

0013

**PLATEAU
MINING
CORPORATION**

Willow Creek Mine
847 NW Hwy 191
Helper, Utah 84526
(435) 472-0482
Fax: (435) 472-0486

An affiliate of **RAG**

May 8, 2002

Mr. Daron Haddock
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

OK
J. Young
C/007/006
Response 02B

Re: Lion Deck Modified Reclamation Plan, Plateau Mining Corporation, Star Point Mine, C/007/006-AM02B, Carbon County, Utah

Dear Mr. Haddock:

Plateau Mining Corporation (PMC) is submitting its response to the Division's April 2002 Technical Analysis regarding the aforementioned.

The identified deficiencies are provided below along with PMC's response.

R645-301-542.310, *The Permittee must provide the Division with cross-sections for the Lion Deck area at an average spacing of one cross-section every 200 feet.*

The number of cross-sections has been adjusted accordingly.

With the more advanced software programs today, volumes can be more accurately calculated by the software program than when cross-sections were utilized. Also, the major reason PMC reduced its number of cross-sections is due to the improved topography that utilizes 2 foot contour intervals within the disturbed area. The same 2-foot contour interval will be used for the as-builts. The tighter contour interval will provide the same, if not more information, than will the additional cross-sections for as-built comparison.

R645-301-553.120, -553.350, -610, *The permittee must reclaim the highwall at the Lion Deck area unless they can show that 1) the reclaimed slope will have a static safety factor of less than 1.3 or that there is insufficient material to full reclaim the highwall.*

Cross-section E-E' depicts the area where the pre-SMCRA highwall exists. Limitation to full reclamation of the pre-SMCRA highwall is due mainly to the access road to Gentry Mountain.

RECEIVED

MAY 10 2002

DIVISION OF
OIL, GAS AND MINING

Mr. Daron Haddock
May 8, 2002
Page 2

By placing the access road on a more stable surface, it limits the amount of backfill that can be placed against the cut. Placement of backfill in this area will reach a slope of approximately 1.8:1 at its steepest point against the cutslope.

The backfill material will be coal processing waste which according to Chen and Associates, Exhibit 528.322a, it is recommended that slopes be placed at 2:1. Chen and Associates believe that surficial raveling and shallow slippage would occur on slopes steeper than 1.75:1.

Another limitation to steep slopes is the placement and preparation of growth media. Growth media is to be placed in an uncompacted manner. Due to the looseness of the growth media, the incorporation of hay mulch, and subsequent gouging, the growth media has a tendency to migrate down a steep slope. When this happens, the four-foot veneer of growth media covering the coal processing waste is jeopardized. Furthermore, a 1.8:1 slope is about the steepest that a trackhoe can effectively operate on.

R645-301-553.130, *The Permittee must state what the angle-of-repose is for the backfill material. The Division needs that information to determine what the maximum reclaimed slope angle can be.*

The backfill material will be coal processing waste. Exhibit 528.322a, Chen and Associates, states that the safety factor against a deep-seated failure, was calculated by others to be greater than 1.5 under static conditions for 1.75:1 slope. A safety factor against a shallow (infinite slope) failure, for a 1.75:1 slope was calculated to be on the order of 1.2 under static conditions. Under dynamic conditions, the safety factor for shallow slides was calculated to be less than 1.0. Based on these results, they believe surficial raveling and shallow slippage would occur on slopes steeper than 1.75:1.

Slopes placed at 2:1 are calculated to have a static safety factor from a deep-seated type failure of greater than 1.5. Shallow infinite slope type slope failures were calculated to be approximately 1.4 under static conditions. Under dynamic conditions, a safety factor of 1.1 was calculated for these slopes. Based on these results, the slopes consisting of coal processing waste should be no steeper than 2:1.

As discussed by Rollins, Brown and Gunnell, Exhibit 553.130a, backfill material consisting of sands and gravels can be placed in a relatively uncompacted manner to construct a final slope no steeper than 1.5:1, which is the angle of repose for this type of material.

PMC believes that it is important to minimize the potential for surficial raveling, shallow slippage, erosion and water pollution. The escarpments that will remain would blend with the surrounding escarpments that are typical of the area.

Mr. Daron Haddock
May 8, 2002
Page 3

As discussed on Page 500-77 and -78, cuts will remain where complete backfilling would result in slopes whose steepness would be unstable or where the backfill would impinge upon roads which are to be retained as part of post reclamation land use.

R645-301-553.130, *The Permittee will eliminate or reduce the cut slopes in the Lion Deck area to the extent practical. Cut slopes must be reduced or eliminated where there is sufficient fill material or where the slope angle can be increased. In the approved MRP the Permittee proposed to reduce or eliminate cut slopes with reclaimed slopes with grades of 1.5H to 1 V or greater. In the amendment the Permittee proposes using 2H to 1V slopes. The Permittee must increase either the slope angle or show why the slopes cannot be increased beyond 2H to 1V. The cut slopes need to be eliminated to achieve slope stability and prevent erosion and water pollution.*

PMC proposes to use 2:1 overall slopes where the upper slope angle will be steepest then as the slope progresses towards the County Road it begins to concave towards a flatter slope angle.

Slopes placed at 2:1 are calculated to have a static safety factor from a deep-seated type failure of greater than 1.5. Shallow infinite slope type slope failures were calculated to be approximately 1.4 under static conditions. Under dynamic conditions, a safety factor of 1.1 was calculated for these slopes. Based on these results, the slopes consisting of coal processing waste should be no steeper than 2:1.

As discussed by Rollins, Brown and Gunnell, Exhibit 553.130a, backfill material consisting of sands and gravels can be placed in a relatively uncompacted manner to construct a final slope no steeper than 1.5:1, which is the angle of repose for this type of material.

R645-301-553.140, *The Permittee will show that either the straight reclaimed slopes proposed in the amendment will minimize erosion and water pollution both on or off the site or the Permittee will develop a reclamation plan with concave slopes.*

PMC has redrawn the cross-sections to reflect a concave slope. PMC has always made every effort to reclaim using concave slopes. The Reclamation Bid Package specifies that all reclaimed slopes will be concave in shape and in cross section.

When considering sediment yield potential, sediment yield increases dramatically with slope. Therefore, slope angles designed to minimize sediment yield may conflict with maximizing cutslope reclamation. The ideal reclamation plan is one that maximizes backfilling of cutslopes yet minimizes sediment yield from the reclaimed slopes. This is what the Division will find in our reclamation plan.

Mr. Daron Haddock
May 8, 2002
Page 4

R645-301-553.300, *The Permittee must show the location of coal seams in the cross-sections. The Division needs this information to make a finding about whether or not coal seams have been adequately covered.*

The coal seam is shown on the appropriate cross-sections. The Division will find that the coal seam is adequately covered.

Hopefully, PMC has adequately addressed the Division's findings, but should the Division have any questions or need additional information, please do not hesitate to contact me and (435) 472-4741.

Sincerely,



Johnny Pappas
Sr. Environmental Engineer

Enclosures

APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: C/007/006
Title of Proposal: Lion Deck Reclamation Plan Improvement, Response to April 2002 Technical Analysis						Mine: STAR POINT MINES
						Permittee: PLATEAU MINING CORP.

Description, include reason for application and timing required to implement:

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV # _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

Attach 3 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

John Pappas - Sr. Env. Engineer - 5/8/02
 Signed - Name - Position - Date

Subscribed and sworn to before me this 5th day of May, 2002.

Wilma Howa
 Notary Public

My Commission Expires: _____
 Attest: STATE OF _____
 COUNTY OF Carbon



NOTARY PUBLIC
 WILMA HOWA
 70 South Main
 Helper, Utah 84526
 My Commission Expires
 September 05, 2004
 STATE OF UTAH

Received by Oil, Gas & Mining

RECEIVED

MAY 10 2002

DIVISION OF
 OIL, GAS AND MINING

ASSIGNED TRACKING NUMBER

