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May 25, 1989

TO: Richard V. Smith, Permit Supervisor

FROM: Pamela Grubaugh-Littig, Reclamation Engineer *pgl*

RE: Stipulation Response, UMC 817.101-(1)-(PGL), (Submittal Received April 28, 1989), Plateau Mining Company, Starpoint Mines, ACT/007/006, Folder #2, Carbon County, Utah

Synopsis

The response to UMC 817.101 has recently been revised. The text describes Exhibit 44 as an analysis of backfilled areas and implies this investigation is for the entire disturbed area.

Analysis

Exhibit 44 is described on page 817-19d as "an analysis of backfilled areas...demonstrating that a 1.3 static safety factor can be achieved on reclaimed areas." However, Exhibit 44 had only one figure entitled "haul road stability investigation" and one Section A-A. It is difficult to extrapolate from one section and only a small portion of the permit area and conclude that one backfilled area applies to the entire disturbed area.

Recommendation

The limited stability analysis of one backfilled area does not demonstrate that all of the backfilled areas will meet the minimum required safety factor. Plateau Mining Company must submit for inclusion in the PAP, a comprehensive analysis that demonstrates the required static safety factor of 1.3 can be achieved for all of the reclaimed areas.

djh
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