M/047/010

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Utah State Office
P.O. Box 45155
Salt Lake City, UT 84145-0155
www.ut.blm.gov

IN REPLY REFER TO:
UTU-0126943
(UT-923)

JUN 0 4 2004

CERTIFIED MAIL--Return Receipt Requested
Certification No.

Mr. Earl White
American Gilsonite Company
HC 73 Box 28
Vernal, Utah 84078

RECEIVED
JUN 0 8 2004
DIV. OF OIL, GAS & MINING

Re: Mining Plan Federal Gilsonite lease UTU- 0126943

Dear Mr. White:

On April 28, 2004 we received a copy of your mining plan for Federal Lease UTU-0126943 on the Wagon Hound vein. Based on our review of the plan we have the following comments on the mining plan.

1. 30 CFR 57.11050 requires that "Every mine shall have two or more separate, properly maintained escapeways to the surface." 30 CFR 57.4131(c) states "Dry Vegetation shall not be permitted within 25 feet of mine openings." Your plan needs to show compliance with these requirements.
2. Your plan needs to discuss the drilling of the escape shaft which you propose on the Federal lease. This includes, but is not limited to the size of the escapeway, how it will be drilled, the disposition of the drill cuttings, mode of travel of the drill rig, access or roads necessary and the length of time needed to do the work, clearance of vegetation around the escapeway for drilling and for maintenance of the escapeway, method of securing the escapeway, timing on when the escapeway is needed, timing if the escapeway will be turned into a production/men and materials shaft.
3. To facilitate NEPA, the following information should be included in the mining plan. Vegetation, climate and air quality, indigenous wildlife including T&E species, past and present land use, surface waters, soils and subsoils, improvements that may be impacted, archeology or cultural sites and water impoundments. If your NPDES permit requires water samples, a discussion of the parameters to be analyzed and frequency of collection should be put into the

4. LM does not consider a cap to be an appropriate method to close any shaft. A statement that the escapeway will be sealed in a proper manner and approved by BLM will be sufficient. Methods may include caps, plugs etc. The plan currently provides that the lessee will broadcast seed in appropriate quantities as prescribed by the AO, but this may take many applications. The plan should also identify the season the seed will be broadcast and whether disking or ripping the soil will be preformed in order to allow proper seed beds to be made. The plan should also address how noxious weeds will be controlled on the reclaimed site and ensure that this will take place until they are released. Along with this discussion, a monitoring plan should be provided to address how the site will be monitored until 70% re-vegetation is established (quantity, species and cover).

5. Figure 1 does not show the mine workings correctly. There has been a drift driven approximately 500 feet into the vein at approximately the depth of the WH-17 mine. This also does not correctly show the mining sequence because of this drift. Please up date this figure to correctly show the mining.

If you require further information please contact Mr. Stan Perkes, (801) 539-4036.

Sincerely,

/ James F. Kohler

James F. Kohler
Chief, Solid Minerals Branch

cc: Vernal Field Office
Utah Division of Oil, Gas, and Mining (Attn. Doug Jensen)