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**INTEROFFICE MEMORANDUM**

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**TO:** ROB ZUBER  
**FROM:** JANET BINNS  
**SUBJECT:** KING I & II MINE, RN7 REVIEW  
**DATE:** 5/1/2017  
**CC:**

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I have reviewed the King I and II Mine permit for Sections 2.04.9, 2.04.10, 2.04.12, and 2.05.4. I also referenced the RN6 Findings and MT7 Findings.

I find the permit in compliance with Rules: 2.04.9 for both the King I and King II sections.

Both King I and King II Sections 2.04.10 are in compliance with the Rule 2.04.10.

- Please have GCC assure that the threatened and endangered plant species is up to date.

The operator has demonstrated that there is no prime farmland at either King 1 or King II. The permit is in compliance with Rule 2.04.12.

Reclamation plans and reclamation success standards are found in Section 2.05.4 for both King I and II. The Division finds this section in compliance for King I.

- Although not out of compliance, the discussion of the reclamation success standards for total vegetative cover and total herbaceous production found on King II, Section 2.05.4 p.15 and 16, is written in vague language. It has been the Division's experience that clear concise definition of the reclamation success standards in the permit reduces misinterpretation and disagreement at bond release. The Division suggests rewording, or additional definition similar to the statements in the RN6 Findings document:

Revegetation success criteria for the King II Mine based on the results of a pre-mining vegetation survey. The criteria will provide an adequate basis for verifying the ability of the revegetated lands to support the post-mining land uses of rangeland and wildlife habitat.

Cover – A statistical comparison of samples of total vegetation collected from revegetated areas and a rabbitbrush/big sage mixed shrubland reference area. Student's t test will be used to test the null hypothesis that the sample mean for revegetated parcel cover is equal to or greater than 90 percent of the value of the corresponding cover success criterion, in accordance with Rule 4.15.7.

Production - A statistical comparison of samples of total herbaceous production collected from revegetated areas and a rabbitbrush/big sage mixed shrubland reference area. Student's t test will be used to test the null hypothesis that the sample mean for revegetated parcel production is equal to or greater than 90 percent of the value of the corresponding production success criterion, in accordance with Rule 4.15.7.

- During the Division Midterm No. 7 review, February 18, 2015, the Division asked that GCC provide additional detail regarding the reference area at King II. GCC partially responded to this request. GCC failed to provide text or definition in the map legend of Map 006 regarding the size of the reference area. The Division request the operator define the size of the reference area at King II.

I will provide you an update of the Reclamation Cost Estimate in a separate letter.