

PLATEAU MINING COMPANY

A Subsidiary of Cyprus Coal Company
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Telephone (801) 637-2875

file Starpoint Mine
ACT/007/006
#13
RECEIVED
JUN 04 1986

DIVISION OF
OIL, GAS & MINING

June 2, 1986

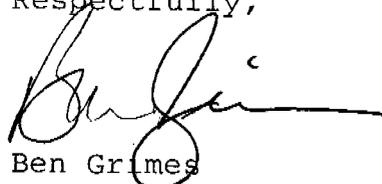
Ms. Kathy Mutz
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Summary of Meeting Held May 7, 1986

Dear Ms. Mutz:

Enclosed please find a copy of a memo from Kent Crofts to me summarizing the discussion held with you and Lynn Kunzler on May 7, 1986. If you see anything in the memo that contradicts your understanding of the meeting, please let me know.

Respectfully,



Ben Grimes
Environmental Coordinator

BG:sd

Enclosure

May 23, 1986

TO: Ben Grimes
FROM: Kent Crofts
SUBJECT: Summary of Meetings with Lynn Kunzler and Katy Mutz on May 7, 1986
to Discuss PMC Permit Renewal

VEGETATION SECTION

Mapping

PMC does not have a vegetation map that covers the entire permit area. It was agreed that PMC would prepare a map of the major community types as determined from previous PMC, Forest Service, BLM, U.S. Fuel data. To the extent this coverage is inadequate, then PMC will map the vegetation with emphasis on delineating critical habitat types such as riparian areas. This mapping will be field checked by PMC as soon as access allows. The permit area map will be mapped of a scale of 1" equals 1,000'. All areas previously or planned to be disturbed will be mapped at a scale 1" equals 200', to the extent that baseline information is available.

Sample Locations

The transect locations for the premine and reference area sample sites were either not recorded, or have been misplaced. It was agreed that since UDOGM gave approval prior to all previous sampling, this should not pose a major problem in the repermitting effort. To the extent possible, PMC will delineate the general areas that were sampled.

Submittal of Raw Field Sheets

Since this information has been previously submitted by Plateau for most areas sampled and since PMC has elected to use the reference area approach, it is PMC's understanding that UDOGM does not deem it necessary that this information be submitted in the repermitting package.

Data Presentation

It is PMC's understanding that UDOGM wants all of the vegetation data submitted in a format that allows for the individual data by species in each transect to be compared. UDOGM requested that all data for premine and reference area comparisons, even if these areas have been disturbed, be presented in a standardized format and all previously submitted data be placed in a single section as conditions allow.

Similarity Index

Since some of the previously established reference area and premine area comparisons were submitted and approved by UDOGM without the calculation of a similarity index and since all of these areas have subsequently been disturbed, PMC questioned the value of calculating the similarity index. UDOGM requested that PMC complete this calculation and in the event that an acceptable similarity index value is not obtained, then it is recommended that PMC submit a memo issued at the time the original sampling was conducted approving the site.

Pinyon-Juniper Reference Areas

PMC currently has four PJ reference areas which have been established to satisfy prior permitting concerns.

1. The 1981 PJ reference area established by Welch and Murdock;
2. An east aspect topsoil reference area established in 1982;
3. A west aspect topsoil reference area established in 1982; and
4. The Unit Train Loadout Reference Area established in 1983. PMC believes that these reference areas could be combined or possibly eliminated all together.

Both PMC and UDOGM agreed that the 1981 PJ reference area could be eliminated and that possibly some of the other three areas could be either combined or eliminated as well. In order to address this possibility, UDOGM requested that PMC submit the revised vegetation map as soon as possible and then following UDOGM's examination of this map, a site visit would be arranged to determine whether or not some of the reference areas could be combined or eliminated.

Reclamation Seed Mixtures

UDOGM expressed a concern about different seed mixtures used by PMC to satisfy various USFS, BLM, UDOGM and free land owner concerns. UDOGM requested that the repermitting submittal specifically single out each one of these seed mixtures and specify the area in which they relate. To the extent that prior USGS and BLM lease stipulations pose concerns to UDOGM, then UDOGM will consult with the respective agency in order to develop an acceptable seed mixture to satisfy UDOGM concerns.

Threatened and Endangered Species

Discussions centered on how to treat T&E species on previously disturbed areas. UDOGM recommended that for these previously disturbed areas the information presented in previously submittals simply be summarized in the

new submittal. For areas projected to be disturbed UDOGM recommended that the most recent USFWS species list be consulted to determine whether or not any species are listed for the habitat likely to be disturbed.

Reclamation Monitoring

The following suggestion regarding the frequency and parameters to be measured was given to PMC:

<u>YEAR</u>	<u>PARAMETERS TO BE MEASURED</u>
1	emergence and establishment
2&3	cover and density
5	cover and density
9&10	cover, density and production

PMC agreed to monitor all reclaimed areas using this outline.

ANNUAL RECLAMATION REPORT

Discussions centered on PMC's request to modify several components of the monitoring required to satisfy the 1986 monitoring requirements including the following changes:

1. Discontinuing the monitoring of the shrub office cut plots. These plots have been monitored for five years and show no changes in plant survival or growth.
2. Discontinuing the annual monitoring of the refuse plots not covered with topsoil.
3. Discontinuing the slope segment monitoring on the topsoiled refuse test plots, which have shown no differential response for the past two years; and
4. Discontinuing the annual production sampling on all previously reclaimed sites and the refuse test plots to conform to the monitoring schedule previously outlined under Reclamation Monitoring.

UDOGM reported that conceptually these changes appeared acceptable, but they would need to review the annual reclamation report and possibly visit the site to determine whether or not these modifications could be approved. UDOGM agreed to review the annual reclamation report and visit the site by the end of May.

Mulching

PMC discussed the possibility of modifying the requirement to mulch all reclaimed areas at the PMC mine site. PMC reported that two site specific mulching studies conducted at PMC; one established in 1980 and the other established in 1982 have failed to show a beneficial response to plant establishment from mulching. UDOGM suggested that PMC submit their proposal and supporting data prior to the permit submittal so they could get a preliminary determination from the UDOGM as to whether or not the likelihood existed to modify or possibly eliminate the mulching requirement. PMC will submit this information to UDOGM and this item can also be examined on the site visit to the mine.

Shrub Density

UDOGM reported that unless an acceptable standard with adequate documentation is presented, the requirement is to replace 90% of the premine shrub density. PMC will examine the possibility of developing an acceptable shrub density standard.

Alternate Postmining Land Use for Refuse Piles

Since the possibility of changing the reclamation plan involves so much documentation and would be so time consuming, my recommendation would be for PMC to defer considering changing the postmining land use at this time.



KAC/fc