



0023

STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

June 9, 1982

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

RE: Special Stipulation Responses
to MRP Approval
Star Point Mines
ACT/007/006
Carbon/Emery Counties, Utah

Dear Mr. Tucker:

The Division has completed its review of Plateau Mining Company's (PMC) response to the special stipulations attached to the joint DOGM/OSM conditional permit approval issued January 21, 1982.

There are a number of technical deficiencies still evident from the review of PMC's response which will require clarification. Each item is referenced below:

Special Stipulations

- #3. Item 2 of this stipulation requires PMC to supply OSM with a copy of the cultural resource inventory report, which is to be based upon the initial inventory generated from Item 1, of this stipulation. Plateau Mining Company states that they have completed the surveys and will be forwarding a report for review. Neither DOGM or OSM have received a copy of this report to date. This report must be reviewed and a determination made that all lands in question have been surveyed adequately prior to stipulation clearance by the regulatory agencies.

- #4. This stipulation has been partially fulfilled. The possibility exists that the cultural resource report requested in Stipulation #3 may provide the necessary information to finalize 106 compliance with the Utah SHPO. Site specific justification for why a site is or is not eligible must be provided in order to satisfy this stipulation.
- #6. PMC has not provided information relative to any soil depth variations necessary to address the various site-specific reclamation needs at the minesite. Rather, the company guarantees that a minimum of ten (10) inches of soil will be available for reclamation. In addition, PMC cites a need to develop a data base which will yield information more directly applicable to the site-specific conditions to be encountered.

The company is currently working with the Division in an effort to develop test plots which will generate soil depth and fertility amendment information which will be directly applicable to the reclamation of the refuse disposal area. This information may be beneficial in light of ultimate reclamation of other areas of the minesite as well.

Pursuant to this stipulation, PMC should identify any specific data needs which will be satisfied by the proposed test plot approach. Further, any additional data needs not addressed by the test plots should be identified. In line with this, a compliance schedule addressing the time frames in which data acquisition efforts will begin, and when data will be available, must be provided to the Division by September 30, 1982.

- #7. Several meetings and discussions have occurred between PMC, OSM and DOGM in regard to this stipulation concerning sedimentation pond embankments stability and design criteria. The following final recommendations are a result of these meetings and should resolve the compliance concerns:
 - (a) Pond #1--the disturbed area which this pond serves is small (5.1 acres). An exemption from design criteria under UMC 817.42(a)(3) is considered applicable to this structure. The present structure would remain in place and be maintained as an alternative treatment facility.
 - (b) Pond #3--PMC should re-evaluate the cohesive factor values used in determining the static safety factor for this pond embankment. If this reassessment does not solve the problem, PMC could submit their reclamation schedule for this area and request relief based (as was indicated at the April 30, 1982, meeting) upon plans to begin reclamation this fall.

Another possible solution which may qualify this pond for an exemption under UMC 817.42(a)(3), would be to bypass or provide alternative means to handle the 48 acres of undisturbed drainage currently diverted into this structure.

- (c) Pond #5--this structure appears to have been constructed primarily by excavation into the existing natural ground surface. The northern end of the dam embankment appears to have an approximate four (4) foot thickness of fill material and is very wide at this point. The engineering data concerning the computation of the static safety factors, (specifically, the cohesive factor and depth of embankment fill) should be re-evaluated for this structure as visual inspection would tend to indicate a relatively stable condition.

PMC indicated an alternative of using pond #5 as a preliminary catch basin and then passing the water on to pond #6. This should be satisfactory provided pond #6 meets the volume requirements to handle the additional flow.

The undisturbed drainage diversion associated with the planned refuse pile expansion must be constructed prior to any rerouting of waters through pond #6 on a permanent basis.

Note: The use of pond #6 may be implemented on a temporary basis, if necessary, to repair the problem with the discharge valve and weld separation in the decant pipe of pond #5.

- #10. (a) The seed mixtures for permanent revegetation have not been submitted and approved by the regulatory authority to date. Seed mixtures were provided in the Mining and Reclamation Plan as possible seed mixtures with no commitment as to their use. In addition, no seed mixture for topsoil stockpile stabilization is identified. The requirements of this stipulation have not been met.
- (b) Additional information is necessary concerning the comprehensive plan addressing the density, composition, and location of woody plants and tree groupings to be reestablished on the disturbed areas.

The deadline for submittal of the vegetation items (#10) is still within 60 days of planting or by January 21, 1983 (whichever comes first).

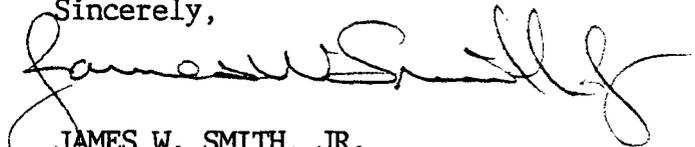
The deadline for response and/or implementation of all other stipulations is September 30, 1982.

Mr. Floyd J. Tucker
ACT/007/006
June 9, 1982
Page 4

Attached are copies of the comments from the Mineral Management Service and the U. S. Forest Service. The Forest Service indicates they must approve any seed mixture for use on National Forest land.

Should any questions arise pertaining to these requirements, please contact us at your earliest convenience.

Sincerely,



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

cc: Allen Klein, OSM
Bob Morgan, Dam Safety
Dennis Dalley, State Health
Sally Kefer, DOGM
Joe Helfrich, I & E

JWS/DWH:btb



United States Department of the Interior

OFFICE OF THE SECRETARY

U-13097
SL-031286
U-7949
U-37045

Minerals Management Service
Office of the District Mining Supervisor
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

April 1, 1982

Memorandum

To: Regional Director, Office of Surface
Mining, Denver, Colorado

From: District Mining Supervisor, Minerals Management
Service, Salt Lake City, Utah

Subject: Plateau Mining Company, Star Point Mines, Carbon
County, Utah, Underground Mining and Reclamation Plan



The one-volume supplement to the subject plan which was transmitted to this office with your form letter dated March 23, 1982, has been reviewed as requested for completeness and technical adequacy relating to the responsibilities of the Minerals Management Service. We have determined that this volume, which is the reply to the special stipulations of the approved subject plan dated January 21, 1982, is compatible with the requirements of the 30 CFR 211 regulations and for our administration of the associated Federal coal leases. Maximum economic recovery, as determined in the seven-volume approved plan, will not be affected by enforcement of these special stipulations.

J. Gordon Whitney
For Jackson W. Moffitt

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
Manti-LaSal National Forest
599 West Price River Drive
Price, Utah 84501

2820

April 28, 1982

Mr. Robert Bamburg
OSM - Reclamation and Enforcement
Brooks Towers - 1020 15th Street
Denver, Colorado 80202



Dear Mr. Bamburg,

The Forest Service has reviewed Plateau Mining Company's (PMC) response to the special stipulations for the Star Point Mines. Their responses are satisfactory. It should be mentioned that there is a Collection Agreement between the Forest Service and PMC for subsidence and hydrologic monitoring. All Federal lands within coal leases U-13097, SL-031286, U-7949, and U-37045 are included in the monitoring program. If additional lands are added by a lease action, the new land must be incorporated into the monitoring program. Those stipulations agreed to in the Collection Agreement will become automatically valid for lands added by leasing.

Any proposed seed mixes for reclamation, or use of National Forest land must receive Forest Service concurrence.

We appreciate the opportunity to review and respond to the special stipulation replies by PMC. If there are any questions, please contact us.

Sincerely,

W H Baly
for
REED C. CHRISTENSEN
Forest Supervisor