

**PLATEAU MINING COMPANY**

A Subsidiary of Getty Mineral Resources Company

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May 6, 1982

Mr. Wayne Hedberg  
Reclamation Hydrologist  
Division of Oil, Gas and Mining  
4241 State Office Building  
Salt Lake City, Utah 84114

RE: MEETING OF PLATEAU MINING COMPANY, DIVISION OF OIL, GAS AND MINING,  
AND OFFICE OF SURFACE MINING CONCERNING MRP SPECIAL STIPULATION #7.

Dear Wayne:

Plateau Mining Company appreciated the opportunity to meet with representatives of the DOGM and OSM at the mine on April 30, 1982 to discuss resolution of Special Stipulation #7. Plateau thanks you for the time and consideration you and the other representatives of DOGM and OSM have given to this matter.

By way of this letter, Plateau would like to summarize the status of efforts to comply with Stipulation #7 and make recommendations for your consideration for resolving it in a manner most agreeable to all parties concerned.

Stipulation #7 initially involved the stability of Impoundments 1, 3, 5 and 8. However, Impoundment 8 has been deemed by Plateau as not necessary for the Sediment Control Plan, since the proposed disturbed area which would have been served by it will not be disturbed under the current mine and reclamation plan. Plateau seeks to have both the DOGM and OSM concur that installation of Impoundment 8 is not necessary to resolve Stipulation #7. Please refer to Plateau's Reply to Special Stipulations, dated February 17, 1982 for more detail.

Impoundments 1, 3 and 5 have been constructed and are currently serving active mine areas. The referenced stipulation reply submittal included a geotechnical embankment stability analysis of those impoundments conducted by R. & M. Consultants, Inc. The report concludes that the

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embankments do not meet the slope requirements or safety factors specified in the stipulation. However, in a letter dated November 18, 1981, R. & M. Consultants, Inc. stated that the embankments are in fact stable as constructed, and recommended that a variance from the stipulation be granted. Plateau still urges, as it did in the referenced reply submittal, that a variance be granted. However, Plateau desires to cooperate in every way possible to achieve the best possible resolution of the stipulation for all parties concerned. Several other alternatives were therefore urged and discussed by Plateau as well as the DOGM and OSM at the April 30th meeting. A field tour was also conducted to inspect and gain a perspective on the particular aspects of each impoundment.

During the inspection of Impoundment 1, OSM representative Ken Lawver observed that the disturbed area tributary to it should qualify for a small acre exemption under Rule 817, 42(a)(3). The possibility of lessening the slope of the back face was dismissed due to the proximity of critical deer habitat downstream from the embankment.

During the inspection of Impoundment 5, Plateau representative Mel Coonrod indicated the path of a diversion which would redirect the drainage now tributary to it. The redirected drainage would pass through a catch basin and flow on to Sedimentation Pond 6. It was also shown that the amount of fill used in constructing Impoundment 5 was minimal. The average computed safety factor is very close to the 1.5 level called for by the stipulation. The diversion of drainage from some 50 acres of tributary disturbance should reduce the required capacity of Impoundment 5 so that a safety factor of at least 1.5 is achieved. Ken Lawver also observed that a recomputation of the safety factor considering only the relatively shallow layer of fill on the natural slope, instead of including the entire natural slope with the fill in the calculation, may result a safety factor of at least 1.5 and would probably be permissible.

Upon inspection of Impoundment 3, it was indicated that it may also qualify for a small acre exemption since it services only 3.3 acres of disturbed area. It was also noted that activities at the Star Point No. 1 Mine would be completed and reclamation of surface areas would begin within the relatively near future. The schedule of reclamation would allow Impoundment 3 to fill with accumulated sediment and progress through natural succession concurrently with reclamation.

As a result of the inspection of the impoundment facilities and the meeting, various alternatives in addition to those discussed above,

were proposed by the parties to comply with Stipulation #7. OSM personnel suggested that recomputations be made of the stabilities using more realistic assumptions for the coefficient of friction for soil adhesion. Plateau personnel suggested that the regulatory authorities determine that Impoundments 1, 3 and 5 qualify as "treatment facilities" under Rule 817.42, and that therefore the requirements of Rule 817.46 do not apply to them. The requirements that would then apply to Impoundments 1, 3 and 5 would be those set forth in Rule 817.42 and in the NPDES permit, including (1) design, construction, and maintenance sufficient to contain and treat runoff resulting from a 10-year, 24-hour event; (2) discharge water quality meeting the most stringent effluent limitations of Rule 817.42 or the NPDES permit; and (3) full reclamation of impoundments and tributary areas upon completion of operations. Plateau believes that it has adequately documented in the MRP and supplements that these requirements have been met for all three impoundments. Plateau also believes that this would be the best approach to take in resolving Stipulation #7 in light of all of the environmental, wildlife, and related concerns.

In summary, the following alternatives, in decreasing order of desirability as viewed by Plateau, are suggested for each impoundment:

IMPOUNDMENT 1: # (1)

1. Determine that it qualifies as a "treatment facility".
2. Exempt it from the design criteria under the small acre exemption;
3. Recalculate the static safety factor.

IMPOUNDMENT 2: # (3)

1. Determine that it qualifies as a "treatment facility".
2. Exempt it from the design criteria under the small acre exemption;
3. Extend the stipulation with regard to it until the commencement of reclamation;
4. Recalculate the static safety factor.

IMPOUNDMENT 3: # (5)

1. Determine that it qualifies as a "treatment facility".
2. Redirect drainage through a catch basin to Sedimentation Pond 6

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*to reduce the required capacity and recalculate the resulting static safety factor;*

3. *Recalculate the static safety factor for only the shallow layer of fill on the natural slope;*
4. *Recalculate the static safety factor.*

*Again, Plateau extends its gratitude to the DOGM and OSM for their participation and consideration in this matter. Please contact Floyd Tucker or Mel Coonrod with any questions concerning the topics covered in this letter.*

*Sincerely,*

*G. P. Saunders*

G.P. Saunders  
Staff Hydrologist

GPS/Rm - Telecopy

cc: Steve Rigby