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Ron Hollan
Mining

PLATEAU MINING COMPANY

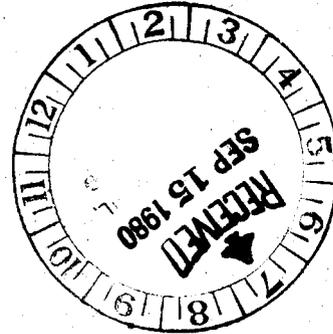
"a subsidiary of getty mineral resources company"

P.O. DRAWER PMC
Price, Utah 84501
Telephone: (801) 637-2875

September 11, 1980

Mr. Joe Helfrich
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, UT. 84116

RE: NOV No. N 80-1-1 1 thru 10
Telephone Conversation 9/11/80



TIS
AAA
DWH
LCS
3/23/81
SL
JLP

Dear Mr. Helfrich:

In confirmation of our September 11 conversation between you and our group of Plateau Mining Company representatives, Ed Thurmond, Mark Adkins, Dan Price and myself, we would like to thank you for your consideration and advice regarding our abatement actions taken in response to recent violations issued by your office. Further, we appreciate the abatement recommendations you made on your field trip last week.

Our conversation today was a follow up of the letter which I sent to Ron Daniels of your office dated September 5, 1980. I think our conversation helped us understand more clearly the effectiveness of our efforts to abate these violations.

I will review each violation as we did over the phone, and relate to you just what we have done to rectify the problems. Everything that we have done is in agreement with the letter of September 5.

NOV #1 - We constructed a small detention pond at the road switchback to control the runoff from the road. A 12" pipe was installed in the pond embankment as an emergency spillway. Any significant amount of water occurring in the pond will be allowed to stand for a minimum of 24 hours. The water will then be pumped out by means of a portable pump.

The storms of the last 5 days have been a good test of this pond. The pond did fill up and seems to be working very well. Sediment is building up on the bottom where the water flows into the pond. We will remove the sediment accumulation as needed.

You indicated to Dan Price on your field visit last week that you were pleased with this type of structure. We feel that they will sufficiently control the amounts of suspended solids leaving the permit area. We have constructed approximately 12 of these structures to date.

NOV #2 - This Fan and Air Intake Pad is accessible only by traveling through the mine. The surface access road was reclaimed previously according to Forest Service Guidelines. As a first effort, we constructed straw dikes perpendicular to the fall line of the pad. We also put straw bales in all drainages leaving the pad. The pad and the down slope have been reseeded.

when?

We will make a detailed study of this pad and determine what measures should be taken to take care of the runoff on a more permanent basis. This study will be followed by a Plan as required by NOV #10 of 10, which will be an addendum to our Mine Plan Application.

NOV #3 - A berm was constructed along the edge of the canyon at the bottom side of the borrow pit. We constructed a temporary detention pond on the bottom side of the pit to catch the runoff and prevent suspended solids from entering the main canyon. Because this pit is active, the pond is only temporary but will be maintained as the level of the pit is lowered. A pond will be maintained at the low point of the pit until vegetation is established and discharge is at an acceptable level.

NOV #4 - The topsoil has been removed, segregated and protected from erosion. We will seed the pile this fall.

NOV #5 - As in #4.

NOV #6 - As in #4 & 5.

NOV #7 - See Attachment A and Exhibit 1.

*M.D. STANLEY
F.S. STAFF*

NOV #8 - At this time we have monitored the flow and collected eleven water samples from springs and streams. We have worked closely with the Manti-LaSal National Forest Supervisors Staff on this Hydrologic Monitoring Plan. Thirteen springs were identified by the Forest Service as being critical to their cattle grazing leases. Part of the eleven samples taken to date are from those thirteen. We will monitor all thirteen on a permanent basis. In addition, we will monitor the springs and streams identified as ongoing monitoring stations by Vaughn Hansen Associates in Hydrologic Inventory of the Plateau Mine and Adjacent Areas, Carbon and Emery Counties, Utah, which is an attachment to our Mine Plan Application. Those ongoing monitoring stations are identified on Figure 10 of said inventory.

We have drafted a plan which covers Hydrologic Monitoring and Subsidence Monitoring. We retained the consulting firm of

Vaughn Hansen Associates to assist us with this Plan. Dr. Hansen has made a review and is working closely with the Manti-LaSal Forest Supervisor on our Plan. We expect to have this Plan finalized by October 15, 1980. We should have all of the spring and stream stations monitored by October 15, 1980.

We appreciate the verbal extension of the time for abatement on this violation (No. 8 of 10), to October 15, 1980.

We have some real concerns with the requirement that the water source be monitored monthly.

- A. Access: Most of the springs are on Gentry Mountain at elevations above 9,000 feet. There are two access roads to Gentry Mountain, Mohrland Canyon and a narrow, steep road originating from our facilities. Both of these roads are improved dirt roads although they are not adequate in inclement weather conditions. From personal experience, I have found that when it rains much more than a sprinkle, you stay off of both of them.

During the winter and spring months, which are generally November through May, access is most difficult. Snows and muddy road conditions will prevent access during those months mentioned.

One might think that samples could still be taken even with snow on the ground. The snow could be shoveled away from the spring and a sample taken, but I believe damage could be done to the spring in trying this, namely; when exposing the spring source to the cold temperatures it may freeze, causing the source to seek a new outlet. The normal snow cover acts as an insulator preventing the frost from penetrating into the source very far. This could be a serious mistake, and one that we could not accept the responsibility for.

- B. The Forest Service frowns on unnecessary traffic on Forest Roads in muddy conditions because vehicular traffic damages the roadway, making deep ruts which greatly add to erosion problems.
- C. The safety of Plateau personnel during bad weather and road conditions is also a major factor which we are very concerned with. Muddy and/or slick roads greatly add to the danger of vehicular and foot travel.

During the winter months when snow is on the ground, safety procedures dictate that snow mobile or snow cat travel be done by two vehicles in the event

that one breaks down.

These are some of our concerns about monthly monitoring. We hope to receive your full consideration of this problem.

NOV #9 - We will submit Quarterly Reports on the result of Hydro-
Tologic Monitoring. We are experiencing some delay in getting the
water analysis results back from the laboratory. This delay seems
to be about thirty days, and could cause some of the analysis to
be delayed in our Quarterly Reports.

At this time, we have not received the results of any analysis.

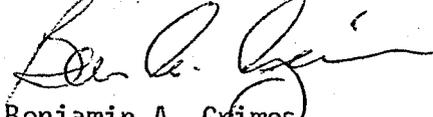
We appreciate the extension of the time for abatement to October 15,
1980, that you granted us verbally this date.

When?
NOV #10 - We are currently formulating plans for Mining and Reclama-
tion of the Mudwater Fan Pad area and will submit them as an addendum
to our Mine Permit Application.

We want you to be aware that construction of this Pad was given
approval by the USGS on June 2, 1977, (see Exhibit B). This was
before the Surface Mining Control and Reclamation Act of 1977.
This may or may not have a bearing on this violation, but we wanted
to document that we had approval to construct this Pad.

Sincerely,

PLATEAU MINING COMPANY



Benjamin A. Grimes
Reclamation Specialist

BAG/srl

cc: Ron Daniels, DOGM
Don Crane, OSM
Larry Damrau, OSM
Steve Rigby, Plateau

Enclosures:



MINE-WATER DISCHARGE MONITORING PLAN

Mine-water that is discharged from the Star Point Mines will be monitored to determine both quality and quantity.

QUALITY

The quality of the discharge will be determined by sampling each discharge and submitting these samples for analysis based on the following parameters:

- a) pH
- b) Oil
- c) Total Suspended Solids (25 mg/l)*
- d) Total Dissolved Solids (650 mg/l)*
- e) Total Iron (2 mg/l)*

*() Indicates Limitations under forthcoming NPDES Permit Number UT-0023736.

The above analysis, except pH - which will be measured by Plateau personnel at the time of sampling, will be performed by an approved independent laboratory.

QUANTITY

The quantity of water that will be discharged will be determined by the use of a pump curve which is applicable to the pump in use.

The pump currently in use is a M.S.H.A. Permissable Flight 1.6 horsepower submersible. Based on the pump curve and the estimated head of fifty-five (55) feet, water will be discharged at a rate of twenty gallons per minute (20 gpm).

Each period of discharge will be timed and the volume calculated accordingly.

Should it become necessary to change the pump or should the head acting on the pump change, the criteria used for volumetric calculations will be adjusted to suit the new conditions.

REPORTING

The results of the qualitative and quantitative measurements will be reported to EPA, OSM, and DOGM within ninety (90) days of the sampling date. If a sample analysis shows the discharge to be in excess of the NPDES limitations, Plateau will immediately notify EPA and DOGM and take the necessary corrective action(s).

AVAILABILITY OF RECORDS

A log book for recording dates, times and volumes of discharges will be kept at the pump location. This log and the other monitoring data will be made available for inspection by the regulatory authority upon request.

An adequate supply of sample bottles will be maintained at the discharge location.