

Office of Surface Mining Reclamation and Enforcement

Annual Evaluation Summary Report

for the

Regulatory

Program

Administered by the State

of

COLORADO

for

Evaluation Year 1996

(January 1, 1996, through September 30, 1996)

December 19, 1996

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I. Introduction

The Surface Mining Control and Reclamation Act of 1977 (SMCRA) created the Office of Surface Mining Reclamation and Enforcement (OSM) in the Department of the Interior. SMCRA provides authority to OSM to oversee the implementation of and provide Federal funding for State regulatory programs that have been approved by OSM as meeting the minimum standards specified by SMCRA. This report contains summary information regarding the Colorado program and the effectiveness of the Colorado program in meeting the applicable purposes of SMCRA as specified in section 102. With this report, OSM has again transitioned the annual report time table. This year's report covers the period January 1, 1996 to September 30, 1996. Future reports will coincide with the Federal fiscal year; October 1, through September 30. Detailed background information and comprehensive reports for the program elements evaluated during the period are available for review and copying at the OSM Denver Field Office.

The following is a list of acronyms used in this report:

AHR	Annual Hydrologic Report
BLM	Bureau of Land Management
DMG	Division of Minerals and Geology
FTE	Full-Time Equivalent
OSM	Office of Surface Mining Reclamation and Enforcement
SMCRA	Surface Mining Control and Reclamation Act of 1977
WRCC	Western Regional Coordinating Center

II. Overview of the Colorado Coal Mining Industry

Coal bearing regions within the State cover approximately 29,600 square miles, which is 28.4 percent of the total area of Colorado. Coal reserves vary from lignite to anthracite. More than 70 percent is bituminous, 23 percent is subbituminous, 5 percent is lignite, and less than 1 percent is anthracite. The demonstrated coal reserve base is about 17.1 billion tons, or 3.5 percent of the national reserve base. Of this reserve base, an unmineable fraction exists consisting of coal rendered not mineable because it is in or near alluvial valley floors, national parks, historic and archaeological sites, and under towns or properties where surface impacts are a concern. These restrictions are imposed by Section 522 of SMCRA. Some 8.8 million acres of coal rights in the State are owned by the Federal Government; on about 72 percent of this land, the Federal Government controls both the coal and surface rights. All Federal coal is leased by the U.S. Bureau of Land Management (BLM). BLM estimates that approximately 4.2 billion tons of reserve base are under Federal ownership. Recoverable coal reserves held under Federal lease are estimated to be approximately 1.9 billion tons (of which 540 million tons are surface

mineable). On average, 96 percent of Colorado's coal production is obtained from mines on Federal lands.

Commercial coal production first began in 1861, while surface mining for coal began in the early 1950's. Underground production tonnage was first recorded in 1864. Generally, production climbed between 1875 and 1920. The 1 million tons per year milestone was reached in 1888, and the 5 million tons mark was attained by the end of the century. By 1910, production was at 10 million tons annually, and it remained steady until affected by the Depression. Production returned to 5 million tons per year through the mid-1930's. World War II increased production to 8 million tons per year. Following the war, the change to diesel fuel for locomotives and oil for electric production severely reduced the demand for coal, and production ranges remained at 2 to 4 million tons per year through 1963, increased to 8 million tons in 1976, then climbed rapidly to 19.3 million tons in 1981. Coal production declined somewhat through 1988, then climbed back to 19.3 million tons in 1992. The years since have all been record production years. As of September 30, 1996, Colorado had produced 18,388,964 tons of coal compared to 17,405,779 tons produced as of September 30, 1995. It appears as if Colorado will once again set a state record.

Colorado continues to lead the world in record longwall production. The West Elk and Twentymile Mines have traded off the monthly production records for the past few years. The West Elk Mine currently holds the monthly world record of over 700,000 tons produced by longwall mining.

Surface and underground mines employ less than 2000 people. Employment peaked in the early 1980's with 4700 people producing coal. Currently 26 surface mines, 32 underground mines, and 2 facilities are regulated under the approved State program by the Colorado Division of Minerals and Geology (DMG). Eight underground mines and four surface mines were producing coal at the end of the evaluation period. Permitted mine acreage per minesite ranged from 38 to 14,678 acres.

Differences in elevation create many climatic zones. Local annual precipitation can average less than 8 inches in some areas in extreme western Colorado and can average in excess of 30 inches in certain mountainous areas. Generally, precipitation rates are low at most minesites, making revegetation difficult. This problem can be overcome with careful species selection. The growing season can be up to 169 days in length at some sites, but is usually much less, especially in the mountainous regions of the western half of the State.

III. Overview of the Public Participation Opportunities in the Oversight Process and the State Program

LAND USE AND MINING WORKSHOPS

Public outreach was enhanced through Land Use and Mining Workshops which were held in Craig, Fort Collins, and Buena Vista. The workshops introduced DMG to the public, local government agencies, and owners of land within coal mine operations. DMG prepared an information packet, outlining permitting processes and opportunities for comment, which was distributed to meeting attendants. The outreach effort will increase public awareness of DMG and encourage public participation in coal mine permitting. DMG plans three more workshops in 1997.

DMG also plans to have staff members attend and participate in county commissioners meetings throughout the state, for the purpose of developing a mutual understanding of the function and purpose of each agency. A packet of information was developed for DMG staff to use when participating in the meetings. The packet contains a checklist of topics for the DMG representative to cover at the meetings and a listing of times and locations for meetings in each county. Also included is information to distribute to the commissioners which summarizes the purpose, function, and structure of DMG and how the public and other government agencies can become familiar with and be involved in coal mining issues.

PUBLIC AVAILABILITY OF INFORMATION

DMG reviewed and reorganized its public files in the DMG Denver office for all coal mining and reclamation operations. The reorganization ensured that all pertinent documents for permitting actions and correspondence were easily located and made available for public review in the DMG offices.

MINED LAND RECLAMATION BOARD MEETINGS ABROAD

The Mined Land Reclamation Board held two of its monthly meetings away from its regular Denver meeting site. The May 1996 meeting was in Victor, Colorado, and the September 1996 meeting in Leadville. Holding the meetings in the vicinity of the mining operations encouraged public participation by making DMG and the Board more available to the public, and helped DMG and the Board to establish a presence outside of Denver.

IV. Major Accomplishments/Issues/Innovations

RECLAMATION SUCCESS

A primary goal of SMCRA is the successful and productive reclamation of mined lands. One of the methods used to achieve this goal is through contemporaneous reclamation. Contemporaneous reclamation ensures that mined land is once again made productive in an expeditious manner. Among other things, it lessens the degree of impact to topsoil resources by live handling and shortened stockpile times, starts the bond liability time period at the earliest time, and allows more favorable revegetation conditions.

The special topic review conducted by OSM and DMG on contemporaneous reclamation has been completed. The team members have concluded that DMG has successfully implemented the regulatory requirements of the approved Colorado program regarding contemporaneous reclamation and in doing so have eliminated potential associated off-site impacts.

FEDERAL FUNDING POLICY CHANGES

Colorado experienced a negative financial impact as a result of OSM changes to its federal funding policy. Prior to the policy change Colorado's funding share was 83% federal and 17% state. With the implementation of the policy change during the 1996 grant cycle the funding share shifted to 79% federal and 21% state. In order to accommodate the loss of 4% of program funds, the Coal Program had to draft and submit a Budget Decision Item to the Joint Budget Committee, requesting additional General Funds beginning with FY 1996/97. This request was denied.

A second approach involved a legislative bill proposal which would direct a small portion of severance tax revenues to the Coal Program to supplement General Fund monies in order to meet the 21% state funding share requirement. This bill, SB 96-170, passed the legislature with an appropriation for FY 1996\97 and on-going language which will allow the Coal Program to request a severance tax fund portion in future state share budgets.

TOPSOIL REPLACEMENT DEPTH VERIFICATION

During the summer of 1996, DMG began an effort to accumulate data verifying the depth of topsoil which has been replaced at reclaimed coal mines throughout the state. While this data was already available for numerous areas, DMG determined that obtaining data from reclaimed areas where topsoil depths had not been sampled would be helpful in ensuring compliance with approved reclamation plans, and in facilitating reviews of bond release applications from mine operators.

As part of the effort to revise its strategy for completing Annual Bond Compliance Inspections, DMG assessed the extent of data available regarding depths of topsoil which had been redistributed on reclaimed lands at all permitted coal mines. Data was already available for part or all of most mine sites. That data consisted of a combination of data gathered by DMG during past inspections and data submitted by mine operators. Review of existing data indicated that data about past reclamation work was missing for eight mines.

A summer intern was hired to check topsoil replacement depths at those eight mines. Plans were developed for each mine, based on the history of reclamation and the availability of existing data. The primary focus of the project was to verify topsoil replacement depths for reclamation work which had been completed between 1982 and 1995. Topsoil replaced in 1996 was concurrently sampled by other DMG staff during other bond compliance inspections.

From June through August of 1996, 259 core holes were dug in replaced topsoil at eight mines. This sampling covered a total of 2612 acres of reclaimed land, at an average sampling intensity of one hole per ten acres of reclamation. The results of the sampling indicate that topsoil replacement operations in the sampled areas at these mines were done in compliance with the approved reclamation plans. Further analysis of the data from this project will be done during 1997, in conjunction with review of topsoil data from other Annual Bond Compliance Inspections, as part of a comprehensive effort to maintain a data base which is more concurrent with reclamation operations.

OVERSIGHT AGREEMENT

DMG and OSM, as the Oversight Team, developed and implemented an Oversight Agreement for the Colorado Program. The focus of the agreement is the achievement of on-the-ground results which will be evaluated to determine the effectiveness of the Colorado program in implementation of the Colorado Surface Coal Mining Reclamation Act (Act) and the Rules and Regulations of the Colorado Mined Land Reclamation Board for Coal Mining (Rules). The agreement, among other things, calls for the Oversight Team to identify special in-depth studies, issues regarding protection of public health and safety, prevention of off-site impacts, successful reclamation, environmental protection, and public participation. The in-depth studies are to be conducted jointly by the team and will focus on selected functions of Colorado's program which are critical to successful implementation of the Act and Rules. In addition to joint in-depth studies, the agreement also calls for DMG to develop and implement internal reviews of its own performance. The agreement also creates the framework for communication and conflict resolution and information transfer within the Oversight Team, as well as regular sample inspections of Colorado mine sites.

V. Success in Achieving the Purposes of SMCRA as Measured by the Number of Observed Off-Site Impacts and the Number of Acres Meeting the Performance Standards at the Time of Bond Release

To further the concept of reporting end results, the findings from performance standard evaluations are being collected for a national perspective in terms of the number and extent of observed off-site impacts and the number of acres that have been mined and reclaimed and which meet the bond release requirements for the various phases of reclamation. Individual topic reports are available in the OSM Denver office which provide additional details on how the following evaluations and measurements were conducted.

A. Off-Site Impacts:

OSM conducted 11 inspections with at least a partial focus on off-site impacts. No off-site impacts were observed during these inspections. DMG conducted 178 inspections with at least a partial focus on off-site impacts. Violations with off-site damages, or the potential for off-site damages, were observed six times. State Notices of Violation were issued for each occurrence. Three of the violations were deemed to have a moderate impact on water resources, one a minor impact on water resources, and two had minor impacts on land resources. The nature of the violations do not present a discernable pattern. DMG has been successful in deterring off-site impacts from coal mining operations.

B. Bond Release:

Few permanent program mining operations in Colorado have acreage that has been granted a Phase III bond liability release. Determining the success of the Colorado program based on this figure is deceptive because these operations tend to be large and long-lived, many of the operations have reclaimed acreage but have not requested release because doing so would also mean relinquishing control per their leases, more than half of the mines are underground operations where the surface disturbance will not be reclaimed until final closure of the mine, and all of the mines are subject to the 10-year minimum bond liability period.

The contemporaneous reclamation special study undertaken this year did not identify any violations of the performance standards, yet the majority of sites have not had any Phase III releases. One of the conclusions that may be drawn from this is that while these operations are successfully conducting reclamation of disturbed acreages, liability release is not being pursued for the reasons mentioned. The small amount of Phase III acres released compared to the acreage permitted does not represent a reclamation failure in

Colorado.

VI. OSM Assistance

The percentage of program costs for which OSM provides funding is relatively high in Colorado. The majority of mines operate on Federal lands and OSM funds the regulation of these mines through a Federal lands cooperative agreement. OSM provided \$1.57 million dollars to DMG for the evaluation period. This figure represents 81 percent of the total program costs.

OSM continues to provide a wide variety of technical training opportunities for DMG personnel. DMG representatives have attended courses such as SB Slope, Earthvision, and Global Positioning Systems during the evaluation year. WRCC also worked closely with DMG to develop a guidance letter to the industry on operator's responsibilities for distribution of various documents such as permit applications, renewals, and revisions for operations on Federal lands.

VII. General Oversight Topic Reviews

Oversight of the Colorado regulatory program focused on hydrologic quality to assess off-site impacts and contemporaneous reclamation to assess reclamation success. In addition to these topics, four complete inspections were conducted.

The oversight team selected the topics to be investigated and defined the scope of the topic. For purposes of clarity, definitions and measurements were included in the agreement so inspection staff and specialists would be consistent with each special focus inspection. Specific mines and a schedule were agreed upon.

A. Off-Site Impacts - Hydrologic Quality

This topic was identified as a multi-year special focus. OSM utilized a Hydrologist in addition to inspection personnel for this review topic and all field work was completed this season. The final review will be completed in the Spring of 1997 after the mining operations submit their Annual Hydrologic Report (AHR) and the information gleaned from the field review is compared to the AHR data. The focus was to determine how effectively DMG was implementing its approved program to prevent off-site impacts to surface waters which could potentially be affected by mining operations. The definition of an off-site impact is different for each mining operation and is outlined in the Probable Hydrologic Consequences approved as part of the mining permit.

The field review consisted of verification that the operation has installed and maintained all necessary monitoring equipment, is conducting all the required monitoring, and is submitting all the required data. No violations of the performance standards were

identified.

B. Reclamation Success - Contemporaneous Reclamation

OSM completed review of this topic during the evaluation year. OSM utilized a Mining Engineer in addition to inspection personnel for the review. The focus was to determine how effectively DMG is implementing its approved program by compelling contemporaneous reclamation, thereby reducing risk to the public and the environment.

The Colorado regulations define contemporaneous reclamation for surface mines as commencing rough backfilling and grading within 180 days following coal removal and not more than four spoil ridges behind the pit being mined, the spoil from the active pit being considered the first ridge. DMG may also grant a time waiver in accordance with the regulations if the permittee can demonstrate through a detailed written analysis that additional time is necessary. Underground mines, spoil piles, and other surface disturbances are reclaimed in accordance with the approved plan.

The team members conducting the review for each of the three mines selected met prior to the permit review and inspection to organize and plan the review. Permits for three mining operations were reviewed to determine the site specific contemporaneous reclamation requirements. Also reviewed were aerial photographs, annual reclamation reports, maximum disturbance assumptions, and reclamation cost estimates. Field review consisted of matching the site specific contemporaneous reclamation requirements with the backfilling and grading that had been conducted. No violations of the performance standards were found. All of the operations were found to be in compliance with the performance standards and permit requirements.

C. Complete Inspections

Four complete inspections were conducted in Colorado during the oversight year. The inspections were conducted on operations that were not subject to a review under one of the topics listed above and had not been subject to an oversight inspection during the preceding year. While the inspections were conducted as complete inspections, critical attention was paid to the conditions that were reviewed under the special focus topics.

The mines were not selected on a random basis as has occurred in the past. Diversity in such categories as operational status, type of operation, geography, and size was considered in making the selection. No Ten-Day Notices or Federal enforcement actions were taken as a result of these inspections. The operations were found to be in compliance with the performance standards and permit requirements.

Appendix A:
Tabular Summary of Core Data to Characterize the
Colorado Program

TABLE 1

COAL PRODUCTION (Millions of short tons)			
Period	Surface mines	Underground mines	Total
Coal production ^A for entire State:			
1994	8.64	11.56	20.2
1995	8.56	17.47	26.03
1996 ^B	6.81	11.42	18.23

^A Coal production as reported in this table is the gross tonnage which includes coal that is sold, used or transferred as reported to OSM by each mining company on form OSM-1 line 8(a). Gross tonnage does not provide for a moisture reduction. OSM verifies tonnage reported through routine auditing of mining companies. This production may vary from that reported by States or other sources due to varying methods of determining and reporting coal production.

^B For the period January 1, 1996 through September 30, 1996.

TABLE 2

INSPECTABLE UNITS (As of September 30, 1996)												
Coal mines and related facilities	Number and status of permits								Insp. Unit^D	Permitted acreage^A (hundreds of acres)		
	Active or temporarily inactive		Inactive Phase II bond release		Abandoned		Totals					
	IP	PP	IP	PP	IP	PP	IP	PP				
										IP	PP	Total
STATE and PRIVATE LANDS REGULATORY AUTHORITY: STATE												
Surface mines	0	11	0	2	0	4	0	17		0	266	266
Underground mines	0	6	0	0	1	6	1	12		<1	509	510
Other facilities	0	2	0	0	0	0	0	2		0	2	2
Subtotals	0	19	0	2	1	10	1	31	0	1	777	778
FEDERAL LANDS REGULATORY AUTHORITY: STATE												
Surface mines	0	9	0	1	0	0	0	10		0	216	216
Underground mines	0	17	0	0	0	2	0	19		0	616	616
Other facilities	0	0	0	0	0	0	0	0		0	0	0
Subtotals	0	26	0	1	0	2	0	29	0	0	832	832
ALL LANDS ^B												
Surface mines	0	20	0	3	0	4	0	26	0	0	482	482
Underground mines	0	23	0	0	1	8	1	31	0	1	1,125	1,126
Other facilities	0	2	0	0	0	0	0	2	0	0	2	2
Totals	0	45	0	3	1	12	1	60	0	1	1,609	1,610
Average number of permits per inspectable unit (excluding exploration sites)										<u>1</u>		
Average number of acres per inspectable unit (excluding exploration sites)										<u>2,508</u>		
Number of exploration permits on State and private lands:					<u>0</u>		On Federal lands: <u>0</u>					C
Number of exploration notices on State and private lands:					<u>5</u>		On Federal lands: <u>161</u>					C
<p>IP: Initial regulatory program sites. PP: Permanent regulatory program sites.</p> <p>^A When a unit is located on more than one type of land, includes only the acreage located on the indicated type of land.</p> <p>^B Numbers of units may not equal the sum of the three preceding categories because a single inspectable unit may include lands in more than one of the preceding categories.</p> <p>^C Includes only exploration activities regulated by the State pursuant to a cooperative agreement with OSM or by OSM pursuant to a Federal lands program. Excludes exploration regulated by the Bureau of Land</p>												

Management.

^D Inspectable Units includes multiple permits that have been grouped together as one unit for inspection frequency purposes by some State programs.

TABLE 3

STATE PERMITTING ACTIVITY

Type of application	Surface mines			Underground mines			Other facilities			Totals		
	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres ^A	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres
New permits	0	0	0	1	0	76	0	0	0	1	0	76
Renewals	8	3	5,519	3	1	7,840	0	0	0	11	4	13,359
Permit boundary revisions	1	1	-28	0	1	-1	0	0	0	1	2	-29
Revisions (exclusive of permit boundary revisions)	61	79		76	80		5	4		142	163	
Transfers, sales and assignments of permits	0	0		1	0		0	0		1	0	
Full operator assistance	0	0		0	0		0	0		0	0	
Exploration permits	0	0		0	0		0	0		0	0	
Exploration notices ^B	5	3					0	0		5	3	
Totals	75	86	5,491	81	82	7,915	5	4	0	161	172	13,406

OPTIONAL - Number of midterm permit reviews completed that are not reported as revisions

^A Includes only the number of acres of proposed surface disturbance.

late approval not required. Involves removal of less than 250 tons of coal and does not affect lands designated unsuitable for mining. does not distinguish between surface and underground mine exploration.

TABLE 4

OFF-SITE IMPACTS														
RESOURCES AFFECTED			People			Land			Water			Structures		
DEGREE OF IMPACT			minor	moderate	major	minor	moderate	major	minor	moderate	major	minor	moderate	major
TYPE OF IMPACT AND TOTAL NUMBER OF EACH TYPE	Blasting													
	Land stability	1				1								
	Hydrology	4							1	3				
	Enchroachment													
	Other	1				1								
	Total	6	0	0	0	2	0	0	1	3	0	0	0	0
Total number of permits or mine sites with observed off-site impacts: Permits <u>5</u> or Minesites <u>5</u>														
Total number of permits or mine sites evaluated: Permits <u>60</u> or Minesites <u>60</u>														
Total number of observations made to evaluate mine sites or permits for off-site impacts <u>189</u>														

Report the degree of impact under each resource that was affected by each type of impact. More than one resource may be affected by each type of impact. Therefore, the total number of impacts will likely be less than the total number of resources affected; i.e. the numbers under the resources columns will not necessarily add horizontally to equal the total number for each type of impact. To report the number of mine sites or permits use the same criteria used to determine an inspectable unit in the State. Number of observations is based upon the criteria developed between each State and OSM and may include observations by both the State and OSM.

TABLE 5

ANNUAL STATE MINING AND RECLAMATION RESULTS		
Bond release phase	Applicable performance standard	Acreage released during this evaluation period
Phase I	<ul style="list-style-type: none"> ● Approximate original contour restored ● Topsoil or approved alternative replaced 	40.76
Phase II	<ul style="list-style-type: none"> ● Surface stability ● Establishment of vegetation 	34.8
Phase III	<ul style="list-style-type: none"> ● Post-mining land use/productivity restored ● Successful permanent vegetation ● Groundwater recharge, quality and quantity restored ● Surface water quality and quantity restored 	37.62
	Total number of disturbed acres at end of last review period (December 31, 1995) ¹	2
	Total number of acres disturbed during this evaluation year	2
	Number of acres disturbed during this evaluation year that are considered remining	0
<p>¹ Disturbed acres in this category are those that have not received a Phase III or other final bond release (State maintains jurisdiction).</p> <p>² DMG has not tracked this data in the past. The new computer system will track this data starting EY97.</p>		

TABLE 6

STATUS OF RECLAMATION AT REVOKED PERMIT SITES			
Mine	1996 Work	Monies Expended in 1996	Unencumbered Monies Remaining
GEC*	Erosion control, repair of concrete drainage structures, seeding	\$18,550.01	\$483.25
Fruita	Building contour furrows, replacing a culvert, maintaining ditches, seeding	\$7,651.48	\$28,349.00
Hawk's Nest	Weed control	\$737.40	\$4,599.60
Twin Pines	Reclamation success monitoring	\$0.00	\$22,660.00
TBM	Reclamation success monitoring	\$0.00	\$39,084.50
Grassy Gap	Reclamation success monitoring	\$0.00	\$27,639.20
Arness-McGriffin	Repair and seeding of minor erosional problems	\$1,050.00	\$0.00
O.C. No. 2	Backfilling, grading, seeding and mulching about 4 acres	\$19,104.50	\$16,895.50
Coal Basin**	Backfilling and grading 88 acres, topsoiling 13 acres, revegetating 91 acres, and reseeding 15 acres	0 \$404,517.0	\$251,616.00

*The amount of unencumbered monies remaining reported in 1995 (\$12,415.00) was in error; the correct amount was \$19,402.19.

**Monies expended in 1996 are estimated; all final bills have not yet been received.

TABLE 7

STATE BOND FORFEITURE ACTIVITY (Permanent Program Permits)			
	Sites	Dollars	Acres
Bonds forfeited as of January 1, 1996 ^A	2	\$58,660	200
Bonds forfeited during EY 1996			
Forfeited bonds collected as of January 1, 1996 ^A	2	\$58,660	200
Forfeited bonds collected during EY 1996			
Forfeiture sites reclaimed during EY 1996	0	B	0
Forfeiture sites repermited during EY 1996	0		0
Forfeiture sites unreclaimed as of September 30, 1996	2		200
Excess reclamation costs recovered from permittee	0	\$0	0
Excess forfeiture proceeds returned to permittee	0	\$0	0
^A Includes data only for those forfeiture sites not fully reclaimed as of this date. ^B Cost of reclamation, excluding general administrative expenses.			

TABLE 8

STATE REGULATORY PROGRAM STAFFING (Full-time equivalents at end of evaluation year)	
Function	EY 1996
Regulatory program	25
Permit review	19
Inspection	0
Other (administrative, fiscal, personnel, etc.).....	6

The 19 FTE's listed above conduct 50% inspection and 50% permitting. Job classification does not make a distinction between the two activities.

TABLE 9

REGULATORY FUNDS GRANTED TO STATE BY OSM (Millions of dollars)		
Type of grant	Federal funds awarded	Federal funding as a percentage of total program costs
Administration and enforcement	1.57	81
Small operator assistance	0	0
Totals	1.57	