

0012



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

007/006-2
Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

November 16, 1987

Mr. Ben Grimes
Senior Environmental Engineer
Plateau Mining Company
P. O. Drawer PMC
Price, Utah 84501

Dear Mr. Grimes:

Re: Request for PAP Updates per USFS Request, Cyprus-Plateau Mining Company, Star Point Mine, ACT/007/006, Folder #2, Carbon County, Utah

Attached are two (2) letters, one from the Forest Service dated September 22, 1987, and the Division's response, dated November 2, 1987.

As you can see, the Forest Service has raised four issues regarding the five-year permit renewal of the Star Point Mines. The Division agrees with the Forest Service that two issues need to be addressed to completely correct the presently approved Permit Application Package (PAP). This letter is to request that Plateau Mining Company submit the requested information to address the concerns enumerated regarding the description for soil, JCG3 and the information requested on the Corner Canyon breakouts regarding Table 68 and 69, Exhibit 36.

Since neither of these items affect on-going environmental performance standards, and since reclamation is not imminent in either of these areas in the near future, this information can be submitted no later than March 31, 1988.

Thank you for your cooperation in this matter. Please feel free to contact me if you should have any questions on the issues delineated.

Sincerely,

A handwritten signature in cursive script that reads "John J. Whitehead".

John J. Whitehead
Permit Supervisor/
Reclamation Hydrologist

djh
Attachments (2)
cc: G. Morris, USFS
L. Braxton
0800R/44



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007/006 #2
Norman H. Bangertter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

November 2, 1987

Mr. George A. Morris
Forest Supervisor
Manti-LaSal National Forest
599 West Price River Road
Price, Utah 84501

Dear Mr. Morris:

Re: Response to September 22, 1987 Letter, Plateau Mining Company, Star Point Mine, ACT/007/006, Folder #2, Carbon County, Utah

This letter is in response to your letter of September 22, 1987, regarding the permit approval for the Five-Year Renewal for the Star Point Mines. Your letter raised four concerns which are addressed as follows:

1. Item 9 from your letter of March 10, 1987 noted that water monitoring analysis for certain elements be in dissolved form. The Division's position on this is to obtain the Total form of analysis. If Total levels exceed state numerical standards, then the Division will request Plateau to perform the Dissolved Analysis when laboratory methods permit.
2. Item #14 from your letter of March 10, 1987 expressed concern about soil mapping units.

(Forest Service response from their permit review.) Page 783-127 thru 783-129 cite the sources of the information used to compile Plateau's soil survey and used to draw maps 38-41.

The Forest Service is correct that several soils delineated on Map 38, Soil Profile Description, are not provided; these soils are JCG3, 31 and 33. The Division will request the description for soil JCG3 be provided by Plateau Mining Company. This soil is within the disturbed area encompassing part of the Lion Deck Access Road. Although this road is proposed to be left after mining activities have ceased for access to Gentry Mountain, this has not been approved. Soil 31 has been described further on Map #40, with descriptions given in Exhibit 14, page 48; therefore it is adequately described. Soil 33 is in a remote area within the permit area where disturbance is unlikely, therefore, the description is unimportant.

Page 2

Mr. George Morris

ACT/007/006

November 2, 1987

3. Item #15 from your letter of March 10, 1987 expressed concerns on reclamation aspects of the Corner Canyon and Seely Canyon Breakouts. The Forest Service comments on the Corner Canyon Breakouts are correct. The Division will request Plateau to correct Table 68 (Reclamation Timetable), Table 69 (Summary of Bond Calculations) and Exhibit 36 (Bond Calculations).

The Company has indicated that the Seely Canyon Breakouts were never developed. Thus no action will be taken on this issue.

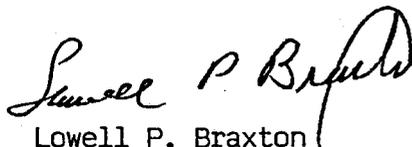
4. The last item of concern is your letter dealing with potential impacts from subsidence to the Wild Cattle Hollow drainage.

Longwall mining in the Wattis Seam is proposed to occur from 500 to 1,300 feet east (Map 6) of Wild Cattle Hollow at depths ranging from 1,200 to 1,400 feet (Map 23). Utilizing an angle-of-draw value of 22.5 percent, indicates the maximum lateral extent of surface subsidence will occur within 400 feet of the longwall panel location. Accordingly, surface subsidence will, at worst case, occur from 100 to 900 feet east of the stream occupying Wild Cattle Hollow.

The approved PAP has adequately demonstrated, on the basis of overburden thickness and a site-specific angle-of-draw, that there is a low potential for mining induced subsidence to occur beneath the drainage.

Thank you for your comments on this matter. Please feel free to contact me if you should have any further concerns.

Sincerely,



Lowell P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

djh

cc: J. Whitehead

0799R/10

Mine file (Star Point)
John Whitehead ACT/007/006

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

FILE COPY

Reply to: 2820

Date: September 22, 1987

Mr. Lowell Braxton
State of Utah Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

*John - we'd best
discuss this one
Jan 9/29*

SEP 28 1987
RECEIVED

Dear Lowell:

We received a copy of the Division's notification of Permit Approval for Plateau Mining Company's Star Point Mines on September 2, 1987.

As stated in our August 17, 1987 letter to the Division (enclosed), we identified that Items 9, 14 and 15, identified in our March 10, 1987 letter (enclosed), have not been addressed in the mine plan, nor have we received a response from the Division regarding these items.

An additional concern was identified regarding the protection of the integrity of the Wild Cattle Hollow drainage. The longwall panels of the Plateau Mine sequence will abut the stream channel as mining progresses in a southwesterly direction. Wild Cattle Hollow is a perennial stream and must be protected from subsidence. Federal Coal Lease U-13097 contains the following stipulation (Section 30, Stipulation 12):

"Underground mining operations shall be conducted in such a manner so as to prevent surface subsidence that would (1) cause the creation of hazardous conditions such as potential escarpment failure and landslides, (2) cause damage to surface structures and improvements, and (3) damage or alter the flow of perennial streams. The lessee in his mining plan shall provide specific measures for the protection of escarpments.

"The Regional Director in consultation with and concurrence of the District Manager BLM and Authorized Officer, Surface Management Agency, shall approve such measures and prescribe any additional measures to be employed such as mining methods, specify the amount of coal recovered, and determine any corrective measures considered necessary to assure that escarpment failure does not occur except at specifically approved locations, or that hazardous conditions are not created."

It has not been demonstrated in either the Mine and Reclamation Plan for the 5-year renewal or the States Decision Package that Wild Cattle Hollow will be adequately protected from subsidence.

The Manti-LaSal National Forest will not consent to the 5-year renewal until we receive a satisfactory response on Items 9, 14 and 15, and the BLM in conjunction with the Division and the Forest Service have made a determination that the mine plan provides adequate protection of Wild Cattle Hollow from subsidence, and that any necessary revisions to the mine plan are made to provide this protection.

Sincerely,



for
GEORGE A. MORRIS
Forest Supervisor

Enclosures

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Reply to: 2820

Date: August 17, 1987

Lowell Braxton
State of Utah Natural Resources
Division of Oil Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Lowell:

The Manti-LaSal National Forest has reviewed Plateau Mining Company's ACR responses for five year repermitting of the Star Point Mines and the State Decision Package for the five year renewal and New Lands Application.

Items 9, 14 and 15 in our March 10, 1987, letter to OSM have not been addressed in any of the responses. A copy of this letter is attached. The Mine and Reclamation Plan must be revised to address these items.

The Manti-LaSal National Forest boundary is incorrectly plotted on the majority of the maps included in the plan. This has been discussed with PMC. As new and revised maps are submitted, the corrections should be made.

During our review of the Decision Package, the concern was identified that the mining plan for Federal Coal Lease U-13097 may not provide adequate protection of the Wild Cattle Hollow drainage from the affects of subsidence. As discussed on page 11 of the CHIA, the longwall panels of the Plateau Mine sequence will abut the channel as the mine progresses in a southwesterly direction. Wild Cattle Hollow is a designated perennial creek on the U.S.G.S. quadrangle map.

The mine plan must provide for protection of the drainage from subsidence and the Mine and Reclamation Plan must adequately demonstrate that subsidence under the drainage will not occur.

Forest Service consent for approval of the five year renewal will be contingent upon resolution of the discussed items.

Sincerely,

/s/ William H. Boley

for
GEORGE A. MORRIS
Forest Supervisor

Enclosure

cc: D-3
C. Reed

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Reply to: 2820

Date: March 10, 1987

Mr. Richard M. Holbrook
OSM - Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Dear Rick:

Following are our comments on Plateau Mining Company's Five Year Permit Renewal Package:

1. Volume 1, Tables, Figures, Maps and Exhibits

The volume, section and page numbers where these materials are found should be included to make it easier to find them.

2. Volume 2, Exhibit 4 - Historic and Cultural Resources, Page 5-5

During 1981, a reconnaissance survey will be completed covering the remaining portions of the permit area.

Has this survey been completed? If it has been completed, the results need to be added to the plan.

3. UMC 783.22 Land-Use Information (C), Page 783-135

The portion of the permit area within the Manti-LaSal National Forest is subject to the "Land Management Plan" of the USFS (1979).

The Ferron-Price Land Management Plan, 1979, has been superseded by the Manti-LaSal National Forest Final Environmental Impact Statement and the Land and Resource Management Plan, 1986.

4. Section UMC 784.11, Page 784-3

It may be necessary to develop a vertical shaft in the vicinity of SE-1/4 to Section 14 in Lease U-13097 to allow extraction of the coal reserves within this lease.

We need to make it clear at this point in time that approval of this facility or any similar surface facilities on National Forest System lands will involve a formal application in the form of a proposed Mine Plan Amendment. The amendment must be proposed at least one year in advance of the intended date for construction, including plans and designs for the facilities and access. The approval procedure would involve an Environmental Analysis and management requirements by the Forest Service, which will be the basis for the consent decision.

5. Volume 2, Table 70

The proposed seed mix for reclamation of the Corner Canyon and Mud Water Canyon breakouts must be revised as follows:

Alpine timothy (*Phleum alpinum*) should be changed to Timothy (*Phleum pratense*).

6. Section UMC 784.14, Page 784-81, Paragraph 2

. . . monitoring stations on the west side of the Bear Canyon graben will be monitored for a two year baseline period and then will be dropped from the schedule until 1991 when operational monitoring of these sites will begin.

Three years of monitoring is needed to obtain adequate baseline data. Monitoring should also begin well in advance of mining in the area.

Map 31 shows that only spring 452 on Lease U-13097 will be monitored. Four springs within the lease have been developed by the Forest Service with troughs. They are circled on the enclosed map which was copied from Map 30. One of the springs was not identified by Plateau Mining Company. These springs must be monitored such that impacts from mining will be detected.

7. Section UMC 784.14, Page 784-82

Arsenic, boron, barium, cadmium, and chromium are detected occasionally in several streams in this area. They should be monitored on at least a five year basis to determine if it is being concentrated by the mining operation.

Mercury has been found in the sediments and fish in Scofield Reservoir. Mercury should be monitored to show positive data that it is or is not being concentrated by the mining operations.

Nitrogen and phosphorus should be continued. They are elements leading to eutrophication of lakes. Scofield Reservoir is eutrophic and phosphates are believed to be the cause. Nitrate in excess can cause health problems, and water obtained from Tie Fork and Mud Creek is used by municipalities.

We have no objection to dropping Kjeldahl nitrogen, copper, nickel, and selenium.

8. Section UMC 784.14, Page 784-86

Baseline water quality samples will be analyzed for the parameters listed in Table 80, Baseline Low Flow Water Quality Analytical Schedule.

The reference to Table 80 above must be changed to Table 82.

9. Section UMC 784.14, Page 784-87

Since State numerical standards for these elements are in the dissolved form, the analyses should contain the dissolved parameters.

10. Section UMC 784.14, Page 784-89

Flow hydrographs for springs SF-1, S11-1, S17-2, 748, 741, and 753 (which are springs monitored over the past five years as part of the monitoring plan) are presented on Figure 13, Flow Hydrographs - Springs.

This information is not included as stated.

11. Section UMC 784.21, Page 784-146

No wetlands or riparian areas exist in the vicinity of surface operations.

Riparian areas include all areas within 100 feet horizontal distance of the mean high water line of any perennial water [36 CFR 219.27(e)].

What about Corner Canyon and Mud Water Canyon? They are considered perennial downstream from the mine. They could contain riparian vegetation in the permit area.

12. Table 11

Flood frequencies must apply to a particular point on the stream. For the data to be meaningful, the locations where the flood frequencies were measured must be indicated.

13. Exhibit 7

The cumulative water quality monitoring reports show negative values for some parameters. The water quality summaries and analysis of these data with regard to water pollution hazards need to be reviewed to see if the negative values have been erroneously entered into the calculations.

14. Exhibit 19, Soils Information

The exhibit should cite the sources of information and contain a reference to the soils map (Maps 38-41).

Several soil units have been delineated on Map 38 without soil map unit descriptions. All of the mapped units should be accompanied by a description.

15. Table 68

The Corner Canyon Breakouts also include a tank and deck. These must be included in the Area and Facilities column. The Reclamation Activities column discussion must be revised to state that the breakouts will be sealed from within the mine. In addition, it must be added that the disturbed area will be backfilled with subsoil stored in the mine and retopsoiled with the specifically stockpiled topsoil. The area must be contour trenched or waterbarred and seeded. The only access is from within the mine.

Add the Seeley Canyon Breakouts to the table. Indicate that they will be sealed and backfilled.

The Manti-LaSal National Forest has not routinely received hydrology information. This information must be sent to the Forest when it is submitted to the Utah Division of Oil, Gas and Mining. Annual reports for past information will be adequate for our needs. New information, including the quarterly water monitoring reports, should be sent to the Forest.

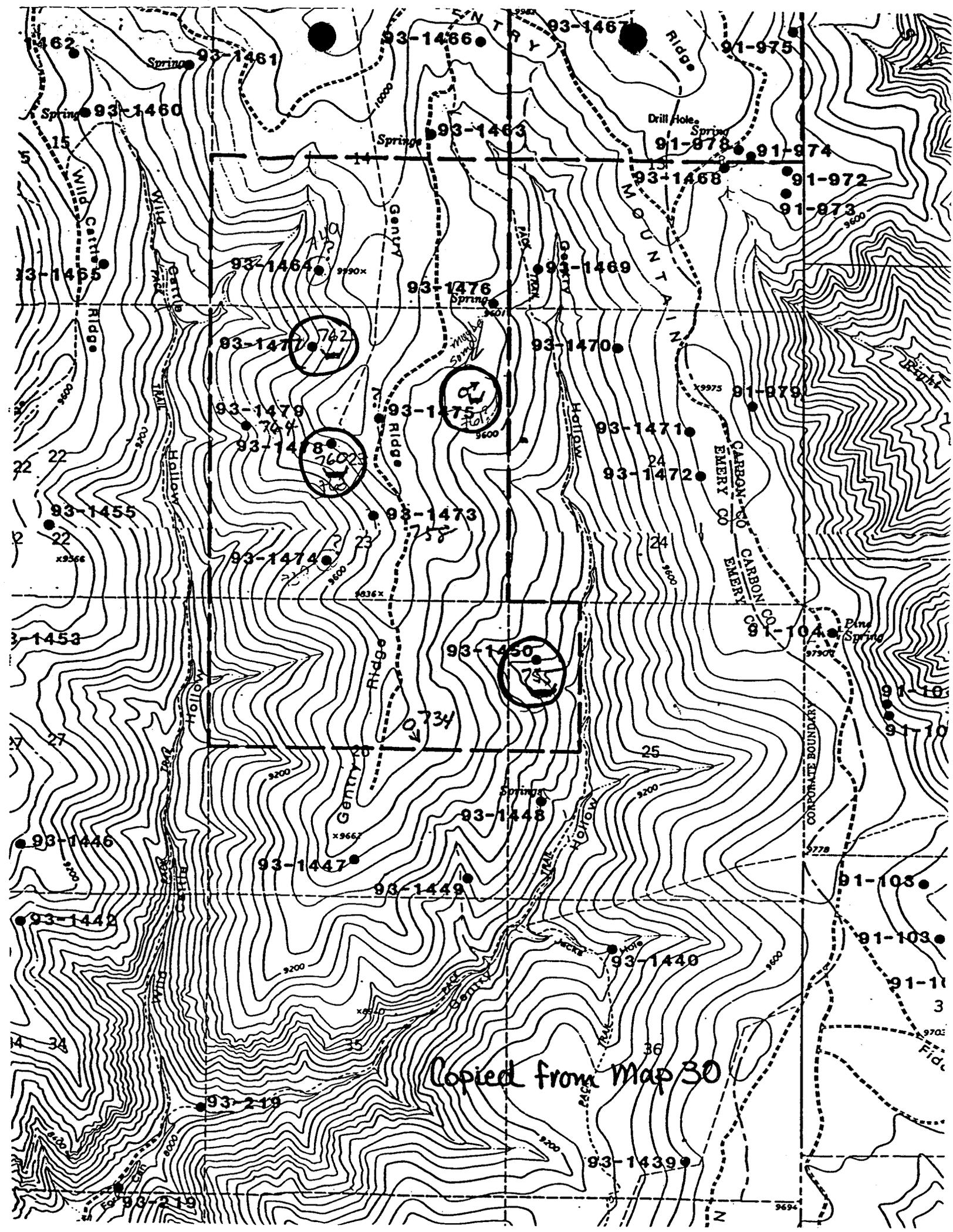
Sincerely,

/s/ William H. Boley

for
REED C. CHRISTENSEN
Forest Supervisor

Enclosure

cc: Lowell Braxton - UDOGM, D-3, C.Reed



Copied from Map 30