

April 1, 1986

TO: Lowell P. Braxton, Administrator

FROM: D. Wayne Hedberg, Permit Supervisor *DWH*

RE: OSM Request, Chronology, Certification for Sedimentation Ponds, Star Point Mines, Plateau Mining Corporation, ACT/007/006, Carbon County, Utah

This memo is prepared in response to a series of OSM requests for detailed information regarding the P.E. Certification of the sedimentation ponds at Plateau Mining Corporation's (PMC) Star Point Mines. The OSM letter of October 7, 1985 specifically questioned DOGM's approval for an exemption to UMC 817.46(r) for sedimentation pond #1. The following is a chronology of permitting documentation which pertains to pond #1. Copies of the majority of the referenced documents are enclosed for your review.

1. September 16, 1981 - PMC response to stipulations attached to DOGM's Refuse Waste File Approval dated September 16, 1981, Operator request for variance to UMC 817.46(m).
2. October 2, 1981 - DOGM Recommendation for Approval of MRP, Special Permit Stipulation #7, UMC 817.46(m)(n)(o).
3. January 5, 1982 - DOGM Review of Refuse Waste File Stipulation Response, and request for variance to Special Stipulation #7.
4. January 22, 1982 - DOGM/OSM/PMC joint onsite meeting at Star Point Mines to discuss company request for variance to sedimentation pond stipulation. (OSM attendees - Randall Overton & Jodie Merriman)
5. January 25, 1982 - Division of Wildlife Resources letter regarding potential wildlife impacts if sediment ponds 1, 3 & 5 are relocated.
6. February 17, 1982 - PMC Reply to Special Stipulations to overall permit approval. Contains November/81 R & M Consultants, Inc. Embankment Slope Stability Study for sediment ponds 1, 3 & 5.

Page 2
Memo to Lowell Braxton
April 1, 1986

7. March 9, 1982 - PMC response to address discussions at January 22nd onsite meeting regarding sediment ponds 1, 3 & 5 variance. R & M Consultant report contained suggestions for bringing sediment ponds into compliance.
8. March 23, 1982 - Transmittal letter to OSM, copies of PMC March 9, 1982 submission. Request for expeditious OSM review (ATTN: Bob Bamberg, Randy Overton).
9. April 26, 1982 - OSM response to March 9th submission. Plans found deficient, OSM to send Bob Bamberg and Ken Lawver to meet with DOGM and PMC onsite April 30, 1982.
10. April 30, 1982 - DOGM/OSM/PMC onsite meeting at Star Point Mines to discuss deficiencies with March 9th submission.
11. May 6, 1982 - PMC followup letter to the joint onsite meeting of April 30th. This letter documents the discussion, alternatives and possible technical solutions outlined at the meeting. PMC summarizes the status of their efforts to comply with Stipulation #7 to date and makes recommendations for joint DOGM/OSM consideration in ultimate resolution of this stipulation. This letter outlines PMC's request to have the ponds considered as "treatment facilities".
12. May 14, 1982 - OSM response and followup to April 30th onsite meeting with DOGM and PMC. Recommendations for ultimate compliance are presented for each of the sediment ponds in question (1, 3, 5). Excerpt, "It appears that an exemption could be given under 817.42(a)(3) for Pond #1. The structure should remain in place as an alternate facility."
13. June 2, 1982 - OSM review letter to PMC response to Special Stipulations as outlined in the January 21, 1982 permit approval.
14. June 9, 1982 - DOGM response letter to PMC Response to Special Stipulations. The letter incorporates OSM's June 2nd compliance recommendations for special stipulation #7.
15. August 18, 1982 - PMC reply to (1) Special Stipulations and (2) the Refuse Pile Expansion Stipulations. PMC requests and exemption under UMC 817.42(a)(3) for Pond #1.

Page 3
Memo to Lowell Braxton
April 1, 1986

16. September 7, 1982 - DOGM transmittal letter to DSM enclosing PMC's latest August 18, 1982 response to June 9, 1982 deficiency letter.
17. August 16, 1983 - DOGM approval to PMC's response to MRP Special Stipulations & Refuse Pile Expansion Stipulations. The operator's proposal for Pond #1 is determined acceptable to comply with the stipulation (approval to redesignate the pond as an alternative treatment facility).
18. April 4, 1984 - PMC request for variance from UMC 817.46(r), for Ponds 1, 3, and 5 (i.e., requirement that the ponds be inspected during construction by a P.E.).
19. May 23, 1984 - DOGM response to request for variance to UMC 817.46(r). Division requires existing ponds #1, 3 & 5 to be surveyed by a registered land surveyor to verify appropriate construction according to approved designs.
20. July 13, 1984 - PMC response to DOGM May 23, 1984 request for additional information. Contained registered surveyor's measured survey results for ponds #1, 3, and 5.
21. July 19, 1984 - DOGM response to PMC's July 13th submittal. Variance to UMC 817.46(r) granted for treatment facility #1 (pond #1), not for ponds 3 and 5.
22. October 15, 1984 - PMC abatement response to NOV 84-4-11-1. Request for a variance from part of UMC 817.46(r) for Ponds 3 and 5 (i.e., requirement that ponds be inspected during construction by a P.E.).
23. October 23, 1984 - DOGM response to PMC's October 15, 1984 abatement plan and variance request. Request denied and more information required from operator.
24. November 27, 1984 - DOGM receives copies of consultants reports (Vaughn Hansen Associates, and R & M Consultants Inc.) which address the additional requirements of the Division's October 23, 1984 letter.
25. December 7, 1984 - DOGM issues conditional approval of PMC variance request for Ponds 3 & 5 based upon the operator's November 27th response.

Page 4
Memo to Lowell Braxton
April 1, 1986

26. March 14, 1985 - DOGM receives the additional copies of the plans requested as a condition to the December 7, 1984 approval.

The documentation outlined above, constitutes the "written history of the case", which OSM requested in their October 7, 1985 letter (received 11/12/85).

The following is an itemized response to the additional written clarification requested in the October 7th letter from the OSM Albuquerque Field Office.

- (1) The rule used in redesignating the water impoundment as a alternate treatment facility was UMC 817.42(a)(3). Also refer to the letter from Allen Klein dated May 14, 1982 which supports and concurs with this decision.
- (2) With reference to our letter dated July 19, 1984, the performance standards referred to were UMC 817.42 (discharge effluent limitations) and UMC 817.46 [except for sections (m) and (r)].

The impoundment had no record of discharge to date, it had not contained more than 3 feet of water at any one time during the four years of operation and had been dry for most of its operational life. OSM concurred that the disturbed area was small which drained to the facility.

A copy of the Division's August 16, 1983 approval documentation is attached.

- (3) To the best of my knowledge, there have not been any other redesignations of water impoundments to treatment facilities approved at any other Utah coal mining operation.

With regard to the OSM reference to the certification requirements of UMC 817.49 for all impoundments, the following explanation is given:

Page 5
Memo to Lowell Braxton
April 1, 1986

The Division's approval dated July 19, 1984 for pond #1, which granted a variance to a P.E. certification for this structure, was based upon the series of consulting engineering reports (i.e., R & M Consultants Report, from Larry Migliaccio, P.E., dated November 1981, see PMC response to Special Stipulations, 2/17/82) which present the results of a stability analysis, an engineer's physical examination and recommendations for impoundment #1, and the certified as-built survey results by Mr. Bruce Ware, a registered land surveyor, (see July 13, 1984, PMC response) for impoundment #1.

Summary of Engineering Report (Impoundment #1)

- (a) The impoundment was constructed within a previously disturbed area, close to the active mining operations. The general site location was recommended by an OSM inspector upon a site inspection (DOGM verbal communication w/PMC).
- (b) Engineer reported that impoundment's present condition is structurally sound.
- (c) Engineer's report stated that potential embankment failures would be on shallow critical slope failure surfaces within 6 feet of the surface of embankment fill.
- (d) Before a deep seated failure would occur, the factor of safety would need to exceed 1.5 static and 1.1 or greater in dynamic condition.
- (e) Should a catastrophic event occur, total embankment failure (very remote likelihood) would cause primarily aesthetic downslope impacts. No critical downslope structures exist, the receiving stream is an ephemeral drainage and any impounded water would likely be rapidly absorbed by surface vegetation and permeable soils.

If OSM is of the opinion that our decision was inappropriate, then additional information would be requested of the company similar to that required for sediment ponds #3 and 5 (refer to DOGM letter dated July 19, 1984).

I am available to answer any questions you may have concerning the above, please feel free to contact me at your convenience.

8946R



United States Department of the Interior

OFFICE OF SURFACE MINING
RECLAMATION AND ENFORCEMENT

219 CENTRAL AVENUE, NW
ALBUQUERQUE, NEW MEXICO 87102

OCT 07 1985

*orig mine file
cc K. May
L. Braxton
DRN*

RECEIVED

NOV 12 1985

DIVISION OF OIL,
GAS & MINING

Dr. Dianne Nielson, Director
Division of Oil, Gas & Mining
355 W. North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84108

Dear Dr. Nielson:

On August 20 and 21, 1985, an oversight inspection was conducted at Plateau Mining Company, Starpoint 1 and 2 Mines, permit #ACT-007-006. The inspection was conducted jointly with Barton Kale and Henry Austin representing our respective agencies. (Please refer to OSM Minesite Evaluation Inspection Report dated September 19, 1985.)

During the inspection and on a subsequent follow-up inspection conducted by Mr. Austin on September 11, 1985, it was determined that sedimentation pond #1 had been exempted from obtaining an engineering certification pursuant to UMC 817.46(R). (Please reference your letter to Mr. Walter Mueller, Jr., dated July 19, 1984, concerning engineering certification of sediment ponds 1, 3, and 5.)

In related correspondence, letters directed to you from the Albuquerque Field Office, dated October 12, 1984 and February 13, 1985, both address this same issue. I would direct your attention to the letter of February 13, 1985, page two, which reads "Ron Daniels stated he would question Mr. Hedberg and obtain a written history of the case (P.E. certification of the sedimentation ponds at the Star Point Mines.)" A request was also made in this letter to supply us with the written history of this case, which to date has not been received by this office. The October 12, 1984 letter indicates that all water impoundments, no matter what their designation, fall under UMC 817.49, Permanent and Temporary Impoundments, which requires P.E. certification. This was discussed in the September 20, 1984 meeting referred to in the above referenced letter. At that time, it was this office's impression the Division concurred that certifications were mandated on all water impoundments.

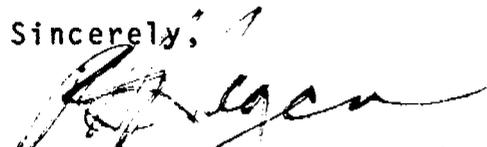
In order for the Albuquerque Field Office to accurately evaluate the Division's actions and policy regarding the redesignation of sediment pond #1 at the Starpoint Mine, written clarification of the redesignation process is necessary.

The written clarification we are requesting should address the following:

- 1) Which statute or final rule of the approved Utah Coal Mining and Reclamation Permanent Program authorizes the designation or redesignation of a water impoundment as a treatment facility?
- 2) In your letter dated July 19, 1984 to Mr. Walter Mueller, Jr. you state, "The structure (sedimentation pond #1) has met and is in compliance with the performance standards for treatment facilities." Please indicate what performance standards are referred to, and how it was determined that sedimentation pond #1 met these performance standards at the time the redesignation to a treatment facility was approved. Your July 19, 1984 letter indicates Division approval was given August 16, 1983. Please provide the Albuquerque Field Office with a copy of the August 16, 1983 approval documentation.
- 3) Has the designation or redesignation of water impoundments to treatment facilities occurred at any other Utah coal mining operations? If so, please provide a listing of their locations, including the name of the mining operation, permit number, and a copy of the documentation approving the treatment facility designation.

If you have any questions concerning this request, please feel free to contact our office.

Sincerely,



Robert H. Hagen, Director
Albuquerque Field Office

SCOTT M. MATHESON
Governor

TEMPLE A. REYNOLDS
Executive Director
NATURAL RESOURCES

CLEON B. FEIGHT
Director



STATE OF UTAH
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS, AND MINING
1588 West North Temple
Salt Lake City, Utah 84116
(801) 533-5771

F107 2-10-81
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October 2, 1981

Mr. Robert Hagen, Acting Director
Office of Surface Mining, Region V
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202

RE: Recommendation for
Approval of MRP
Getty Minerals Resources
Corporation
Plateau Mining Company
ACT/007/006
Carbon & Emery Counties,
Utah

Dear Mr. Hagen:

The Division has completed the Technical Analysis (TA) of the Mining and Reclamation Plan (MRP) for the Starpoint Mines and recommends conditional approval to issue a permit to continue operations under Utah's permanent coal regulatory program.

The permit term will be for a five-year period with permit renewal and/or revision due at that time. Approval of the permit application will not encompass the following proposed areas of future activity due to the inadequate technical information presented in the present permit application:

1. Unit Train Loadout Facility
2. Gentry Hollow Shaft Construction

These two areas will be reviewed at a future date as modifications to the present MRP and any necessary adjustments to the reclamation bond will be made at that time.

Mr. Robert Hagen, Acting Director
ACT/007/006
October 2, 1981
Page two

Plateau Mining Company has requested that the regulatory authority approve certain sections of the MRP, prior to the final approval of the entire application. In response to this request and considering the underlying conditions warranting the review priority of these sections, the Division has reviewed the following areas separately under the permanent performance standards as minor modifications to an existing interim plan.

1. Coal Refuse Waste Pile Extension
2. Seeley Canyon Breakout Location Change

Conditional approval of these particular sections of the permit application has been granted by the Division. Copies of the approval letters with stipulations are attached. Reclamation bonding for these areas is included in the bonding section of the MRP. All other areas as outlined in the MRP for the next five years should be approved and conditioned upon Plateau Mining Company's acceptance of the attached stipulations and submission of the reclamation bond to the regulatory authority.

Attached is a copy of the joint DOGM/OSM Technical Analysis with stipulations and a brief Findings Document for your review and response.

I trust this information will enable OSM to make their final Environmental Assessment (EA) for the decision document to be forwarded to Washington, D. C.

If you have any questions or are in need of additional information, please contact myself or Wayne Hedberg of my staff.

Sincerely,

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

cc: Floyd Tucker, Plateau

JWS/DWH/btm

- 2 -
PERMIT STIPULATIONS

The applicant will submit a brief site specific eligibility recommendation and evaluation of impacts for each of the sites in the mine plan area. The Utah SHPO has offered to help with these statements, if needed. In conjunction with the Utah SHPO, OSM may request that a sample survey for cultural resource areas be conducted for areas potentially affected by subsidence.

UMC 817.21 Topsoil: General Requirements

Data on the SAR and soluble Na must be provided for the refuse disposal area.

Soluble Ca, Mg and Na data should be reported in meq/l rather than ppm.

UMC 817.24 Topsoil: Redistribution

The applicant needs to provide topsoil redistribution methods for each area of disturbance which assure successful revegetation.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds

Provide a description of measures to be taken to bring pond Nos. 1, 3, 5 and 8 into compliance with Section 817.46(m) regarding embankment slopes or variances obtained from regulatory agencies. Any embankment slope not meeting these design requirements must demonstrate and be certified by a qualified registered professional engineer that the embankments are designed and constructed to insure a minimum 1.5 static safety factor. If this is not provided for, then further justification of the embankments stability or designs for reconstruction to meet the design specifications of UMC 817.46 would be necessary. A response to this condition must be submitted within six months of receipt of this approval.

Provide specifications regarding quality of embankment fill material per the requirements of Section 817.46(n) and (o).

UMC 817.52 Hydrologic Balance: Surface and Ground-Water Monitoring

The undetermined extent of possible water resource depletion associated with anticipated mining into the graben/fault zone (to the northwest) will necessitate a commitment from Plateau Mining Company to monitor quantity, duration and location of ground water encountered in the underground mining activities at the Starpoint Mines (with particular emphasis in the region of the graben/fault zone).

Should substantial adverse impacts become imminent, PMC will be held responsible to provide appropriate mitigation measures to those affected individuals according to the plans outlined in the mining and reclamation plan.

All underground development waste will be disposed of in accordance with the coal processing waste. Applicant will comply with this section provided compliance with the requirements of 817.81-.83, 817.90-.93 are implemented.

Effluent Limitations

Any discharge from sediment control facilities will be monitored in accordance with the NPDES permit requirements. The permit contains discharge limitations and monitoring requirements for total suspended solids, total iron, alkalinity-acidity, total dissolved solids, oil and grease and pH. (Permit No. UT-0023736.)

Emergency Spillway

For all seven sedimentation ponds, the emergency spillway elevations are set above the required total storage level. Total storage consists of sediment, dead pool and runoff storage. Elevations for total storage were obtained from Figures 7-11 through 7-17. Emergency spillway elevations were obtained from Plates 7-9 through 7-15.

Sediment Removal

Sediment will be removed when it fills 60 percent of the sediment design volume in the ponds (p. 7-86).

Principal and Emergency Spillway

For the seven ponds, the proposed principal and emergency spillway system will consist of a corrugated metal riser and conduit with an anti-vortex device and trash rack. The emergency spillways are designed to pass the 25-year, 24-hour storm (p. 7-76).

Embankment Elevation

The minimum elevations of pond embankments will be at least 1.0 feet above the water elevation when the emergency spillway is flowing at design depth.

Embankment Construction

For each pond, required total embankment height includes a five percent allowance for settling. The top width of all embankments meets the $(H + 35)/5$ requirement (Table 7-15).

For ponds 2, 4, 6 and 7, the embankment slopes meet the regulation requirements. However, for Ponds 1, 5 and 8, the downstream embankment slopes are 1v:1.35h which is steeper than the 1v:2h limitation. For Pond No. 3, embankment slopes are not given on Plate 7-11, however, it appears that the downstream slope is approximately 1v:1.3h which is steeper than the requirements. Thus, Ponds 1, 3, 5 and 8 do not meet the embankment slope requirements.



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

Wayne

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

January 5, 1982

Mr. Melvin A. Coonrod
Environmental Coordinator
Plateau Mining Company
P.O. Drawer: PMC
Price, Utah 84501-0904

RE: Review of Refuse Waste Pile
Stipulation Response
Starpoint Mines
ACT/007/006
Carbon County, Utah

Dear Mel:

The Division has reviewed Plateau Mining Company's response to stipulations attached to the Refuse Waste Pile Extension approval dated September 16, 1981.

The following issue has developed in light of our review.

Conditioned Variance - Based upon the results of the stability analysis performed on sedimentation ponds (1, 3, and 5) by R & M Consultants, the Division cannot grant approval for the requested variance. The geotechnical studies performed on the embankments did not exhibit the required 1.5 static safety factor except under "dry pool" conditions. Therefore, the Division feels it is necessary to meet on site with representatives of Plateau Mining Company and the Office of Surface Mining to discuss possible alternatives, if applicable, and reach an ultimate solution on this issue.

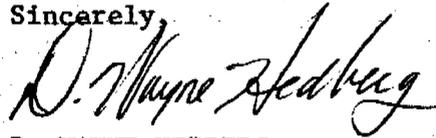
We feel this problem may require prompt attention as it may become an issue in reaching ultimate final approval for the Mining and Reclamation Plan.

A tentative date for this meeting could be scheduled sometime during the week of January 18-22, the following week, or early February. We will contact both your company and the Office of Surface Mining to finalize a date in the immediate future.

Melvin A. Coonrod
Plateau Mining Company
ACT/007/006
January 5, 1982

Additional comments pertinent to this review will be forthcoming, as the review is nearly complete.

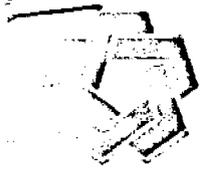
Sincerely,



D. WAYNE HEDBERG
RECLAMATION HYDROLOGIST

cc: cRichard Dawes, OSM (attn: Shirley Lindsay)

DWH/rr



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

January 28, 1982

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

RE: Request for Variance
Sediment Ponds 1, 3 and 5
Star Point Mines
ACT/007/006
Carbon County, Utah

Dear Mr. Tucker:

On January 22, 1982, a meeting was held at your mine office to discuss your company's request for a variance to state and federal criteria requirements for existing sedimentation ponds Nos. 1, 3 and 5.

Representatives from Plateau Mining Company, the Office of Surface Mining, the Division of Oil, Gas and Mining and R&M Consultants, Inc. were in attendance.

The principle topic discussed was the results of a stability analysis which has been performed on the ponds in questions by R&M Consultants for Plateau Mining Company. The Division required that the issuance of a variance would be conditioned upon the ponds exhibiting a 1.5 static safety factor. The results of the study indicated that none of the 3 ponds actually met the requirement for static safety of 1.5. Pond No. 5 appears to be the most stable, while pond No. 1 exhibits the least stable conditions.

The meeting concluded with the following items discussed and agreed upon:

1. The Division of Oil, Gas and Mining/Office of Surface Mining felt that the current extent of information provided by Plateau Mining Company was not adequate to allow either agency justification to grant a variance to the design standards.
2. Neither agency felt, at that time, that a variance could not be granted, provided the company can present explicit supportive documentation to enable the agencies ample justification for issuing a variance to the regulations.

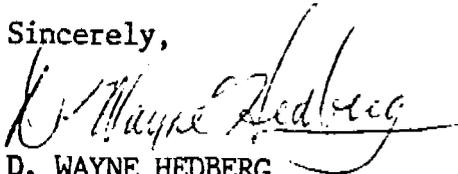
Mr. Floyd J. Tucker
January 28, 1982
Page Two

3. Plateau Mining Company agreed to promptly provide the additional information required which will justify their request for the variance.
4. Upon submission of this information to both agencies, a joint determination will be made and a final decision issued.

Priority should be assigned to this issue as it is a condition to the permit approval package.

If Plateau Mining Company has any additional comments or disagreement with the items listed above, please contact us at your earliest convenience.

Sincerely,



D. WAYNE HEDBERG
RECLAMATION HYDROLOGIST

DWH/te

cc: Richard Dawes, OSM,
Attn: Randall Overton & Jodie Merriman
Larry Migliaccio, R&M Consultants, Inc.
Mary Reynolds
Jim Smith
Sally Kefer

Attendance

(1-22-82)

D. Wayne Hedberg	-	Division Oil Gas & Mining
Mary Bosworth-Reynolds	-	DOG M
Phil Connor		PMC
Steve Rigney		"
Bill Snyder		"
Harry Higbee		R&M Consultants, Inc.
Jodie Merriman		OSM
Floyd L. Tucker		P.M.C.
Dan Price		P.M.C.
Julian Lutz		R&M
Glenn C. Spencer		DOG M
Randall J. Overton		OSM

PLATEAU MINING COMPANY

A Subsidiary of Getty Mineral Resources Company

P.O. Drawer PMC

Price, Utah 84501-0904

Telephone (801) 637-2875

March 9, 1982

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

Re: SEDIMENT PONDS 1, 3 & 5 VARIANCE

Dear Wayne:

Please find attached a report from R. & M. Consultants outlining possible methods to increase the static safety factors of the above mentioned ponds. The report also addresses the probabilities of embankment failure under a variety of conditions.

The report suggests various methods for bringing the ponds into compliance. The only credible option in Plateau Mining Company's opinion, is to relocate the structures in new areas exhibiting the necessary material properties to assure construction would meet the criteria for satisfactory static safety factors.

This determination would be based upon an extensive drilling and testing program with no guarantee that such locations exist in the permit area. Providing access for the drilling and testing would necessitate the destruction of a large number of acres of potentially critical habitat. Also, when you consider that the capacity of the ponds in question is less than two acre feet and that a total failure of any or all would pose no danger to property or safety of P.M.C. employees or the single residence in the area, it seems unreasonable to condemn the structures on an arbitrary static safety factor of 1.5 when in reality the ponds are stable and functioning as designed. It is P.M.C.'s contention that the cost and environmental depredation by such an action is unwarranted.

Based on the attached report, the evaluation by the U.D.W.R. and the revegetation efforts that P.M.C. has already implemented both on and

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MAR 10 1982

DIVISION OF
OIL, GAS & MINING

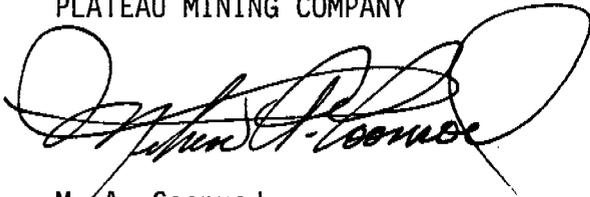
Sediment Ponds 1, 3, & 5 Variance
March 2, 1982
Page 2

adjacent to the ponds in question, it is P.M.C.'s contention that a variance is warranted.

Your concurrence and/or recommendation will be appreciated.

Sincerely,

PLATEAU MINING COMPANY

A handwritten signature in black ink, appearing to read "M. A. Coonrod", written in a cursive style with large loops.

M. A. Coonrod
Environmental Coordinator

Attachment

MAC/1m

state of utah



DIVISION OF WILDLIFE RESOURCES

DOUGLAS F. DAY
Director

EQUAL OPPORTUNITY EMPLOYER

1596 West North Temple/Salt Lake City, Utah 84116/801-533-9333

January 25, 1982

Reply To SOUTHEASTERN REGIONAL OFFICE
455 West Railroad Avenue, Box 840, Price, Utah 84501
(801) 637-3310

RECEIVED

JAN 28 1982

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

PMC
FLOYD J. TUCKER

Attention: Mel Coonrod

Dear Floyd:

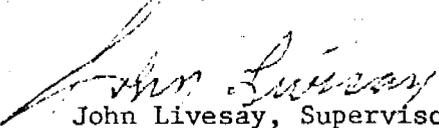
As per Plateau's request the Division has evaluated potential impacts on wildlife that could result from reconstruction of sediment ponds No. 1, 3 and 5 at locations other than where they now exist. The effluent leaving any of these ponds would have to flow in at least 9 miles of dry washes before it would reach Miller Creek which is a perennial stream. Miller Creek supports nongame fishes; segments of the stream are dewatered during the irrigation season through a series of diversions that serve the Miller Creek agricultural area. The return flow from irrigated areas recharges the stream channel.

The Division's concern is that adequate sediment pond capabilities be maintained by Plateau to keep industrial pollutants from reaching Miller Creek. If the now existing ponds are functional this need is considered to be satisfied. Redevelopment of the ponds at nearby locations would represent additional and unnecessary impacts from Plateau's mine or terrestrial habitats.

As you know there are unavoidable impacts on our wildlife resource associated with coal mining. Maintenance and continued use of the existing ponds will result in avoidance of unnecessary impacts on wildlife habitat that would result from construction of new ponds.

Floyd, the Division wants to take this opportunity to express our appreciation for your concern for the State's wildlife resources. Again thanks.

Sincerely,


John Livesay, Supervisor
Southeastern Region

JL:LBD:gp

cc: Darrell Nish



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

March 23, 1982

Ms. Shirley Lindsay
Utah Project Coordinator
Office of Surface Mining
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Attn: Robert Bamberg,
Randall Overton

RE: Copies of Sediment Pond
Variance Request
Plateau Mining Company
Star Point Mines
ACT/007/006
Carbon and Emery Counties, Utah

Dear Shirley:

Enclosed please find two (2) copies of Plateau Mining Company's latest submission of additional information as requested by the Division of Oil, Gas and Mining and the Office of Surface Mining, at our on-site meeting of January 22, 1982, to help substantiate the justification for the variance requested by Plateau Mining Company for sediment pond's 1, 3 and 5.

I spoke with Bob Bamberg of your office this morning and was informed that this information has not been located to date.

I understand that Mr. Overton will be in Denver next week and would appreciate any comment he may have on this issue (time permitting) as he was directly involved with the meeting on January 22nd.

An expeditious review of this proposal would be greatly appreciated, if possible.

Please call me if questions arise.

Sincerely,

D. WAYNE HEDBERG
RECLAMATION HYDROLOGIST

DWH/te
cc: Floyd Tucker, Plateau
Enclosures

File 107-1007-1006
10/19/82
Sally



United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

April 26, 1982

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

RE: UT 0018

Dear Wayne:

We have reviewed the February, 1982 report prepared by R & M Consultants, Inc. concerning sedimentation ponds No. 1, 3, and 5 for the Star Point Mine. This analysis continues to identify stability problems with those ponds and does not identify a satisfactory solution to this problem.

As previously arranged, Bob Bamburg and Ken Lawver from my office will meet with you and company representatives at the mine site on April 30, 1982 to look at the ponds and discuss this problem.

Sincerely,

Richard E. Dawes
Deputy Administrator
Western Technical Center

RECEIVED
MAY 03 1982

DIVISION OF
OIL, GAS & MINING

PLATEAU MINING COMPANY

A Subsidiary of Getty Mineral Resources Company

P.O. Drawer PMC

Price, Utah 84501-0904

Telephone (801) 637-2875

WAYNE

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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MAY 17 1982
PLATEAU MINING COMPANY

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

Meeting with PMC, DOGM and OSM
May 6, 1982
Page 4

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/RLM - Telecopy

cc: Steve Rigby



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

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

4244 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

May 12, 1982

Mr. Richard E. Dawes
Deputy Administrator
Office of Surface Mining
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202

Attention: Bob Bamburg, TPO

RE: Draft Comment of Proposed
Unit-Train Loadout
Plateau Mining Company
Starpoint Mines
ACT/007/006
Carbon/Emery County, Utah

Dear Mr. Bamburg:

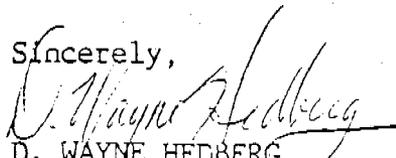
As discussed during our phone conversation of May 11, 1982, I am enclosing a copy of the Division's initial draft comments on Plateau Mining Company's (PMC) proposed unit-train loadout facility.

As of May 11th, per conversation with PMC representatives, the final decision from the parent company (Getty) had not been made as to whether the project will indeed be funded in the immediate future.

The operator has been forwarded a copy of these comments, per their request at the last on-site meeting held at the Star Point Mine offices, between OSM/DOGM/PMC and Getty Mining Company on April 30, 1982.

The Division will suspend further detailed review until such time as we receive official notification from the operator as to the final decision on this proposal and a response to our initial review. We request your comment and/or concurrence with the cursory review enclosed at your earliest convenience.

If you have any questions, please call me.

Sincerely,

D. WAYNE HEDBERG
RECLAMATION HYDROLOGIST

cc: Jim Smith, DOGM
Floyd Tucker, PMC

DWH/btb



United States Department of the Interior

OFFICE OF SURFACE MINING

Reclamation and Enforcement

BROOKS TOWERS

1020 15TH STREET

DENVER, COLORADO 80202

May 14, 1982

*File Act/007/006
DWH*

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

RE: UT-0018, Ponds 1, 3, and 5

Dear Wayne:

We require in Stipulation #7 of the approved Star Point Mining and Reclamation Plan a registered professional engineer certify that embankments which do not meet design standards meet a minimum 1.5 static safety factor. The R&M February, 1982 report shows the embankments for ponds 1, 3, and 5, do not meet this requirement. We also indicated in Stipulation 7 that stability or designs for reconstruction would be necessary if this factor is not met.

Bob Bamburg and Ken Lawver, from my office, met with you and company representatives at the mine site on April 30, 1982 to look at the ponds and discuss this situation.

As discussed with you, the following recommendations are made in regard to this problem:

1. Pond #1 — The disturbed area this pond serves is very small. It appears that an exemption could be given under 817.42(a)(3). The structure should remain in place as an alternate facility.
2. Pond #3 — The company should reconsider the cohesive values used in determining the static safety factor. If this does not solve the problem, Plateau could submit their reclamation schedule for this area and ask for relief based, as they indicated at the meeting, on plans to begin reclamation this fall.
3. Pond #5 — This pond has been constructed mainly by digging into the existing ground level. One end of the dam has about four feet of additional material and is very wide at this point. Engineering data should be reviewed for this structure. Plateau indicated an additional alternative of using pond #5 as a catch basin and passing the water on to pond 6. This should be satisfactory as long as pond 6 meets the size requirements for the addition area.

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MAY 19 1982

Sincerely,

Allen D. Klein

Allen D. Klein

Administrator

Western Technical Center

U.S. DEPARTMENT OF THE INTERIOR
OFFICE OF SURFACE MINING



United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202
June 2, 1982

Wayne
ACT/607/006

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

RE: UT 0018

Dear Wayne:

We have reviewed the Plateau Mining Company's replies to the special stipulations set in the January 21, 1982 approval of the Star Point Mining and Reclamation Plan. Our response to the adequacy of the stipulations is outlined below.

Stipulations

1. Plateau Mining Company has provided the maps as requested by this stipulation.
2. Plateau Mining Company agrees to follow the procedures and course of action outlined which meets the requirement of stipulation #2.
3. Plateau Mining Company states that they have completed the surveys specified by this stipulation and will be forwarding a report for review. This stipulation cannot be cleared until the report is reviewed and a determination is made that all lands in question have been surveyed.
4. The requirements of this stipulation have been partially fulfilled. The report identified in stipulation #3 may provide the necessary information to finalize 106 compliance with Utah SHPO. Site specific justification for why a site is or is not eligible must be provided in order to clear this stipulation.
5. Plateau Mining Company has met the requirement of this stipulation.
6. Plateau Mining Company has stated that an adequate growth medium will be provided for each area. The company also indicated that this problem is under study and will be handled on a site specific basis. Plateau still needs to provide the information requested by this stipulation.

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DIVISION OF
OIL, GAS & MINING

7. Plateau Mining Company is actively trying to meet the requirements of this stipulation. See May 14, 1982 letter to Wayne Hedberg.

8. Plateau Mining Company's response to this stipulation is adequate.

9. Plateau Mining Company has provided a plan for the control of fires as attachment #5. This stipulation has been adequately met.

10a. The stipulation requires Plateau Mining Company to identify the seed mixture to be used for topsoil stockpile stabilization and permanent revegetation. 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.

10b. Plateau Mining Company indicates that disturbed areas have been planted with an approved seed mixture and that this was coordinated with U.D.W.R. The stipulation calls for submission of a plan which addresses the density, composition, and location of woody plants to be reestablished. A plan has not yet been submitted and the company has until 1/21/83 to meet the requirements of this stipulation.

10c. Plateau Mining Company's response to this stipulation is adequate.

11. Plateau Mining Company agrees to follow the prescribed methods outlined in Stipulation #11 which is an adequate response to this stipulation.

Also attached for your information and records are the responses from the Forest Service and Minerals Management Service in regard to these stipulations. The Forest Service indicates they must approve any seed mixture for use on National Forest land.

Sincerely,



Allen D. Klein

Administrator

Western Technical Center

Attachments



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 Bamberg
OSM - Reclamation and Enforcement
Brooks Towers - 1020 15th Street
Denver, Colorado 80202



Dear Mr. Bamberg,

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



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

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

Wayne

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

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 (OSM)

- #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.

OSM
#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.

TLP #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.

DOG M
OSM #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.

OSM (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.

Mr. Floyd J. Tucker

ACT/007/006

June 9, 1982

Page 3

20611 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.

done 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).

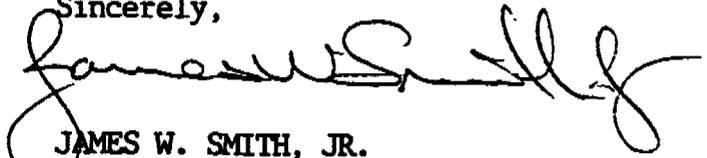
* The deadline for response and/or implementation of all other stipulations is September 30, 1982.

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



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

WAYNE
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

September 7, 1982

Mr. Allen D. Klein, Administrator
Western Technical Center
Office of Surface Mining
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202

Attention: Mr. Floyd Johnson

RE: Special Stipulation Responses
to MRP Approval, Refuse Pile
Expansion and Corner Canyon
Breakout Permit Application
Plateau Mining Company
Star Point Mines
ACT/007/006
Carbon/Emery Counties, Utah

Dear Mr. Klein:

Enclosed please find seven (7) copies each of Plateau Mining Company's latest response to the "special stipulations" assigned to their MRP Approval, and a new request for approval to breakout in Corner Canyon. This new breakout is an alternative to the previously proposed site located in Seeley Canyon.

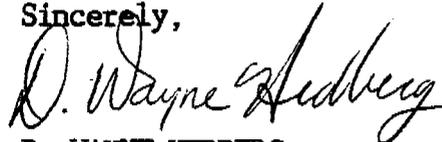
The Division is proceeding to process these submittals and will forward a copy of our response as to the adequacy of said plans as soon as the review is complete. We would solicit and incorporate any comments you may have in regard to these plans into our response letter to the operator.

Mr. Allen D. Klein, Administrator
ACT/007/006
September 7, 1982
Page 2

The Division has assessed a "target date" of September 30, 1982 to complete its review and have a response drafted for the operator (PMC).

If you have any questions, please feel free to call me.

Sincerely,



D. WAYNE HEDBERG
RECLAMATION HYDROLOGIST

DWH/btb

cc: Mel Coonrod, PMC
Jim Smith, DOGM



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

DWTT

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 [DOGM] letter) to test various depths of topsoil and subsoil replacement as well as various fertility amendments.

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. FMC 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. FMC must provide data for 1983 on germination and commit to supplying 1984 establishment and survival data.
3. FMC must provide justification concerning test plot disruption should FMC 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.

Mr. Floyd T. Tucker
ACT/007/006
August 16, 1983
Page 3

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.

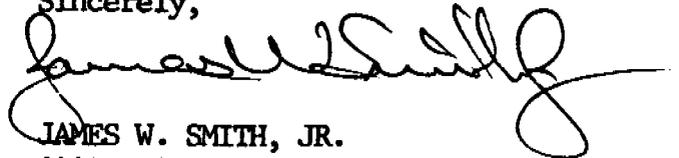
2. As per UMC 771.23(c), the company needs to supply (1) the names of persons or organizations which collected and analyzed the data; and (3) descriptions of methodology used to collect and analyze data.
3. The applicant should also supply a map showing the location of the reference area.
4. Although 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.

Mr. Floyd T. Tucker
ACT/007/006
August 16, 1983
Page 4

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

PLATEAU MINING COMPANY

A Subsidiary of Getty Oil Company

P.O. Drawer PMC

Price, Utah 84601

Telephone (801) 637-2875

RECEIVED

APR 9 1984

April 4, 1984

DIVISION OF
OIL, GAS & MINING

Mr. James Smith
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

ATTN: David Lof

RE: SEDIMENT PONDS 1, 3 & 5

Dear Jim;

We would like to ask for a variance from part of UMC 817.46(r), for Ponds 1, 3 and 5; specifically, the requirement that the ponds be inspected during construction by a professional engineer. The other two requirements were met. Our request is based on the following:

1. The Division has accepted our request for exemption from design criteria of UMC 817.42(a)(3) and redesignated Pond No. 1 as a treatment facility; see DOGM letter dated August 16, 1983.
2. The Division has accepted our presentation and re-examination of the static safety factor for Pond No. 3 and determined that Stipulation No. 7 has been met; see DOGM letter dated August 16, 1983.
3. The Division has accepted our presentation and re-examination of the static safety factor for Pond No. 5 and determined that Stipulation No. 7 has been met; see DOGM letter dated August 16, 1983.
4. In the "Review Of As-Built Runoff And Sedimentation Control Plan, Star Point Mines, Plateau Mining Company", prepared by Vaughn Hansen Associates, Inc. in December 1983, submitted to the Division January 13, 1984, the sediment ponds have been certified as having been constructed in accordance with the original design configuration; refer to Page 8 and 9.

We believe the ponds are functional and trust that this request will put to rest this issue.

-continued-

We also hope that the Division will soon approve our request of July 1983 to modify the outlet pipes in Ponds 4, 5 and 6. We are anxious to make the modifications before another season passes.

If you have any questions, please call.

Respectfully,

PLATEAU MINING COMPANY



Ben Grimes
Environmental Coordinator

BG:sd

cc: Wayne Hedberg ✓



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dianne R. Nielson, Ph.D., Division Director

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

May 23, 1984

Mr. Ben Grimes
Environmental Coordinator
Plateau Mining Company
P. O. Drawer FMC
Price, Utah 84501

RE: Variance Request From
Engineering Inspection of
Ponds #1, #3, & #5
Star Point Mines
ACT/007/006, #3, #4 and #7
Carbon County, Utah

Dear Ben:

The Division has completed its initial review of Plateau Mining Company's April 4, 1984 letter which requests a variance to the requirements of UMC 817.46(r), for sediment ponds #1, #3 and #5 at the Star Point Mines. The specific requirement that ponds be inspected during construction by a professional engineer is the basis for the variance request.

Our apologies for not being able to process this request and provide a formal response sooner. After considering the justification provided in your letter and following a perusal of our files and the pertinent documents relative to these impoundments, it is the Division's opinion that the following information is still necessary to satisfy this regulation and to justify your request for a variance to portions of UMC 817.46 (r):

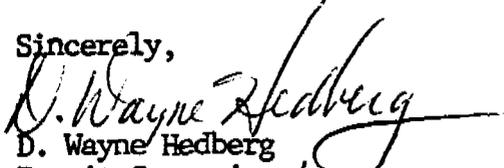
The operator will need to have the subject sediment ponds surveyed by a registered land surveyor in order to determine, if the ponds were properly sized during construction (i.e., sediment storage, dead pool storage and total storage) and if the primary and emergency spillways are at their proper heights relative to each other and to the top of the sediment pond embankment. This information would have been checked and verified if the ponds had been field inspected by a qualified registered engineer during construction and/or certified after construction.

Mr. Ben Grimes
ACT/007/006
May 24, 1984
Page Two

Upon receipt of this information, the Division should be able to complete its review of Plateau's request for a variance to UMC 817.46 (r). This information must be received by June 30, 1984. The Division is anxious to resolve this issue as expeditiously as possible also. Thank you for your cooperation in this matter.

Should you have any questions, please feel free to call me.

Sincerely,


D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

DWH/btb

cc: Allen D. Klein, OSM, Denver
Robert Hagen, OSM, Albuquerque
R. Daniels, DOGM
J. Smith, DOGM
J. Helfrich, DOGM
D. Lof, DOGM
89920-5 & 6

June 29, 1984

Memo to Coal File:

RE: Phone Conversation
Verbal Two-Week Time Extension
Plateau Mining Company
Star Point Mines
ACT/007/006, #3 and #4
Carbon County, Utah

On June 29, 1984, Mr. Ben Grimes of Plateau Mining Company (PMC) called the Division (D. Wayne Hedberg) to request a two-week extension of time to provide a response to our May 23, 1984 letter.

The letter required PMC to perform survey analyses for the as-built sediment ponds #1, #3 and #5 at the Star Point Mines. Apparently, the company is having difficulty in getting the final survey results back from the surveyor in an expeditious manner and will not be able to meet our June 30, 1984 deadline for submission of the same.

Mr. Hedberg consulted with the assigned field inspector (David Lof) for the mine before returning Mr. Grimes' call and granting the two-week extension. For more background information, see DOGM letter dated May 23, 1984, Variance Request From Engineering Inspection Ponds #1, #3 and #5.

D. Wayne Hedberg 
Permit Supervisor/
Reclamation Hydrologist

DWH/btb

cc: Ben Grimes, PMC
Ron Daniels, DOGM
Jim Smith, DOGM
Joe Helfrich, DOGM
Dave Lof, DOGM

89460-14

sig file
cc Nielson
Hedberg
Lof
Helfrich

Wayne

PLATEAU MINING COMPANY

A Subsidiary of Getty Oil Company
P.O. Drawer PMC Price, Utah 84501
Telephone (801) 637-2875

received
July 16/84
JWH

July 13, 1984

Dr. Dianne Nielson
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

RE: Sediment Ponds 1, 3 and 5

Dear Dr. Nielson:

Pursuant to the Division's request by letter from Wayne Hedberg dated May 23, 1984, we have had the subject ponds surveyed by a registered surveyor.

The attached data sheet lists the design requirements and actual capacities and elevations.

Pond No. 1

We propose leaving Pond No. 1 as is with no modifications. This proposal is based on three facts: (1) In the four year history of the pond, it has never had more than three feet of water in it; (2) In those four years, the sediment accumulation has been minimal; and (3) On August 16, 1983 the Division accepted our proposal to redesignate this pond to a treatment facility, which removes it from having to meet the design requirements of UMC 817.46.

Pond No. 3

We propose enlarging the pond and modifying the decant to the correct elevation. Enlargement will be accomplished by excavating in natural material; no additional embankment will be constructed.

Pond No. 5

We propose enlarging the pond and modifying the decant to the correct elevation. Enlargement will be accomplished by excavating in natural material; no additional embankment will be constructed.

On June 21, 1984, the Division responded to our July 26, 1983 submittal to modify Ponds 4, 5 and 6. Our response to your June 21 letter will reach the Division by Monday, July 23. We hope the questions and concerns raised by the Division can be resolved, allowing us to make all changes and corrections to Pond 5 at the same time.

July 13, 1984
Page Two

We propose starting corrective actions on Ponds 3 and 5 on August 1 and anticipate completion by September 15.

From our observations of runoff and sediment accumulations, it is obvious that the standard methods of calculating storm runoff and sediment yield are highly suspect. Ponds 1, 3, 6 and 7 receive little runoff and sediment. We cannot document a 10-year, 24-hour event at our site, but last year we had several large cloudbursts, one of which caused considerable damage to ditches on the property. This storm had to be close to a 10-year event, but none of our ponds, with exception of Pond No. 5, filled even near the spillway level.

In summary, we realize the problems with Ponds 3 and 5 and will proceed as rapidly as possible to correct them.

Respectfully,

PLATEAU MINING COMPANY



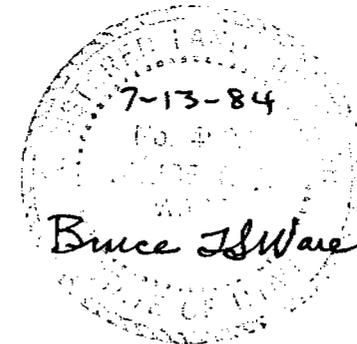
Ben Grimes
Environmental Coordinator

BG:sd

Attachment

SEDIMENT PONDS 1, 3 & 5 DATA SHEET

	POND NO. 1		POND NO. 3		POND NO. 5	
	DESIGN	ACTUAL	DESIGN	ACTUAL	DESIGN	ACTUAL
SEDIMENT STORAGE	0.39 AF	0.16 AF	1.55 AF	0.52 AF	2.27 AF	0.77 AF
DEAD POOL STORAGE	0.16 AF	0.30 AF	0.72 AF	0.75 AF	0.35 AF	0.71 AF
RUNOFF STORAGE	0.76 AF	0.83 AF	2.0 AF	1.75 AF	4.36 AF	1.66 AF
DECANT ELEVATION	7.3	7.7	7.0	7.2	8.3	10.7
SPILLWAY ELEVATION	13.0	13.0	12.0	12.0	15.5	15.5
FREEBOARD	5 FT	2.3 FT	3 FT	1.2 FT	2.5 FT	2.9 FT





STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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

DWH

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dianne R. Nielson, Ph.D., Division Director

July 19, 1984

Mr. Walter Mueller, Jr.
Vice-President
Plateau Mining Company
P. O. Drawer PMC
Price, Utah 84501

Attention: Mr. Ben Grimes

Dear Mr. Mueller:

RE: Engineering Certification of Sediment Ponds 1, 3 and 5, Star Point Mines, ACT/007/006, #3 and #7, Carbon County, Utah

Pursuant to Plateau Mining Company's (PMC) July 13, 1984 letter and to the subsequent meeting held July 16, 1984 at the Division offices regarding the recent surveying results of sediment ponds 1, 3 and 5, the following response is provided to address PMC's previous (May 23, 1984) variance request to UMC 817.46(r):

Pond No. 1

After researching the files and the history of the permitting events leading up to the Division's August 16, 1983 approval to redesignate this pond as a treatment facility, it is our opinion that the subject pond does not need to demonstrate strict compliance with all of the design requirements of UMC 817.46. The structure has met, and is in compliance with the performance standards for treatment facilities.

Consequently, PMC will not be required to obtain an engineering certification for Pond No. 1, and a variance to the same (UMC 817.46[r]) is hereby granted.

Pond No. 3

The Division concurs with PMC's proposal to enlarge the pond and modify the decant pipe to the correct elevation. Enlargement will be accomplished by excavating in natural material; no additional embankment will be constructed. This will bring the impoundment into compliance with UMC 817.46.

Page Two
Mr. Walt Mueller, Jr.
July 19, 1984

A registered land surveyor must resurvey the impoundment after reconstruction to confirm proper approved design parameters.

Upon the Division's receipt of the confirming data, the request for variance to UMC 817.46(r) will be reconsidered and most likely can be approved at that time.

Pond No. 5

The Division concurs with PMC's proposal to bring this impoundment into compliance with the requirements of UMC 817.46. In response to PMC's request for a time frame estimate for technical review of the company's proposed July 23, 1984 resubmission to the Division's June 21, 1984 deficiency letter, the following response is provided:

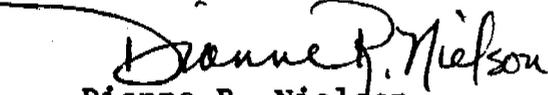
Upon Division receipt of said information from PMC to address ponds 4, 5 and 6, it is estimated that from 7 to 10 days will be required to complete the review and prepare a response.

Consequently, it is the Division's recommendations that PMC proceed with the enlargement of pond 5, but postpone the implementation of the new decant structure until final review and approval of the device is complete.

Due to the fact that the impoundment is significantly undersized and that the time period for seasonal thunderstorms is upon us, it is suggested that the company prioritize pond reconstruction activities accordingly.

Should questions arise, please feel free to call me or D. Wayne Hedberg of the technical staff.

Best Regards,


Dianne R. Nielson
Director

DRN/DWH:btb

cc: Allen Klein, OSM, Denver
Dave Maxwell, OSM, Denver
Robert Hagen, OSM, Albuquerque
Ron Daniels, DOGM
Jim Smith, DOGM
Joe Helfrich, DOGM
D. Wayne Hedberg, DOGM
Dave Lof, DOGM

89920-38 & 39

PLATEAU MINING COMPANY

A Subsidiary of Getty Oil Company

P.O. Drawer PMC

Price, Utah 84501

Telephone (801) 637-2875

FILE: ACT/007/006
Folder # 3 & 7

RECEIVED

October 15, 1984

OCT 16 1984

DIVISION OF OIL
GAS & MINING

Mr. James Smith
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

Attn: David Lof

RE: SEDIMENT PONDS 1, 3 AND 5 - NOV 84-4-11-1

Dear Jim:

We would like to ask for a variance from part of UMC 817.46(r), for Ponds 3 and 5; specifically, the requirement that the ponds be inspected during construction by a professional engineer. The Division has found that Pond 1 does not need engineering certification, see letter from Dianne Nielson dated July 19, 1984. Our request for variance is based on the following:

1. The Division has accepted our presentation and re-examination of the static safety factor for Ponds 3 and 5, and determined that Stipulation No. 7 has been met, see DOGM letter dated August 16, 1983.
2. Ponds 3 and 5 will be sized as per original design requirements.

Pond 3 has been enlarged and now meets the size requirements. Pond 5 is being enlarged presently and only lacks a small amount of excavation to be at design size.

As David Lof can testify, we have been working diligently on both ponds to bring them into compliance by deadlines imposed, and we would easily have done so except for the adverse weather we have had. We had approximately \$125,000 worth of damage done to hydrologic structures during two rainstorm episodes; one between August 19 and August 25 and another between October 1 and October 3. After the August storms, Sediment Pond 4 was completely filled with sediment and the main canyon bypass 60-inch diameter culvert was plugged along with several other major areas of damage. As a result, we had to spend considerable time and effort in resolving crisis situations which delayed our enlarging of Pond 5.

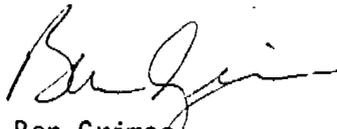
October 15, 1984
Re: Sediment Ponds 1, 3 and 5
NOV 84-4-11-1
Page Two

We will continue with an all-out effort on Pond 5 until it is brought up to design size; we should have it completed this week.

We trust you will understand our situation and hope that something can be worked out to avoid a failure to abate situation on NOV 84-4-11-1.

Sincerely,

PLATEAU MINING COMPANY



Ben Grimes
Environmental Coordinator

BG:sd



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dianne R. Nielson, Ph.D., Division Director

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

October 23, 1984

Mr. Ben Grimes
Environmental Coordinator
Plateau Mining Company
Post Office Box PMC
Price, Utah 84501

Dear Mr. Grimes:

Re: Variance request for P. E. Certification of Sediment Ponds
No. 3 and 5, Plateau Mining Company, Starpoint Mines,
ACT/007/006, Folder No. 3 Carbon County, Utah

The Division technical staff has reviewed Plateau's request received 16 October 1984 for a variance from UMC 817.46(r) for ponds No. 3 and 5.

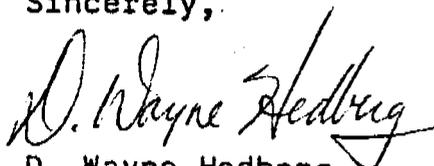
Based on an evaluation of the previously approved variance for Pond No. 1, the Division finds that the size of ponds No. 3 and 5 are significantly larger and a variance for these ponds cannot be granted. The Division requires the following information:

1. The previously required "as built" survey of the ponds showing pond capacity, elevation of spillway, dewatering device and emergency spillway and slopes of the pond embankments.
2. Certification by a registered Professional Engineer that: the pond is in good condition; the pond with the exception of interior embankment construction, has been constructed as designed (i.e., slopes, spillway elevations, pond capacity, etc.); and the pond embankments, based on previously conducted geotechnical evaluations, are stable.

Page 2
Mr. Ben Grimes
ACT/007/006
October 23, 1984

The required information must be submitted by 23 November 1984. Please call if you have any questions.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

TJS:jvb
cc: A. Klein
B. Kale
S. Linner
T. Suchoski
98500-38

Act/007/006 #3 7, 15/100
only map been route

CONSULTANTS / ENGINEERS

VAUGHN HANSEN ASSOCIATES

WATERBURY PLAZA - SUITE A
5620 SOUTH 1475 EAST
SALT LAKE CITY, UTAH 84121
(801) 272-5263

RECEIVED
NOV 27 1984

November 27, 1984

Mr. Ben Grimes
PLATEAU MINING COMPANY
P. O. Drawer PMC
Price, UT 84501

DIVISION OF
OIL, GAS & MINING

RE: Information Requested by UDOGM for Sediment Ponds No.3
and No.5, Star Point Mines

Dear Ben:

As per your request, summarized herein is the information requested by the State of Utah Division of Oil, Gas, and Mining with regard to Sediment Ponds No. 3 and No. 5 at the Plateau Mining Company Star Point Mines. In a May 23, 1984 letter from Wayne Hedberg of DOGM addressed to you, the following information was requested:

The operator will need to have the subject sediment ponds surveyed by a registered land surveyor in order to determine, if the ponds were properly sized during construction (i.e., sediment storage, dead pool storage and total storage) and if the primary and emergency spillways are at their proper heights relative to each other and to the top of the sediment pond embankment. This information would have been checked and verified if the ponds had been field inspected by a qualified registered engineer during construction and/or certified after construction.

Again in an October 23, 1984 letter from Wayne Hedberg addressed to you, the following information (pertaining to Ponds No. 3 and No. 5) was requested:

1. The previously required "as built" survey of the ponds showing pond capacity, elevation of spillway, dewatering device and emergency spillway and slopes of the pond embankments.
2. Certification by a registered Professional Engineer that: the pond is in good condition; the pond with the exception of interior embankment construction, has been constructed as designed (i.e., slopes, spillway elevations, pond capacity, etc.); and the pond embankments, based on previously conducted geotechnical evaluations, are stable.

Mr. Ben Grimes
November 27, 1984
Page 2

In accordance with the above referenced requests made by DOGM, Mr. Bruce T. S. Ware (registered land surveyor in the State of Utah) was retained to provide the "as built" survey of Sediment Ponds No. 3 and No. 5; R&M Consultants, Inc, of Salt Lake City was retained to certify that the ponds are stable; and Vaughn Hansen Associates, Inc. of Salt Lake City was retained to certify that the ponds are of adequate capacity to meet hydrologic design requirements.

From the "as built" survey conducted by Mr. Bruce Ware, an "as built" topographic map was prepared for each of the sediment ponds. The topographic maps for each of the ponds are attached hereto for your reference (Attachments 1 and 2). From the topographic maps prepared by Mr. Ware, stage capacity curves for each pond were developed. The stage capacity curves are attached hereto as Figures 1 and 2 (Attachments 3 and 4).

Runoff and sediment storage requirements for Sediment Ponds No.3 and No. 5 were summarized in a previous report prepared by Vaughn Hansen Associates (December, 1983), entitled "Review of As Built Runoff and Sedimentation Control Plan Star Point Mines, Plateau Mining Company." As indicated in the above referenced report, the three-year sediment storage requirements for Ponds No. 3 and No. 5 are 1.68 ac-ft and 2.24 ac-ft, respectively. The 10-year, 24-hour runoff volume storage requirements for Ponds No. 3 and No. 5 are 2.22 ac-ft and 4.28 ac-ft, respectively. As illustrated on Figures 1 and 2, both Ponds No. 3 and No. 5 are of adequate capacity to meet the above hydrologic design criteria. In addition to checking the pond capacity versus hydrologic design volume criteria, the ponds were visually inspected and appear to be in good condition.

R&M Consultants, Inc. in a November 21, 1984 letter addressed to you indicated that from their stability analysis the following factors of safety were obtained:

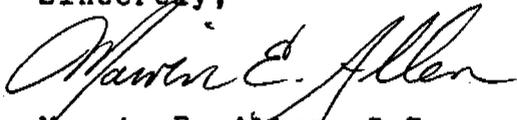
	Dry Pond (Factor of Safety)	Full Pond (Factor of Safety)
Pond No. 3	1.5	1.4
Pond No. 5	1.8	1.7

R&M Consultants' letter addressing the results of their analysis is attached hereto (Attachment 5).

Mr. Ben Grimes
November 27, 1984
Page 3

As per your request, we are sending a copy of this letter directly to DOGM. If you have any questions, please call.

Sincerely,



Marvin E. Allen, P.E.
Executive Vice President

MEA/lv

Attachments

Vcc: Wayne Hedberg
Utah Division of Oil, Gas, and Mining

ATTACHMENT 3

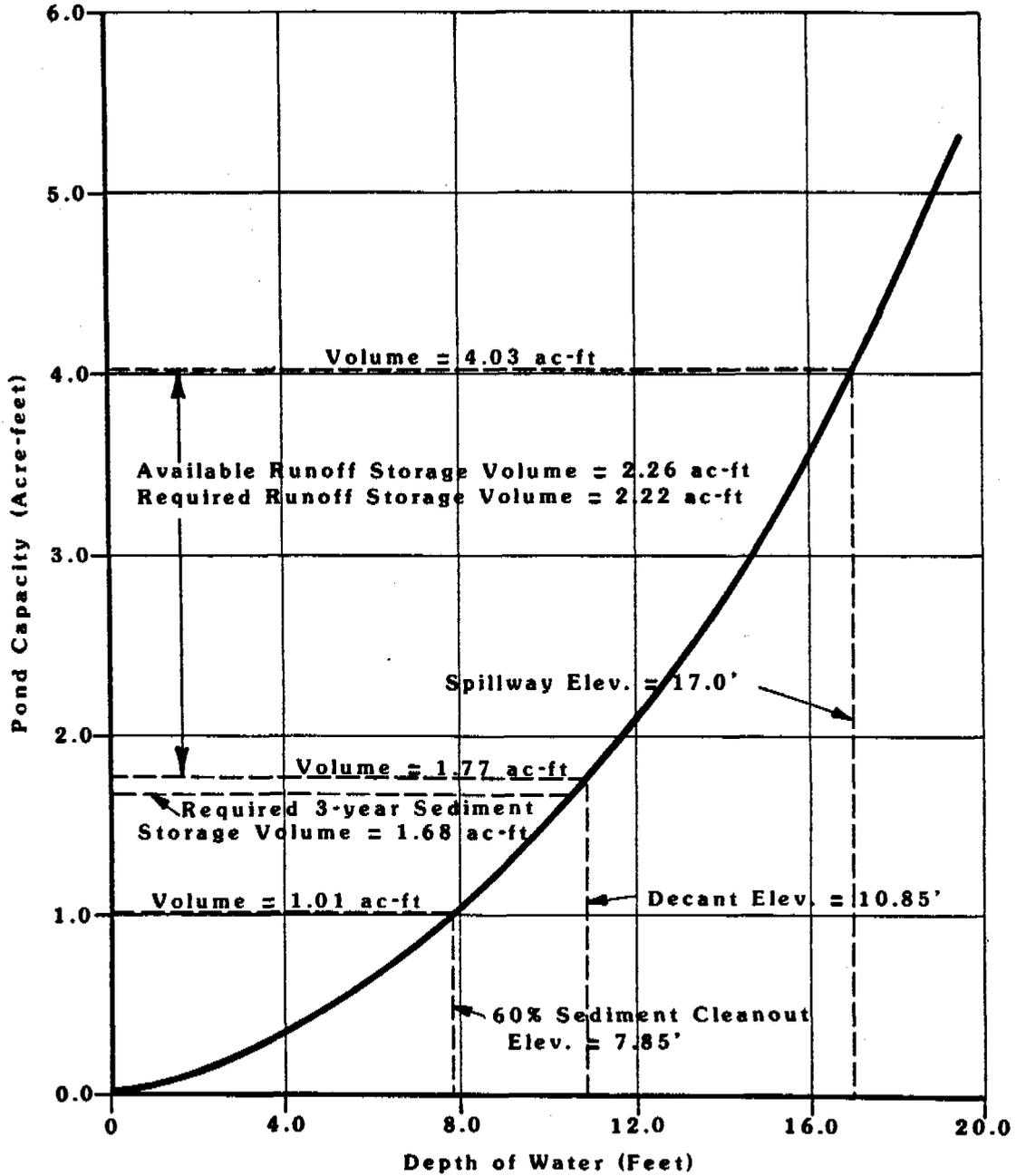


Figure 1. Stage capacity curve for Sediment Pond No. 3

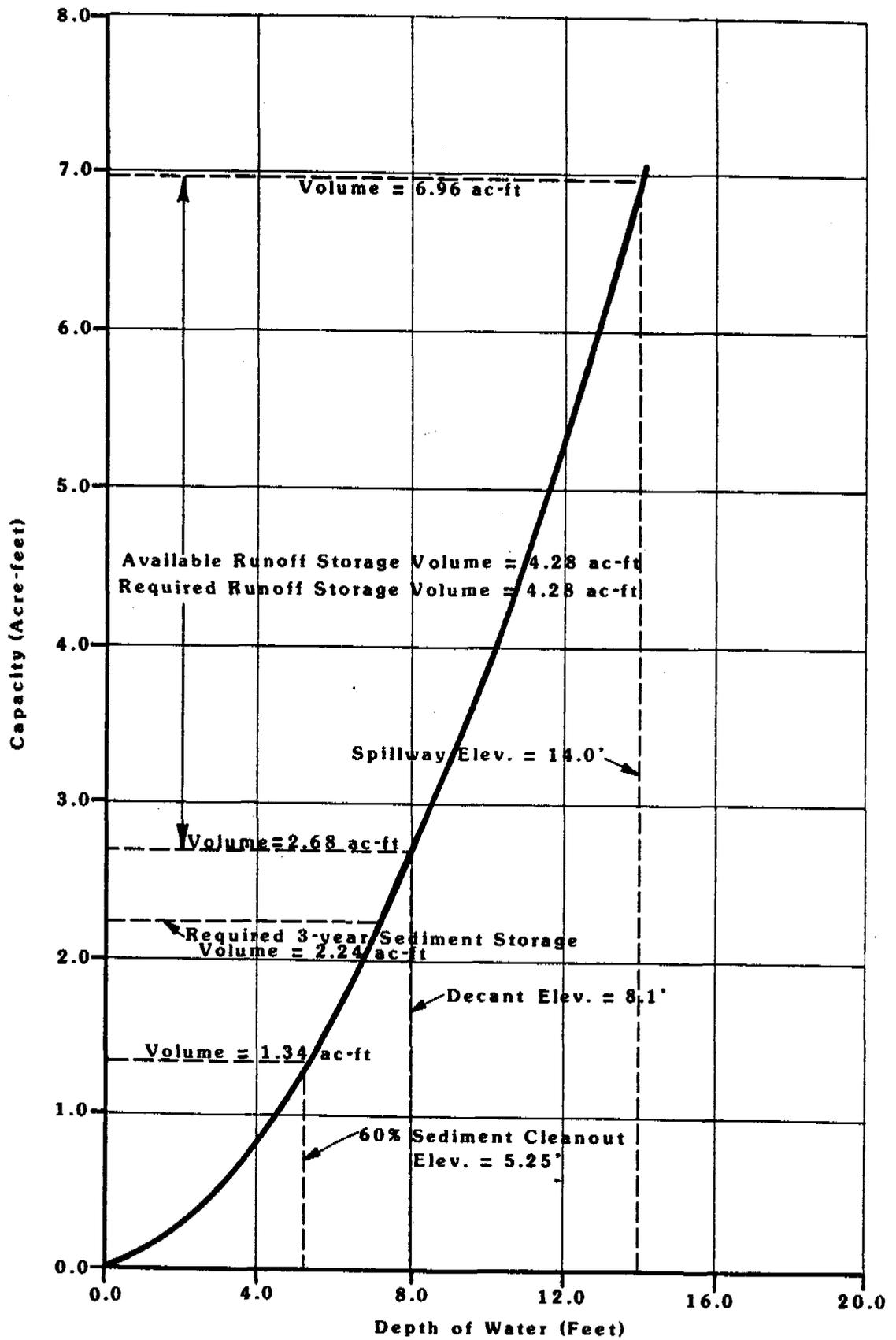


Figure 2. Stage capacity curve for Sediment Pond No. 5

R&M

R&M CONSULTANTS, INC.

ENGINEERS
GEOLOGISTS

8280 SOUTH 320 WEST, SUITE E-160

MURRAY, UTAH 84107

PHONE (801) 263-3419

November 21, 1984

Plateau Mining Company
Drawer PMC
Price, Utah 84501

Attention: Mr. Ben Grimes

Subject: Embankment Stability Analysis of Sedimentation Pond Nos. 3 and 5,
Plateau Mining Company, Wattis, Utah.

Gentlemen:

Presented below are the results of our embankment stability analyses of Sedimentation Pond Nos. 3 and 5, located on property leased/owned by Plateau Mining Company, Wattis, Carbon County, Utah. The stability analyses were conducted to determine the embankment stability following recent enlargement of Pond Nos. 3 and 5. Both the dry pond and full pond conditions were analyzed in each of the cases under static conditions.

R&M has previously conducted stability analyses of these sites under R&M Report Nos. 161024, 261001, and 261031. Soil parameters used in the present analyses were obtained from the most recent, prior R&M report (No. 261031).

Based on information provided to us by PMC, Sedimentation Pond No. 3 was enlarged by about 1,500 ft² and deepened by approximately four feet. Sedimentation Pond No. 3 was re-analyzed on the basis of topographic coverage provided by Plateau Mining Company (PMC) not available at the time of the previous analyses. Sedimentation Pond No. 5 was not deepened but enlarged by approximately 13,000 ft². Sedimentation Pond No. 5 was analyzed on the basis of the previous cross sections determined by R&M field measurements and as used in the previous analysis.

We understand from PMC that no changes in the embankment slopes, piping or spillway elevations have been made.

Our analysis was conducted using the STABL2 computer program as were our previously conducted analyses. The graphical presentation of the STABL2 program presents a series of potential failure surfaces and determines the corresponding factors of safety against failure. The potential failure surfaces are numbered from 1 through 9 and 0, (representing 10) with the sur-

Plateau Mining Company
November 21, 1984
Page -2-

face delineated by the No. 1 having the most critical value (lowest factor of safety) and the No. 0 (10) having the least critical potential for failure (highest factor of safety against failure). The results of our analysis are presented below:

	Dry Pond (Factor of Safety)	Full Pond (Factor of Safety)
Pond No. 3	1.5	1.4
Pond No. 5	1.8	1.7

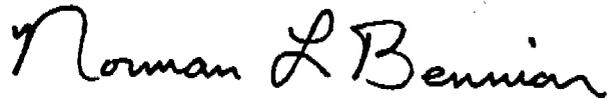
Copies of the graphical output of the STABL2 program are presented on the attached Drawing Nos. 1 through 4.

Please contact us if there are any questions on the above.

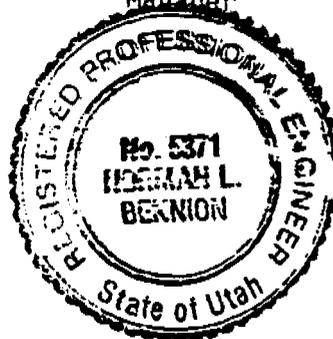


LaMonte G. Sorenson
Sr. Engineering Geologist

NLB:LGS/ljp

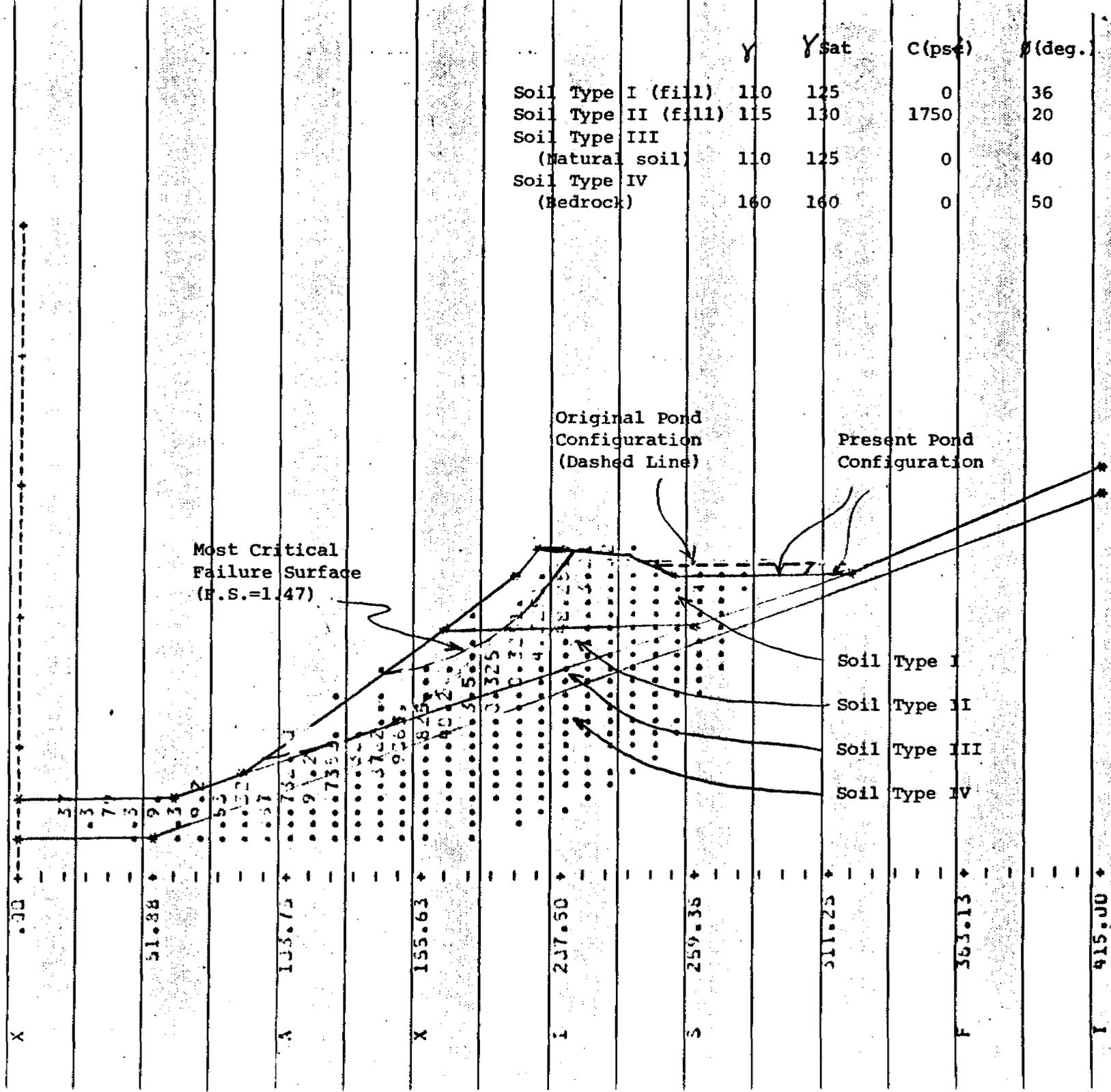


Norman L. Bennion, P.E.
Manager



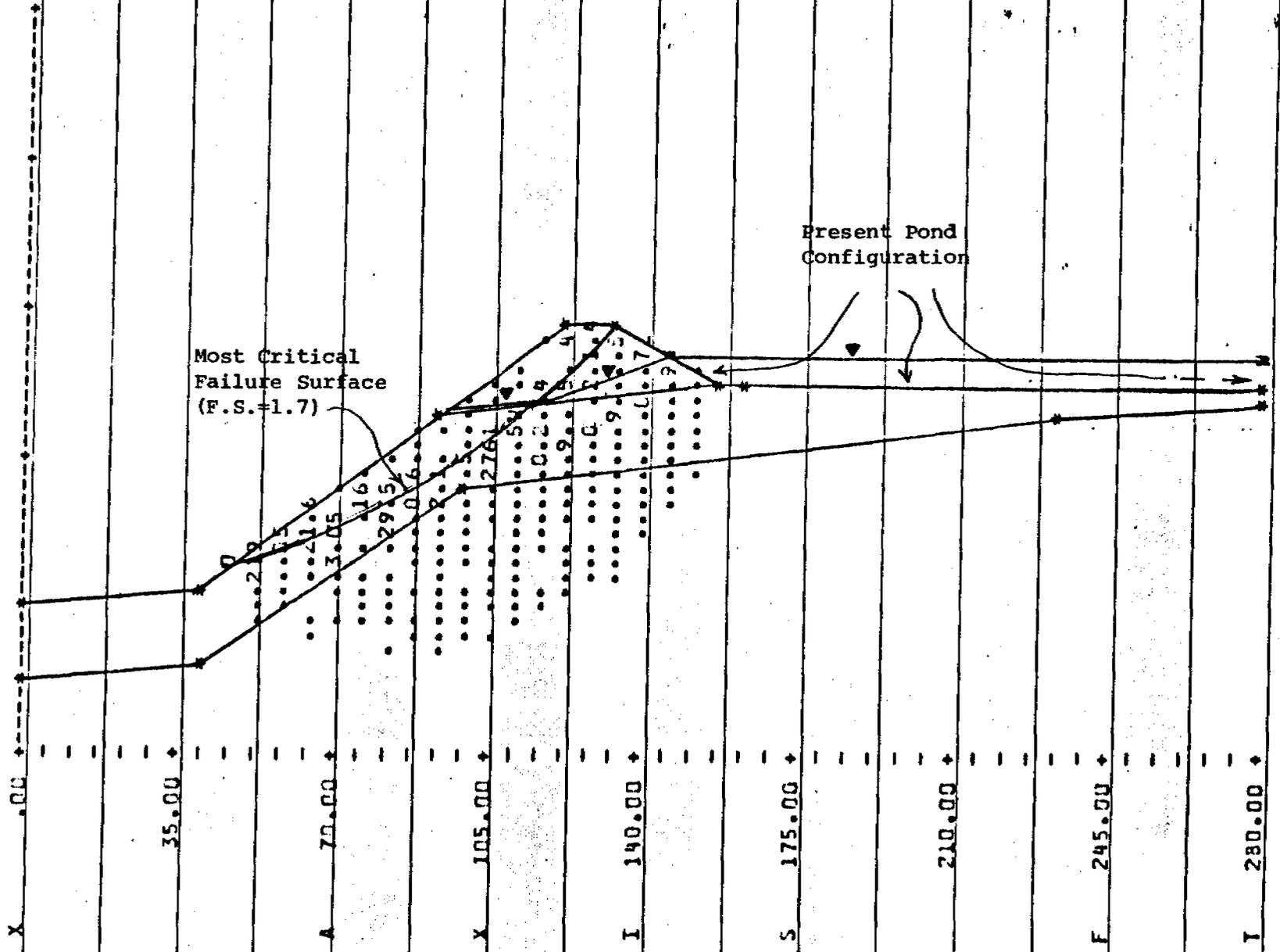
I J S I X A Y

03.652 05.722 09.561 27.781 51.83 80.00



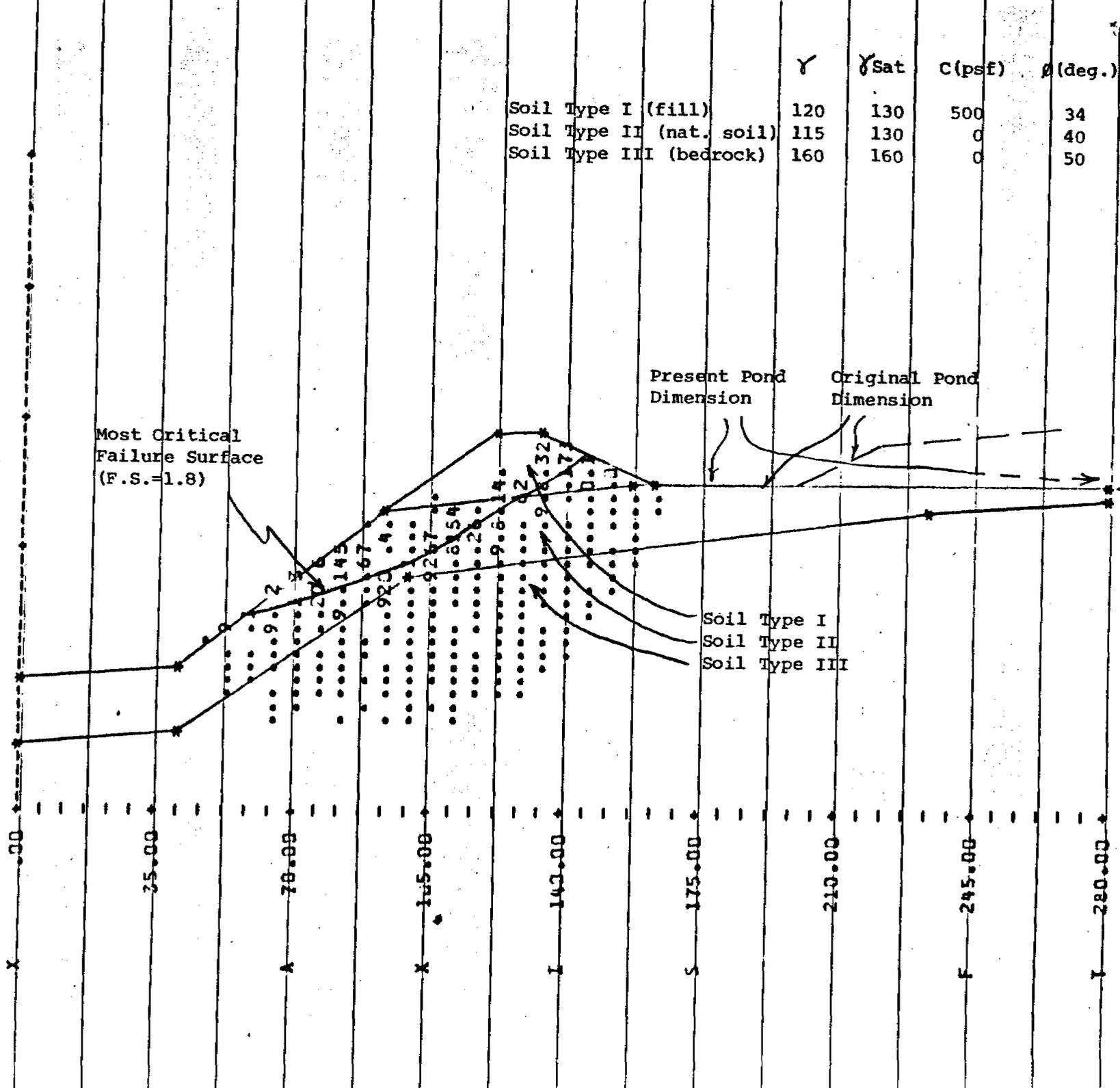
I J S I X Y Y

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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dianne R. Nielson, Ph.D., Division Director

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

December 7, 1984

CERTIFIED RETURN RECEIPT REQUESTED
(P396-996-936)

Mr. Ben Grimes
Environmental Coordinator
Plateau Mining Company
P. O. Box PMC
Price, Utah 84501

Dear Mr. Grimes:

Re: Approval of Variance Request for Sediment Ponds No. 3 and 5, Plateau Mining Company, Star Point Mines, ACT70077006, #3 and #4, Carbon County, Utah

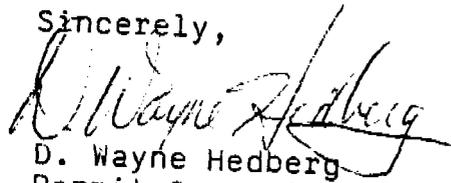
The Division's technical staff has reviewed Plateau's November 27, 1984 submission of information requested for approval of variance request for PE certification for Sediment Ponds No. 3 and 5 at the Star Point Mines.

Based on the information submitted the Division finds that pond 3 and pond 5 have adequate sediment and runoff storage capacity (see Vaughn Hansen Associates response), that the "as-built" survey of the ponds conducted and certified by Mr. Bruce T. S. Ware (a registered land surveyor) show that the designs of the constructed ponds closely approximate the approved plan; and that the stability analyses of ponds No. 3 and 5 conducted by R & M consultants show the existing embankments to be stable.

December 7, 1984

Based on the above findings, the Division hereby grants a variance of PE Certification requirements for Sediment Ponds No. 3 and 5. As a condition to this approval, the Division requests Plateau Mining Company to incorporate this information and certification variance into its Mining and Reclamation Plan (MRP) and to provide eight (8) additional copies to the Division so that the appropriate state and federal MRP's can be updated with the latest information. If you have any questions, please call.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/
Reclamation Hydrologist

Review Chronology:

- A. Operator Submittals
1. 10/16/84
 2. 11/27/84

- B. DOGM Responses
1. 10/23/84
 2. 12/7/84

TJS/jvb

cc: Allen Klein
Robert Hagen
Walt Swain
Ron Daniels
Joe Helfrich
Dave Hooper
Bart Kale
Dave Lof
Tom Suchoski

0031R-3 & 4