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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

ACT/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

February 25, 1987

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

Dear Mr. Grimes:

Re: Review of New Lands Application, Plateau Mining Company,
Star Point Mines, ACT/007/006, Folder #2, Carbon County,
Utah

Attached is the draft Initial Completeness Review of the New Lands Permit Application for the Star Point Mines. Since the New Lands Application is a compilation of changes and adjustments to the 5-year permit renewal, which is not finalized, this initial review is subject to change to accommodate changes made in the 5-year permit renewal.

As we discussed in December, 1986, Plateau should make the changes indicated in the attached review and submit either 14 copies of the new lands application or 11 copies and 3 sets of updated material such that the Division will have 14 complete sets.

Please feel free to contact me if you have any questions on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Lowell P. Braxton".

Lowell P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

JJW/djh
cc: Tech Review Team
0800R/60

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INITIAL COMPLETENESS REVIEW

Plateau Mining Company
Star Point Mine
ACT/007/006, Carbon County, Utah

February 19, 1987

UMC 771.23(e)(1) (PGL)

A "permit area" map at the scale of 1" = 500' for the entire Starpoint Mines permit area, including new lands, must be submitted.

UMC 782.13(a)(2) (PGL)

The property shown in T15S, R8E Sec. 15 that is included in the permit area is shown as being owned by "U.S.A.". The application must contain a right of way from the Bureau of Land Management to include this area in the permit area.

UMC 783.14 (RVS)

The application must include overburden/interburden/underburden chemical analyses from boreholes 86-18-1 and 86-18-2 to determine whether acid-forming, toxic-forming or alkalinity-producing materials are present in potential underground development waste rock.

UMC 783.17 (RVS)

The application must specify (list) those underground sources of water (springs) that may be impacted by mining-induced subsidence within Section 18. Moreover, the application must identify the alternative sources of water supply that could be developed to replace those above-listed underground sources of water.

UMC 784.12 Operation Plan: Existing Structures (PGL)

Are there any existing structures that are now in the permit area and were not included before? Please clarify.

UMC 784.14(b)(3) (RVS)

The application must contain a plan for the collection, recording and reporting of ground-water (spring) quality and quantity data within Section 18. The Division recommends that the reporting of data be incorporated into the Water Monitoring Plan for

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the five year permit renewal. Moreover, data reporting should include discharge-recession curves for monitored springs that may be impacted by mining-induced subsidence.

UMC 784.19 Underground Development Waste (PGL)

The sampling of the underground development waste in the "new lands" area must be contained in the permit application as outlined in the 5-year permit renewal deficiency letter (see letter to Ben Grimes from Lowell Braxton dated February 9, 1987).

UMC 784.20 (RVS)

The application proposes to conduct longwall mining beneath the North Fork of the Right Fork of Miller Creek (NFRFM), a perennial stream. The operator recognizes that surface tension cracks may develop within and adjacent to NFRFM, and therefore, may cause material damage or diminution of value or foreseeable use of the land. Accordingly, the operator has derived a subsidence control plan that includes monitoring (annual inspection and, if necessary, streamflow) and mitigation (grouting of tension cracks).

Inasmuch as the application proposes to conduct mining beneath a perennial stream and has identified the potential for material damage or diminution of value or foreseeable use of riparian habitat, subsequent permit review will require evaluation of compliance with UMC 817.97, UMC 817.121, UMC 817.124 and UMC 817.126. The Division recommends that the proposed subsidence control plan be amplified to incorporate:

1. A pre-mining photographic (or VCR) documentation of the NFRFM channel status for the segment that overlies projected mine workings and therefore, may experience subsidence impacts (i.e., tension cracking, catastrophic failure).
2. An increased inspection schedule for channel segments overlying areas of active mining to identify the initiation and development of subsidence impacts.
3. A general description of the program to restore or rehabilitate subsidence-impacted segments of NFRFM that includes (i) how personnel (and materials) will access the site, (ii) the method of grout injection or surface stabilization and whether diversion of the stream will be required, (iii) remedial measures for failed grout or surface stabilization, and (iv) a schedule for implementing mitigative action.

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UMC 784.21 Fish and Wildlife Plan (KMM)

This section requires a plan to explain how PMC will utilize impact control methods, management and monitoring to protect and enhance habitats of high value including riparian areas and cliffs supporting raptors. The application addresses both the NFRFM Creek and Golden eagle nests in general terms. The plan does not, however, provide sufficient detail to evaluate whether or not the resource will be protected.

Miller Creek

1. See control plan comments in UMC 784.20.
2. Page 784.92a mentions that 134 gpm mine water are discharged annually. Is this water suitable for cattle and wildlife? If so, would development of this resource help mitigate for potential loss of springs or from Miller Creek? If not, is the quality poor enough to be a hazard to livestock or wildlife and require remedial measures? Please describe this water resource in the MRP, indicating its usefulness, hazards or other conditions relative to wildlife.

Raptors

1. The subsidence analysis and discussion addresses general lowering of the land surface and surface cracking but does not specifically address the potential effects on cliff nesting habitat. The application should contain any currently available data on this issue including likely direction of cliff tilt. Also, the application should include detail for studies which will investigate the effects of longwall subsidence on cliff faces as proposed on page 783-125.
2. A detailed raptor monitoring study should be included to allow the appropriate wildlife agencies to evaluate whether or not reasonable data could be obtained in such a study. Monitoring plans should, where possible, be comparable to other eagle/subsidence monitoring studies in progress, e.g., UP&L Wilberg/Cottonwood Mine. An approved study could be modified later if additional data obtained over the next few years suggest more useful methods.
3. Page 784-140 indicates that "nesting sites are in the interior of planned longwall panels which should ensure a gradual uniform dropping of the land surface." In this statement is

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'interior' used in the sense of (a) from the beginning to end of the panel (which appears to be true), or (b) interior considering the width of the panel (which does not appear to be true from map overlays)? Please clarify.

UMC 784.23 (PGL)

(b)(2) The area of land for which a performance bond will be posted must be shown on a map for the "new lands" added.

(b)(11) The cross section of the Lion Deck road for the final configuration shows only 1 cross section. There should be at least 2 more.

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TECHNICAL DEFICIENCIES

Plateau Mining Company
Star Point Mine
ACT/007/006, Carbon County, Utah

February 19, 1987

UMC 817.43 Hydrologic Balance Diversions (TM)

Complete surface water hydrology information has not been submitted. Ditch No. 27 is to be designed and placed along an existing access road to Sediment Pond No. 4, located in Section 10, T15S, R8E, and will collect runoff from the road (page 784-74a, New Lands Application). Silt fences and sediment traps will be incorporated into this design. Ditch No. 27 does not show, or is not labelled, on Map 43. The application must provide ditch design information, including silt fence or sediment trap designs.

UMC 817.44 Hydrologic Balance: Stream Channel Diversions (TM)

The application must include reclamation plans for Ditch No. 27.

UMC 817.48 Acid-Forming and Toxic-Forming Materials (DD)

The findings in this section can be made when data for Section UMC 783.14 has been submitted.

UMC 817.71-.74 (PGL)

See 784.19

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