



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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Governor

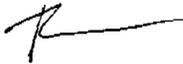
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September 14, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Thomas Munson, Senior Reclamation Hydrologist 

RE: Plateau Refuse Pile Division Order, Cyprus Plateau Mining Corporation,  
Star Point Mine, ACT/007/006, Folder #2, Carbon County, Utah

## Synopsis

This review will attempt to bring together any operational issues or reclamation issues which are outstanding or deficient in the PAP.

## Analysis

R645-301-742 states that the appropriate sediment control measures will be designed, constructed, and maintained using the best technology currently available (BTCA) to prevent, to the extent possible, additional contributions of sediment to stream flow or to runoff outside the permit area and to minimize erosion to the extent possible.

The PAP is deficient in that it fails to specifically identify how this will be accomplished with the methods proposed in the reclamation plan. The plan currently shows that the ponds will be removed upon initiating reclamation contrary to the requirements of the rules. The operator is responsible for providing treatments for all reclaimed areas specifically outlining the BTCA for each area which meets the requirements of R645-301-742. The operator has argued that it is impossible to leave the ponds in place during reclamation because of road removal and subsequent access. On page 700-181 the PAP talks about "silt fence sediment traps used at several locations throughout the permit area to control sediment loss from roadside ditches as discussed in section 742. This is certainly inadequate to address the requirements of sediment control and erosion control for all reclaimed areas.

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In order to comply with this rule, the operator must have an approved plan which addresses sediment and erosion control for all reclaimed areas. The operator must discuss the BTCA measures which will be used to comply with R645-301-742. This discussion will include how these BTCA measures will be designed, constructed, and maintained. The removal of these structures, if necessary following bond release, will be addressed in this plan.

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PLATREC