



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Kathleen Clarke
Executive Director

Lowell P. Braxton
Division Director

1594 West North Temple, Suite 1210

PO Box 145801

Salt Lake City, Utah 84114-5801

801-538-5340

801-359-3940 (Fax)

801-538-7223 (TDD)

July 14, 2000

Mr. Johnny Pappas, Sr. Environmental Engineer
Plateau Mining Corporation
847 Northwest Highway 191
Helper, Utah 84526

Re: Reclamation Plan Improvement, Plateau Mining Corporation, Star Point Mine,
ACT/007/006, Outgoing file

The Division is in the process of evaluating the reclamation plan for the Star Point Mine concurrently with the Office of Surface Mining (OSM) as part of our annual team review of the state regulatory program. The joint evaluation deals with the elimination of highwalls and achieving approximate original contour (AOC) requirements.

Following review and our field visit to the site on April 13, 2000 we have met with OSM and in summary, have the following comments and recommendations regarding the reclamation plan for the Star Point Mine:

1. Evaluation of the reclamation plan was found to be difficult regarding highwall elimination and backfilling and grading requirements primarily due to map scale and the accuracy of the cross sections provided in the reclamation plan. Although the evaluation team was able to determine that the plan adequately accounted for highwall elimination, several questions regarding the location and extent of the backfilling and grading plans for cutslopes and other disturbed areas remain.
2. The reclamation plan needs to be more clear and concise in regard to the Lion Deck facilities and the adjacent portal and storage areas. The location and configuration of the county road through this area and details of how the road will affect final surface contours and drainage need to be more specific in the plan. Current cross sections in the reclamation plan do not clearly or accurately depict the geometry of the road, its final location, the extent of backfilling filling to be accomplished, or show the solid portion of the bench to indicate the road will be suitably located for long-term stability.
3. It is strongly recommended by the Division that the site be surveyed using aerial photogrammetric methods and re-mapped prior to developing detailed reclamation plans

for construction. In addition to resolving questions and problems related to permitting, a new series of maps for the site would significantly benefit the actual design and construction phase for reclamation. New maps would provide an accurate basis for cost estimation and earthwork volumes for measurement and payment during construction. Much of the fill material for the Lion Deck area will come from the refuse facilities. Having accurate designs in both areas will help save costs and improve design efficiency. We would suggest that maps used for earthmoving calculations and construction be made at a scale of approximately 1"-40' and at a contour accuracy of at least 2' (the contour intervals could be adjusted to 5' or 10' intervals for mapping clarity in steep areas). Cross sections could be accurately derived from the stereo model and projected much more accurately than by using the contour maps if the locations of the sections were given to the firm used to develop the aerial photos and maps. The costs for aerial photography and mapping would most likely be recovered several times over in improved design and earthmoving construction efficiency.

4. At a minimum, more detailed maps and cross sections through the Lion Deck facilities area will need to be provided to show the location of the county road and the extent of backfilling that is to be accomplished there. The current maps and cross sections do not accurately show the existing or proposed final contours in a sufficiently detailed manner for construction or to adequately demonstrate that the site can be reclaimed. Again, the costs for a conventional survey of this area would nearly equal the costs to have the area re-flown and mapped (another good argument for aerial photography). Cross sections should accurately depict the location of the county road, the solid portion of the bench, the extent of disturbed areas and the natural slopes above and below the disturbed areas to show how the design blends into the natural slopes, and detailed designs for drainage restoration and drainage control along the county road.
5. While demolition and removal within the site could commence immediately, the Division is requesting that any proposed changes to the backfilling and grading plan or drainage design be submitted to the Division as an amendment at least 60 days prior to commencement of any on site earthwork.

A significant portion of the plan, especially regarding the loadout and refuse facilities were revised last year in the plan. These changes made a significant improvement in the overall quality of the reclamation plan. The information provided for Star Point which discussed highwall elimination also helped clarify questions regarding reclamation of the site.

We would also like to personally thank you for accommodating us on our site visit as well as an extended thank you for the help, cooperation and support that you have offered on all the permits for which you are responsible. Your efforts have greatly improved the mining and reclamation plans and your efforts during reclamation work have greatly enhanced overall reclamation success and will make bond release for those areas much quicker and easier.

Johnny Pappas

July 14, 2000

Page 3

Because of the sincere efforts of Plateau Mining Corporation, we feel that improvements to the reclamation plan for the Star Point Mine will be made regardless. We feel that any questions or inadequacies pertaining to the mining and reclamation plan will be alleviated once a detailed plan for reclamation construction is made. If we can be of any assistance or help resolve any questions or issues involving upcoming reclamation work, please don't hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Daron R. Haddock". The signature is fluid and cursive, with the first name "Daron" being the most prominent.

Daron R. Haddock
Permit Supervisor

sm

cc: Price Field Office

O:\007006.STP\FINAL\resurvey.wpd