



JON M. HUNTSMAN, JR.  
*Governor*

GARY R. HERBERT  
*Lieutenant Governor*

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
*Executive Director*

### Division of Oil, Gas and Mining

JOHN R. BAZA  
*Division Director*

M0350026

December 1, 2008

CERTIFIED RETURN RECEIPT  
7005 2500 0000 4801 7109

Carl Clyde  
Geneva Rock Products  
1565 West 400 North  
P.O. Box 538  
Orem, Utah 84059

Subject: Reclamation Surety and Responses to Public Comments, Geneva Rock Products, Point of the Mountain Quarry, M0350026, Salt Lake County, Utah

Dear Mr. Clyde:

The Division is working to address three public comment letters received in response to the tentative approval notice for the Point of the Mountain quarry. We appreciate the responses you have supplied through your consultant, JBR Environmental. Additional information is needed to fully address the concerns raised.

1. Zoning. According to a map provided by Draper City, portions of the existing mine and of Phase 1 are within areas zoned CR (Regional Commercial) and A5 (Agricultural). Draper City indicates mining is not allowed within these zones. Please explain what steps you will take to comply with local zoning ordinances. Future phases are also outside the zone that allows mining (M2 Heavy Manufacturing).
2. Air Quality. The Division of Air Quality indicates there is an amended Air Quality Approval Order dated August 27, 2008. Please include this latest Approval Order as an appendix to the mine plan. In addition, rule R647-4-109.4 requires that you show what impacts the mining operation is likely to have on air quality and what measures you will take to mitigate these impacts. The Division suggests that you include the table of Best Available Control Technologies from the Approval Order in the plan because these are the methods to be used to mitigate impact
3. Blasting and Vibration. Please provide in the plan additional information about blasting and how blasting is monitored.
  - a. What are the results (in inches/second) of vibration monitoring, and what are the trigger limits of the monitors?
  - b. Where are the seismic monitors placed? Please provide a map with the locations of monitors, houses, and point of initiation.



- c. Have any of the home sites that have noted vibration been monitored?

The plan is required to contain a general narrative description identifying potential surface and/or subsurface impacts. The *minimum* requirements are listed in R647-4-109. Blasting in this area near a residential development is a potential impact that needs to be addressed.

4. Concurrent Reclamation. Please identify what areas have been reclaimed and what areas will be reclaimed within the next five years. Figure 3 shows one reclaimed area; are there any others? The Division recognizes that it takes some time to completely mine an area before it can be reclaimed, but we would like to see a plan, including an approximate timetable, showing where mining is occurring and how equipment can be consolidated and mined areas reclaimed to minimize the amount of disturbed area and better control fugitive dust.
5. Slope stability. Is the mine likely to affect the stability of slopes on which houses and businesses are built?

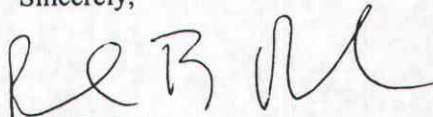
Please provide a response to these issues no later than December 22, 2008.

On a separate issue, the Division issued tentative approval on October 13, 2008, requiring that you submit a reclamation surety but did not give a deadline. The Division currently holds a reclamation surety in the amount of \$566,118.00, but the amount required is \$938,346.00. Because this is an existing mine and is not adequately bonded, we have decided to give a deadline for submitting the reclamation surety and reclamation contract.

Please submit the surety and contract by January 5, 2009. To obtain the reclamation contract and documents associated with the surety, please contact Penny Berry at 801-538-5291 or by e mail at [bondcoordinator@utah.gov](mailto:bondcoordinator@utah.gov).

Other questions about this letter can be directed to me at 801-538-5261 or by e mail at [paulbaker@utah.gov](mailto:paulbaker@utah.gov). Thank you for your cooperation in resolving these issues.

Sincerely,



Paul B. Baker  
Minerals Program Manager