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December 3, 1987

TO: John Whitehead, Permit Supervisor
FROM: Pamela Grubaugh-Littig, Reclamation Engineer *egl*
RE: Stipulation Responses, Received October 29, 1987, Plateau Mining Company, Starpoint Mines, ACT/007/006, Folder #2, Carbon County, Utah

I reviewed the following stipulations enclosed with this Plateau submittal:

- UMC 817.11-(1)
- UMC 817.49-(1)
- UMC 817.71-.74-(1)
- UMC 817.101-(1)
- UMC 817.150-.176-(1)

I will numerate the review per regulation and its adequacy.

UMC 817.11-(1) Signs and Markers

The applicant responded to this stipulation in a written response to be added to the PAP. The language is acceptable and adequate.

UMC 817.49-(1) Permanent Impoundments

PMC stated that no response is required. A commitment should be included in the PAP declaring that "Prior to final reclamation, PMC will submit definite plans for the disposition of all of the impoundments. If any of the impoundments are retained permanently, all of the criteria will be met according to UMC 817.49." This stipulation requires a commitment from PMC.

*Stip
did
not
have
time*

UMC 817.71-.74-(1) Disposal of Excess Spoil

The operator projects one million tons of coal refuse will be produced during the permit term, 1987-1992. This part of the stipulation response is adequate.

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UMC 817.101-(1) Backfilling and Grading

The operator previously responded to this stipulation (July 27, 1987). After reviewing that submittal, additional questions arose in two memoranda dated August 19, 1987.

The stability of the backfilled areas is still only partially addressed as outlined in the memo of August 19, 1987. The figure has been corrected and the strength parameters shown. However, PMC has still not explained where the samples for engineering characteristics were taken to adequately represent all of the backfilled areas.

Therefore, Plateau Mining Company must explain where samples were taken of the site so that they adequately demonstrate they are representative of all of the backfilled areas.

The cover letter to Ben Grimes from John Whitehead, dated September 9, 1987 (attached), requested a map identifying all highwalls to be retained. This map, locating the retained highwalls, must still be submitted.

UMC 817.150-.176-(1) Roads

PMC submitted a revised Table 69 (Summary of Bond Calculations) that noted only 3 road designations. This summary means that roads "D" through "K" were not included in the bond estimate.

Plateau Mining Company should redo Exhibit 36 and identify the road designations in the calculations and verify that all road reclamation costs are in the bond estimate. (See memo to John Whitehead from me dated August 19, 1987, attached.)

In summary, regulations UMC 817.11 and UMC 817.71-.74 (my portion) have been addressed adequately. The other regulations, UMC 817.49, UMC 817.101, and UMC 817.150-.176 are still insufficient as submitted. The requirements for sufficiency were outlined above.

djh
Attachments
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