



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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April 17, 1987

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

Ben
Dear Mr. Grimes:

Re: Five Year Permit Renewal Deficiencies, Plateau Mining Company, Star Point Mines, ACT/007/006, Folder #2, Carbon County, Utah

The Division Technical Staff has reviewed the material submitted by Plateau on March 13, 1987, in response to the Division's deficiency letter of February 9, 1987. There are still a few minor items which must be resolved prior to the five-year renewal permit with stipulations being approved. These are as follows:

1. The permit area map, Map 71, does not reflect the graben crossing in Section 14, T15S, R7E. Please revise this map to show the crossing.
2. Several changes to the text in the revegetation portion of the plan must be made to clarify the meaning of this section. Attachment A to this letter delineates the specific areas and suggests language in most cases to assure clarity is achieved.
3. The "510 C" clearance from OSM must be completed prior to permit issuance. Please advise the Division as to the status of the latest request from OSM regarding the Cyprus operations which were delinquent in filing AML reports.

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4. Comments on the 5-year renewal application from the Manti-LaSal National Forest were received by the Division on March 23, 1987. After a careful review of each item, it appears that item numbers 2, 3, 4, 5, 11, and 12 of that letter are relevant at this time. Please respond to these items.

Please respond to these items no later than May 15, 1987 and thank you for your cooperation in this matter. Call me if you have questions.

Sincerely,


Lowell P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

JJW/djh
cc: P. A. Rutledge, GSM
Tech Review Team
0800R/74

ATTACHMENT "A"

UMC 817.112 Revegetation: Introduced Species (KMM)

Plateau Mining Company provided an excellent justification of introduced species in their seed mixes. Please revise the MRP to include this species-by-species, area-by-area justification (Response 3/13/87, p. 15-26), substituting it for the discussion proposed in Response 44-52 and the original submission, p. 784-41 through 48.

UMC 817.114 Revegetation - Mulching (KMM)

1. In the January 7, 1987 response package, Plateau Mining Company carefully allayed the Division's concern that the proposed 20 pounds per acre of annual grain was too heavy a seeding rate for live mulch. If the 50-80 pounds proposed in the March 13, 1987 submittal is a typographical error, please correct it. If it is not an error, please justify these heavier rates.
2. Plateau Mining Company is correct that the Division's concern is in getting the seed properly covered, rather than in specifically requiring drill seeding. The revised wording, however, still determines mulching based on the slope rather than the seeding method; i.e., it refers to areas that are "flat enough to be drill seeded, or dragged with a harrow..." rather than areas that "are drill seeded or dragged..." In addition, the last sentence of this revised paragraph (January 1, 1987, p. 56) still indicates that these "flat enough" areas will be drilled, i.e., "All sites will then be drill seeded on the contour..." Please revise this paragraph to clearly state Plateau Mining Company's intention. The following is recommended:

"All areas ~~flat enough to be~~ that are drill seeded or dragged with a harrow or drag chain to assure adequate seed coverage will not have an organic mulch applied. Stabilization practices to be employed on these areas will consist of a combination of treatments involving chisel plowing or shallow ripping, leaving the regraded landscape in a roughened condition with all final grading being conducted parallel to the contours. Small surface depressions parallel to the contour such as pits or contour furrows will be constructed. All sites will then be drill seeded on the contour to minimize the potential of erosion and rilling or will be broadcast seeded and harrowed or chain dragged."

UMC 817.116 Revegetation: Success (KMM)

1. Response p. 12, last sentence of first paragraph: Should "The revegetation success standard..." read "The production success standard..."? Please correct or clarify if it isn't a typo.
2. Map 73 should be revised to include the Mudwater Canyon disturbance (Sheet 5), the Corner Canyon portal area, and exploration disturbance areas.
3. Map 34, Disturbed Area Vegetation, should be revised to include exploration disturbance areas.
4. If Plateau Mining Company still wants to discontinue upper, middle and lower slope sampling of 1982 refuse study plots (as discussed previously), include a statement to that effect in the discussion of monitoring p. 30, paragraph 3. Approval of the permit renewal will then constitute approval of this change in the sampling plan.
5. The test plot designations on Map 34, Borrow Area Study Plots (1981), and Office Road Fill Study Plots (1982), do not clearly indicate that these are the test plots described as being installed by Native Plants in 1980 (p. 28). If the date designations on the map are correct, please correct the text or correct the map labels if they are wrong.

Please indicate, on p. 28, paragraph 3 or 5 and/or p. 27, paragraph 5, that the location of the 1980 Refuse Test Plot is not indicated on the map.

6. Change typo, 1976 to 1986, p. 29, paragraph 5.