

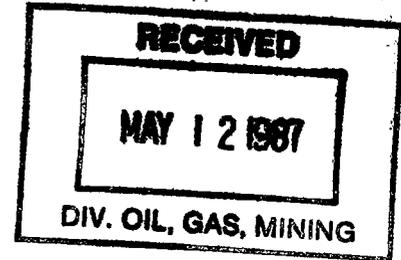
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STATE OF UTAH
NATURAL RESOURCES
Wildlife Resources

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CC: DR NELSON
KEMAY
LP BRAXTON
OFFICE - MINE FILE
Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
William H. Geer, Division Director
A07/007/006



May 8, 1987

Dr. Dianne R. Nielson, Director
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Attn: John Whitehead

Dear Dianne:

The division has evaluated Plateau Mining Company's "New Lands Application" revision for the Star Point Mines. The following comments for that Mining and Reclamation Plan are provided for your consideration.

Page 783-122, second paragraph: If it becomes necessary to grout subsidence cracks in Miller Creek, special attention to precluding the grout from entering the stream's flow will be necessary. Temporary coffer dams or diversions could accomplish this task.

Page 784-62, b and c: The discussions on this page relative to resolving potential subsidence problems in Miller Creek are in discordance with page 783-122. Grout has a cement base and is not the same as bentonite or epoxy. Either grout or bentonite or epoxy is acceptable for sealing the potential cracks. Stream protection must be incorporated while these or any other materials are placed in the cracks.

Page 784-148, a, last paragraph: Mine water discharge is acceptable as mitigation for potential loss of water in Miller Creek. However, such would not be acceptable for loss of seeps or springs. Note, a significant impact on wildlife is perceived when 50% of average daily flow at a seep or spring is lost due to subsidence. The dispersion of wildlife is regulated by dispersion of water; guzzlers or some other acceptable method of mitigation must replace lost water at the site of loss.

Page 784-147, eagles: Comments provided by the applicant relative to negotiations with DWR and USFWS for subsidence/eagle nest monitoring and a "take permit" with mitigation stipulations are acceptable.

Thank you for an opportunity to review the MRP and provide comment.

Sincerely,

William H. Geer
Director