

0003

PLATEAU MINING COMPANY

A Subsidiary of Getty Mineral Resources Company

P. O. Drawer PMC

Price, Utah 84501

Telephone (801) 637-2875

(File) ACT/007/006
Copy to Wayne
for review &
response.
JIM

NOV 30 1981

November 13, 1981

Mr. James Smith
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, UTAH 84116

RE: REPLY TO SEELEY CANYON BREAKOUT STIPULATIONS

Dear James,

Enclosed are the formal answers and replies to the stipulations set forth by your office.

Please review P.M.C.'s reply and if your agency has any additional concerns, please feel free to contact me.

Sincerely,

PLATEAU MINING COMPANY



Mel Coonrod
Environmental Coordinator

MC/jhs

Enclosure

2. UMC 783.19

The applicant will have the Soil Conservation Service [SCS] describe the range site[s] at the breakout area and provide a statement of productivity [SCS letter required] for each range site described. The range site in which the breakout occurs will then be used as the standard for revegetation success. Data previously collected may be used in describing the range site[s]. Range site descriptions, including the data used to make the descriptions [if data previously submitted to the Division is used, a statement to that effect is sufficient], will be supplied to the Division.

The area, in acres, of disturbance in each range [vegetation] type needs to be supplied also.

The above mentioned letter from SCS is attached [Attachment #2]. In addition P.M.C. has supplied the additional reference data as compiled by Endangered Plant Studies, Inc. [Supplement #2, Chapter 6].

In reference to the acres of disturbance, please see the attached plan of breakout. Note the entire area constitutes less than one [1] acre. The exact location and vegetation type cannot be determined until the actual breakout occurs; at which time definitive measurement of vegetation type or types will be made.

3. UMC 784.13

A detailed reclamation plan as required by UMC 783.13 that is in accordance with the performance standards [UMC 817.111-.116] must be submitted.

After the breakout has occurred and a definite determination made as to the exact surface location, type of vegetation, and degree of disturbance, a detailed reclamation plan will be submitted to D.O.G.M. for their review and approval. However, in view of the time period [20 years], any plan P.M.C. writes today, as far as specific methods and procedures are concerned, will most likely be obsolete by the time of implementation. It is P.M.C.'s contention that the commitment made in the MRP to establish vegetation back to a minimum of 80% of what existed should be adequate.

4. UMC 817.97 Wildlife Resource Information

If the breakout in Seeley Canyon occurs as previously predicted in January or February, impacts should be minimal. However, if the breakout occurs after that time and if it should occur in an area that has not been previously surveyed for wildlife, a survey must be done prior to breakout to determine whether the area is utilized as a nesting area for any raptorial species or as a fawning or calving ground by deer or elk. If there will be impacts

on the previously mentioned species, mitigation measures will have to be worked out with the Division before breakout begins. There is a Golden Eagle nest approximately 1-1/4 miles North of the currently proposed breakout area. The actual breakout area cannot be within one kilometer of the nest site.

P.M.C. is committed not to breakout during a time frame which would cause any adverse effects on high priority wildlife and has agreed to notify Larry Dalton of U.D.W.R. prior to the breakout so that his personnel can make on-the-ground determinations of any potential problems.

The subsequent change indicated does not place the breakout outside of the total area in which P.M.C. has conducted both raptorial and high priority wildlife studies. D.O.G.M. has these studies available in the MRP [Supplement #2, Chapter 4].

In reference to the Golden Eagle nest, the changed location of the breakout is further away than originally proposed and is well beyond the one [1] kilometer buffer zone.

Attachment #1 - Letter from U.D.W.R. - confirms the above.

5. UMC 817.21 Topsoil: General Requirements

If the soil types in the proposed breakout area are similar to those in the previously approved breakout area then the applicant may reference the physical and chemical data already obtained to determine the capability of soils for supporting vegetation.

As previously stated, the breakout is still within previously approved breakout area and subsequent study areas. However, please note MRP - Supplement #2 - Chapter 5 which is a revised soils report and does incorporate some new data in reference to Seeley Canyon.

6. UMC 817.24 Topsoil: Redistribution

A plan for the redistribution and revegetation of the disturbed area must be provided to assure interim and final reclamation. The plan should include any soil preparation techniques to be utilized.

Do to the method incorporated in the actual breakout [from underground], what little soil could be salvaged in a more conventional method of disturbance [surface access] will most likely be lost. Subsequently, there will be no stockpiling of top soil on site. The procedure necessary for final reclamation will necessitate [1] transporting top soil [which in physical and chemical nature is compatible with that which was present prior to disturbance], from an alternative site through the mine; [2] placing this soil, from within, to approximately the original depth and

contour of the soil prior to disturbance; and [3] to revegetate the area with the most suitable method available at that time to insure 80% of the original cover.

7. UMC 783.12[6]

The applicant must demonstrate that there are no cultural or historical sites within the area of the proposed breakout. If the existing archaeological clearance indicates that this area has been assessed, then this section of the Mining and Reclamation Plan should be referenced. If the extent of the surveys are incomplete, then an on-site survey may be required to ascertain the required clearance.

P.M.C. has inventoried and had surveyed the area of the proposed breakout and it was determined there are no cultural or historical sites within the area. Reference MRP Volume II, Chapter 5, Plate 5-3, Section 5.2., Page 5 - 8. Note: no sites were recorded in the referenced Plate, Page 5 - 10 and Table 5-2, Page 5 - 11.

ATTACHMENT #1



United States Department of the Interior **RECEIVED** GL-031286

GEOLOGICAL SURVEY

OCT 29 1981

Office of the District Mining Supervisor
Conservation Division
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

PMC
FLOYD J. TUCKER

October 27, 1981

Mr. James W. Smith
Utah State Division Oil,
Gas, & Mining
1588 West North Temple
Salt Lake City, Utah 84116

Dear Mr. Smith:

By letter of September 25, 1981, you informed Plateau Mining Company that approval for breakouts in Seeley Canyon, as proposed, would be granted subject to certain conditions including approval by the USGS.

The Division of Oil, Gas, and Mining has previously approved, with USGS concurrence, the extension of the underground mine workings in the Wattis seam in the Starpoint No. 2 mine. The proposed breakouts are consistent with the mine development plan and are needed to augment the existing ventilation system. We therefore concur with and recommend approval of the Seeley Canyon breakouts in the Wattis seam as proposed by Plateau Mining Company.

Sincerely yours,

Jackson W. Moffitt
Jackson W. Moffitt
District Mining Supervisor

cc: Plateau Mining Company
Denver

PLATEAU MINING CO.
Engineering Dept.

OCT 29 1981

RECEIVED

JFR



DIVISION OF WILDLIFE RESOURCES
DOUGLAS F. DAY
Director

EQUAL OPPORTUNITY EMPLOYER

1596 West North Temple/Salt Lake City, Utah 84116/801-533-9333

October 30, 1981

Reply To SOUTHEASTERN REGIONAL OFFICE --
455 West Railroad Avenue, Box 840, Price, Utah 84501
(801) 637-3310

Mr. Floyd Tucker, General Manager
Plateau Mine
P.O. Drawer PMC
Price, Utah 84501

Attention: Mel Coonrod

Dear Floyd:

As per Mel Coonrod's and Larry Dalton's telephone discussion on October 23, 1981 the Division is of the opinion that the modification to the Seeley Canyon breakout is not a significant deviation from original plans. Thus, impacts to wildlife are expected to be negligible. The proximity of this breakout to high-priority habitats or use areas of high interest wildlife is such that no significant impacts are expected.

Floyd, Division biologists have never been on site at the time a breakout was made. If practicable it is recommended that Larry and Mel be on the surface in the breakout area when this activity occurs. Our professional judgment is that impacts will be negligible, but an onsite evaluation would make everyone involved acutely aware of just what impact in the form of audio disturbance is realized.

Thank you for the Company's interest in resource management.

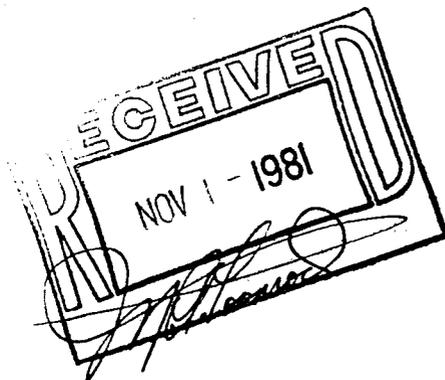
Sincerely,

John Livesay, Supervisor
Southeastern Region

JL:LBD:gp

cc: Darrell Nish

Attachment



ATTACHMENT #2

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
80 West Main St., Room 13
Price, Utah 84501

October 29, 1981



Floyd J. Tucker
Vice President/General Manager
Plateau Mining Company
P.O. Drawer PMC
Price, Utah 84501

Dear Mr. Tucker:

Productivity of the sagebrush grass site located south and east of the main gate and office. This site is the S.C.S. Range Site Upland Loam and this year the production was 900 lbs./acre. The reference area for this site located North is less than the area to be disturbed. The production is 800 lbs./acre.

On the steep slope just west of the sagegrass site; the part to be disturbed is a shrub-grass site producing about 700-800 lbs./acre Mountain Stony Loam (Browse).

The Seeley Canyon break-out range sites consist of:

Gentry Ridge Break-Out

1. Sagebrush - Rabbitbrush - Grass
High Mountain Loam (Summer prec.)
2. Grass
High Mountain Loam (Summer prec.)
3. Sagebrush - Grass
Mountain Shallow Loam (Salina Wildrye)

Seeley Canyon Break-Out

1. Sagebrush - Grass
Mountain Shallow Loam (Salina Wildrye)¹
2. Aspen - Fir
High Mountain Loam (Douglas Fir)¹

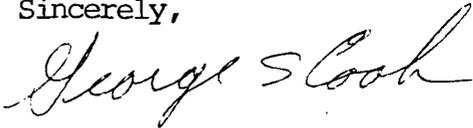
Floyd J. Tucker
Plateau Mining Company
October 29, 1981
Page Two

Seeley Canyon Break-Out - Cont'd.

3. Aspen
High Mountain Loam (Aspen)¹

- 1) These sites are new ecological sites. The data has been gathered and they will be described in the Winter of 1981. They will be available then.

Sincerely,



George S. Cook
Range Conservationist
Soil Conservation Service

GSC/kjh

Enclosures