

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REVISED

MINING AND RECLAMATION

PERMIT APPLICATION

(Prior Permit No. M/021/008)

FOR THE

IRON MOUNTAIN MINING

DISTRICT

NEAR CEDAR CITY, UTAH

~~August 18, 1993~~
January 13, 1995

THIS VERSION OF THE PLAN WAS REPLACED BY THE MARCH 21, 1995 VERSION