State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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January 12, 1998

Ron Ryan
SF Phosphates Ltd.
9401 North Highway 191
Vernal, Utah 84078

Re: Scoping Plan - Proposed New Tailings Storage Facility, SF Phosphates Ltd.(SF), Vernal Phosphates Operations, M/047/007, Uintah County, Utah

Dear Mr. Ryan:

Thank you for including the Division in the Scoping Plan Meeting held November 20, 1997. The project overview for the new tailings storage facility (TSF) was helpful and the pro-active permitting approach being taken by SF is admirable and refreshing. Thank you for SF's hospitality at the meeting.

Realizing this is a preliminary document meant to provide a general overview of the proposal, the Division has a number of comments which should be addressed in the more specific TSF proposal. These comments are general and are not intended to constitute a full review according to the Minerals Rules. These comments are listed below.

1) *More information describing the final reclamation of the impoundment surface (i.e. stability, radioactivity, etc.) will need to be provided . The ultimate post-mine land use (livestock grazing, wildlife habitat, or recreation) of the reclaimed TSF will depend on the tailings impoundment's ability to support those uses. Any disassociation of tailings material (fines versus coarse materials) may cause long term stability problems for surface construction. The occurrence of radioactive components within the tailings may preclude the construction of any post-mining housing due to build up of radon daughters in enclosed buildings. Information and experience gained from reclamation of the existing impoundment should be utilized in developing a reclamation plan for the proposed TSF.*

2) *Specific details of drainage crossings associated with the new tailings pipeline and the long term stability of those crossings will need to be provided, as well as reclamation of the pipeline corridor.*

3) *Details of the final reclamation surface water drainage system will need to be provided. Information describing the post-mine erosion of the tailings material will need to be provided.*

4) *More geologic mapping of fractures or faults in the area will need to be provided.*

5) *The specific details of the TSF dewatering system and embankment design will need to be provided.*

6) *More information describing the location and method of tailings deposition will need to be provided. The method of tailings deposition and the tailings composition will affect the surface stability of the reclaimed surface and may affect the reclamation success.*

Based on the information provided, there appears to be no major drawbacks with locating the TSF at Site B according to the Division's Minerals Rules. As a general comment, this site appears to be a good location due to the lack of groundwater and surface water.

Given that Site B is on lands managed by the BLM, the BLM Vernal Field Office would be considered the Lead Agency under the current MOU between the Division and the BLM. This means ideally, that the Division would channel comments through the BLM who would then forward the information to SF or include the Division's comments in BLM review documents.

The Division's Minerals Rules do not specifically require our review to follow the NEPA process as the BLM does; however, the Division would need to be included in the EA or EIS review.

The Division's regulations focus mainly on reclamation of the disturbed areas. We realize that it is difficult to provide a detailed reclamation plan for the proposed TSF at this early stage of development. We suggest some effort be made towards developing a conceptual reclamation plan and post mine land use for this area. Data and experience gained from reclamation of the existing tailings impoundment should be utilized as much as possible. The initiation of a formal revegetation test plot program on the existing tailings impoundment is highly recommended. We suggest designing the proposed TSF for final reclamation as much as possible.

Current Division permitting time frames for a large mine proposal such as this can require six months to a year from the time of initial submission. A reclamation surety is required prior to initiating operations disturbing more than five acres of surface area. The Division must present reclamation sureties to the Board of Oil, Gas and Mining for approval at the monthly Board Hearings.

Thank you for this opportunity to provide comments on your project proposal.

Sincerely,

Anthony A. Gallegos
Senior Reclamation Specialist

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cc: Pete Sokolosky, BLM Vernal Field Office
Tim Thompson, JBR
sf-scope.let