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NATURAL RESOURCES

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DEPARTMENT OF NATURAL RESOURCES

DIVISION OF OIL, GAS, AND MINING

CLEON B. FEIGHT
Director

1588 West North Temple
Salt Lake City, Utah 84116
(801) 533-5771

JOHN L. BELL
C. RAY JUVELIN
THADIS W. BOX
MAXILIAN A. FARBMAN
EDWARD T. BECK
E. STEELE McINTYRE

June 12, 1981

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

RE: Apparent Completeness
Review
Starpoint Mines
ACT/007/006
Carbon County, Utah

Dear Mr. Tucker:

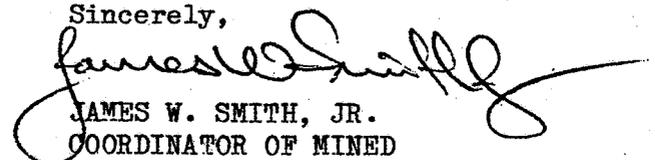
Enclosed please find a listing of the apparent deficiencies that the Utah Division of Oil, Gas and Mining (UDOGM) has identified in the plans submitted. These comments are in addition to those identified in the Apparent Completeness Review (ACR) as drafted by the Office of Surface Mining (OSM).

Since Plateau Mining Company has already addressed a major share of the deficiencies as outlined in OSM's ACR, the comments from the Division are presented separately in lieu of the usual joint compilation procedures. The application is incomplete and the information requested is necessary before the technical review can be completed.

The Division concurs with those other deficiencies as outlined in the OSM completeness review.

Please feel free to call the Division on any matters concerning this review.

Sincerely,


JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

cc: Don Crane, OSM
Steve Rigby, Plateau Mining Company

Enclosures

JWS/DWH/btm

APPARENT COMPLETENESS REVIEW

PLATEAU MINING COMPANY

Starpoint Mines

ACT/007/006

UMC 783.14-.15

The table of contents in Volume III, Section 7.1.3.2.2 lists a discussion of piezometric surface, aquifer recharge and ground water movement. This section is not readily identified in the plan and, therefore, it is not possible to delineate the gradient of ground water flow. The applicant also states that the suspected areas of recharge for springs in the area are the nearby flats along ridges, which implies that springs are locally recharged.

The applicant must submit appropriate map(s) and/or cross sections based upon available data showing the geohydrologic relationships (ground water, i.e., gradients and direction of flow) between the stratigraphy of overburden and interburden and spring locations, with adequate discussion to enable the Division to ascertain the short-term and long-term effect of mining on depth of water and spring flow.

UMC 783.15-.16

Surface and ground water baseline data as presented in the MRP is not adequate to identify in detail the seasonal variations in water quality and quantity within the mine permit area.

The applicant must have a minimum of one complete year's worth of baseline information from an "average" water year for the mine permit area.

The applicant shall make a commitment to provide an annual summary of the water monitoring results and to present the information as outlined in the enclosed "Guidelines for Establishment of Surface and Ground Water Monitoring Programs."

UMC 783.19

The Division concurs with the comments made for this section which direct the applicant to collect data in a certain manner. Since no sampling has occurred as yet, the guidelines will be helpful to and have been adopted for use by the applicant.

The Division understands that OSM has met with the applicant's consultant. UDOGM would like to ensure that the applicant is made aware of an option not to have to maintain a reference area if density, cover and production data are collected in accordance with the UMC 817.116-.117 performance standards in a "normal" climatological year.

UMC 784.13

Stocking rates for shrublands and noncommercial forests must be based on the densities measured in the 1981 sampling season (page 3-118).

If fish and wildlife is to be a primary or secondary postmining land-use, then the requirements of UMC 817.97(d)(9) must be met also.

What is the postmining plan for the Lion Deck portal road (page 3-104)? This plan should conform with the commitments to reclamation made at the Board Hearing on the road of June and July, 1979.

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance

The mining sequence plans indicate operations will extend beneath the southwest portion of the permit area. The ground water monitoring plan does not include sample points within this area. The monitoring points as indicated on plate 7-6 seem to be concentrated in a central east-west band through the permit area. What is the reasoning for sampling these particular springs? The prevalent north-south faulting and associated springs in this area would justify additional ground water monitoring of springs with significant quantities of flow to determine further potential subsidence impacts on surface and subsurface flow.

The applicant states that water from two gushers located in SW 1/4 of Section 7 would undoubtedly have eventually entered Miller Creek drainage, not the Huntington Canyon drainage. Applicant should explain the significance of this statement and why it should be less important to interrupt ground water flow to Miller Creek. Also, what impact will continued interception of ground water have on Miller Creek base flow or on any potential usage downstream outside the permit area.

As mining proceeds into the western portion of the mine plan area, a small amount of water that eventually would flow into the Tie Fork drainage and into Huntington Creek may be intercepted by the mine. Applicant should clarify and quantify this statement. What is a small amount? Where does the applicant feel it is most likely to intercept this water (i.e., near faults, or elsewhere)?

The potential impacts on the base flow and downstream water use of these streams should be estimated.

UMC 817.97

Since the applicant appears to prefer addressing these performance standards by written form in the MRP, the following comments are offered: (A) how and which water sources will be protected? How will alternate sources be protected (page 3-93)?; (B) a commitment to the reporting requirements for threatened and endangered species and golden eagles has not been mentioned; (C) a commitment to ensure that all electric power lines are raptor-proof has not been mentioned.

(d)(2) The applicant may want to address in the MRP the planned enhancement work concerning deer movement and the conveyor at the site.

The Utah Division of Wildlife Resources (UDWR) comments on the MRP have been submitted, reviewed and incorporated into these comments as per the MOU between UDOGM and UDWR.