STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

April 16, 1982

Mr. William B. Booth
Environmental Affairs Office
Sunshine Mining Company
P.O. Box 1080
Kellogg, Idaho 83837

RE: Burgin Project
ACT/049/009
Utah ~~Utah~~ County, Utah

Dear Mr. Booth:

The Division has completed the review of the Revised Notice of Intention to Commence Mining Operations for Sunshine Mining Company's Burgin Project submitted in January 1982 and discussed during the last few months with Carl Johnson. Based upon the fact that generating this report was instigated in response to the Division's initial review the majority of concerns have been addressed. However, there still remain a few areas to which we would like to direct your attention.

1. There is still not a definite standard that has been set for revegetation on sites other than the waste-rock pile (i.e., road fill slopes, pad for substation and water tank, area excavated behind the hoist building). It would be to the advantage of Sunshine Mining Company to determine a baseline cover figure by running three to five vegetation transects in late spring or early summer. These should be taken in an area preferably without a heavy Pinon-Juniper overstory (P-J cover shouldn't be measured).

2. The seed mix used in previous fall seeding should be used in spring seeding and in all reseeding except on the waste-rock pile. The mix the Division recommended was strictly for test plots. Crested wheatgrass should not be used in the seed mix as it has already been applied to the topsoil stockpile.

3. A three-year revegetation monitoring period has not been taken into account in the surety cost estimates and will become an added factor when this is determined.

4. On Page 23 of the January 1982 report certain soil nutrient recommendations were given. Where were these derived from? (Paragraph four "micronutrient" should probably be changed to macronutrient?) Also, what is the depth to which topsoil will be replaced and what is the area that will be covered by the topsoil?

Board/Charles R. Henderson, Chairman • John L. Bell • E. Steele McIntyre • Edward T. Beck
Robert R. Norman • Margaret R. Bird • Herm Olsen

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5. The Division's bond estimate form has been included with this letter. It incorporates Sunshine's calculations with some additional values. The estimate also builds in a 13% inflation factor currently used by the Division as an economic safeguard. After the period of three years for the predicted phase of mine life a revision of this surety, as well as the mine plan, will be conducted.

If any questions arise due to the nature of this response, please contact me. Upon adequate submission of data to satisfy our recent review the Division will prepare to go before the Board of Oil, Gas and Mining for tentative approval and hence, publish a notice for the thirty-day public comment period. The Board will meet usually on the fourth Thursday of every month but requests plans be submitted to them at least two weeks prior to that time. The Division will need at least one week to prepare that submittal. I hope these time constraints will aid you in future planning.

Sincerely yours,

THOMAS N. TETTING
ENGINEERING GEOLOGIST

cc: Carl Johnson
Burgin Project
Eureka, Utah

Encl: a/s

TNT/cp