File: Atlas Minerals' Mines
Copy to Tom T., Tom P., Sue
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Atlas Minerals

Division of Atlas Corporation

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May 25, 1982

James W. Smith, Jr., Coordinator
Mined Land Development
Division of Oil, Gas and Mining
Room 4241, State Office Building
Salt Lake City, Utah 84114

ACT/037/023

Re: Atlas Revegetation Approach.

Dear Mr. Smith:

This correspondence addresses Atlas Minerals' (Atlas) proposed alternative to test plots for determining the most appropriate methods to be used in revegetating lands affected by mining activities at Atlas Mines.

As we discussed in our meeting on May 11, 1982, there are several good reasons for taking an alternative approach to revegetation of mined lands. To reiterate, they include:

- There is a substantial body of pertinent research literature and data available today that was not available a few years ago.
- Test plots initiated this year would not yield conclusive or valid data for another three to five years.
- It would be more cost-effective to apply available resources to reclamation of disturbed lands rather than research plots.
- Results could be evaluated in actual circumstances rather than in a "test" situation.
- Actual reclamation activities will be commenced, at least on a limited basis, within the next twelve months.

Based on these and other considerations, we have reassessed our position regarding test plots and recommend the Division consider the following approach as an acceptable alternative.

ATLAS ALTERNATIVE REVEGETATION APPROACH

1. Atlas will consult a recognized and reputable professional for the purpose of developing a revegetation methodology which will be based on the available research data and literature on the subject of revegetation of mine waste in arid and semiarid climates in the Western United States.

2. This methodology will be submitted to the Division for review and approval approximately three months after the Division formally accepts this alternate approach.

3. Upon acceptance of the proposed methodology by the Division, Atlas will initiate same at a mine to be designated in the proposed methodology.

4. Upon satisfactory demonstration of the methodology, Atlas would then amend such Mining and Reclamation Plans as appropriate.

We recognize that this change in approach may cause some administrative complexities within the Division and hope that there is sufficient flexibility to allow for such a change. Furthermore, we would hope that once this activitity gets underway, the Division Staff will be available for periodic field reviews and conferences on this matter.

We trust this proposed alternate approach is acceptable. We feel it is an improvement over the test plot approach and that it satisfies the intent and objectives of the Mined Land Reclamation Act and Rule M-3.

Please contact me at your convenience if you have any questions. We look forward to hearing from you in the near future.

Yours very truly,

Richard E. Blubaugh

Richard E. Blubaugh
Regulatory Affairs Manager

REB:cf

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