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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dr. G. A. (Jim) Shirazi, Division Director

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

August 16, 1983

Mr. Floyd T. Tucker
General Manager
Plateau Mining Company
P. O. Drawer PMC
Price, Utah 84501

Attention: Mr. Ben Grimes

RE: Approval of Plateau Mining
Company's (PMC) Response to
Mining and Reclamation Plan--
Special Stipulations & Refuse
Pile Expansion Stipulations
Star Point Mines
ACT/007/006, Folder Nos. 2 & 4
Carbon County, Utah

Dear Mr. Tucker:

The Division has completed reviewing Plateau Mining Company's reply to the Mining and Reclamation Plan (MRP): (1) Special Stipulations; and (2) Refuse Pile Expansion Stipulations. The Special Stipulations were conditions attached to the final permit approval for the Star Point Mines. The majority of these stipulations have been adequately addressed, however, the following areas still remain unresolved:

Special Stipulation #6 and Refuse Pile Stipulation 9-22-3

The crux of the concerns brought out in Special Stipulation #6 and Stipulation 9-22-3 was the necessary depth of topsoil redistribution and how this might vary due to site specific conditions.

Operator Response: The operator promises to provide sufficient material to affect reclamation, stating that 10 inches will be available. The operator also identifies the need for further study. Pursuant to this, an extensive test plot program was designed (see June 2, 1982 Division of Oil, Gas and Mining [DOG M] letter) to test various depths of topsoil and subsoil replacement as well as various fertility amendments.

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Problems Identification

The operator did not utilize all of the conditions cited in the above letter and failed to provide the DOGM with an account of what was implemented in the field.

A recent problem has manifested itself. This is due to the location of the proposed overland conveyor (Unit Train/Loadout Facility). The company has indicated the facility has been designed in such a way that it will encroach on the test plot site and that the test plots may be sacrificed. PMC does not acknowledge the relationship between permit approval conditions and the test plot program.

Remedies:

1. The Division requires a full account of exactly what was done in the field when the test plots were implemented.
2. PMC must provide data for 1983 on germination and commit to supplying 1984 establishment and survival data.
3. PMC must provide justification concerning test plot disruption should PMC actually move to encroach on the test plot site. A detailed program capable of providing all required data should be submitted at least 90 days prior to encroachment. Approval of any plan involving encroachment will be linked to this substitute program.

Special Stipulation #7

Pond #1 - The operator's proposal for this structure is adequate to comply with this stipulation.

Pond #3 - The operator proposes to reclaim pond #3 in the spring of 1984 at which time the decant devices will be removed and the structure allowed to "heal" through an augmented pond succession process. Plateau further requests that the pond be considered a treatment facility #2 instead of a sediment pond because the disturbed area it drains is small.

DOGM Response: The proposal for recategorizing sediment pond #3 to treatment facilities #2 will not be acceptable until the operator's monitoring data for discharges from the pond meet the appropriate effluent limitations for discharges from reclaimed areas.

However, the latest presentation and re-examination of the soil factors used in determining the static safety factor is adequate to comply with the requirements of this stipulation.

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Pond #5 - The operator's justification for requesting the designation of this sediment pond to treatment facility #3 is not acceptable at this time.

However, due to the fact that the amount of drainage area to the pond has been reduced by two-thirds with the implementation of the undisturbed diversion ditch, the reevaluation of the static safety factor and that the operator is presently redesigning the discharge structure for the pond, the proposal is adequate to comply with the requirements of this stipulation.

Special Stipulation #10

- A. The proposed seed mix for the "Douglas fir type" is not adequate. Three (3) pounds Pure Live Seed (PLS) of Mountain brome is not sufficient to supply adequate cover (erosion control) while shrubs and trees become established. Several grass and forb species should be included as well
- B. The operator's response is not adequate. What is the target density (goals) for the various tree species and shrubs? Spacial arrangements (i.e., clumping, etc.) need to be discussed in detail.

Stipulation 6-14-82-4-IK

1. As per UMC 771.23(b), "Information . . . shall be . . . presented clearly and concisely, and supported by appropriate . . . technical . . . material," the vegetation report does not meet any standard of clear or concise. Field data sheets do not support the summaries of the various parameters that were measured. Many errors are apparent in even the simplest of mathematical calculations. Figures reported on one page were not necessarily those reported elsewhere for the same parameter (nor could differences be attributed to "rounding of figures").

It is highly recommended that a meeting be set up with the company to go over the report and then, before it will be accepted, the company will need to redo the report to make it clear and concise.

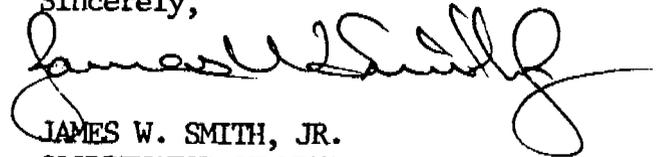
2. As per UMC 771.23(c), the company needs to supply (1) the names of persons or organizations which collected and analyzed the data; and (3) descriptions of methodology used to collect and analyze data.
3. The applicant should also supply a map showing the location of the reference area.
4. Although a species list was supplied, several of the species listed require much better growing conditions than exists at the site. Those not growing on-site should be eliminated from the list.

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5. The Soil Conservation Service (SCS) letter reports productivity for north and south facing slopes--this does not correlate with the data for cover and density that is reported for east and west facing slopes.
6. Concluding Comment: As presented, this report is not acceptable in meeting the requirements of Stipulation 6-14-82-4-IK, the information required is probably in the report (but as presented, is well disguised). It needs to be presented in a clear and concise manner.

The operator must provide an adequate response to the remaining deficiencies by September 16, 1983. Should you have any questions or comments, please contact Mr. D. Wayne Hedberg of my staff.

Sincerely,



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

JWS/DWH:btb

cc: Shirley Lindsay, OSM, Denver
Jodie Merriman, OSM, Albuquerque
Reed Christensen, U. S. Forest Service
D. Lof, DOGM
T. Portle, DOGM
L. Kunzler, DOGM
D. Wayne Hedberg, DOGM