Incoming
M/047/0090
TASK 3514

Grand County
Utah

GRAND COUNTY COUNCIL MEMBERS
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April 20, 2010

Ms. Dana Dean
Associate Director of Mining
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

RE: Tentative decision to approve a large mining and reclamation plan for Earth Energy Resources, Inc., at PR Spring Mine No. M/047/0090 in Uintah and Grand Counties

Dear Ms. Dean,

Thank you for the notice of intent and comment period regarding the proposed mining operation at PR Springs. Grand County would like to take this opportunity to officially reiterate the prior communications sent by the Grand County Community Development Department. At this stage, it is Grand County's prime concern that Earth Energy Resources comply with our County Land Use Code by applying for and gaining approval of a Conditional Use Permit. It is Grand County's hope that the applicant, UDOGM, and Grand County will work together to insure the below concerns are properly mitigated:

1. Offsite impacts – Haul routes, traffic, and other road impacts.
2. Building Permits
3. Other safety considerations (blasting, signage, police and fire)
4. Infrastructure needs (utilities and easements)
5. Nuisance considerations (noise, smell, visual impacts)
6. Safety and sanitation of personnel accommodations

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Of particular concern:

7. Storm water engineering, water availability, and general water quality concerns
   Grand County would like to ensure that significant storm events do not present a potential ground or surface water pollution source either during the mine's operation or after reclamation. The constituency of the waste should be carefully considered with regard to its potential long range effects on water quality.
8. Waste Storage
   Grand County would like to ensure that waste storage is not environmentally detrimental due to its constituency, arrangement, or engineering. As relocating or otherwise mitigating a poorly designed waste storage element in such conditions would be very expensive and technically infeasible it is very important that it be done right the first time. We also have concerns about the level of reclamation possible for such a proposed waste storage area.

9. Site Reclamation

The proposed process and feasibility of the reclamation plan is rather vague. Reclamation with regard to strip mining varies widely in effort and end result. It is in Grand County's interest that a site reclamation plan be drafted which ensures the feasibility and availability of all materials and practices. The end result should be stable, non-polluting, and, as close to natural as possible.

As this mining project is the first in a rather large potential tar sands deposit (as identified by the US Geological Survey), Grand County believes that this project should set a precedent which ensures that, if this resource proves viable, an equitable position between energy production and environmental preservation will prevail. It is Grand County's hope that UDOGM will proceed cautiously and with great forethought in regulating this emerging industry. Thank you again for the opportunity to comment.

Sincerely,

Audrey Graham

Audrey Graham, Chair
Grand County Council