

June 6, 2003

Johnny Pappas, Sr. Environmental Engineer  
Plateau Mining Corporation  
P.O. Box 30  
Helper, Utah 84526-0030

Re: Conditional Approval of Discontinue Subsidence Monitoring, Plateau Mining Corporation, Star Point Mine, C/007/006-AM03B, Outgoing File

Dear Mr. Pappas:

The above-referenced amendment is conditionally approved upon receipt of seven clean copies prepared for incorporation. Please submit these copies by July 5, 2003. Once we receive these copies, final approval will be granted, at which time you may proceed with your plans.

A stamped incorporated copy of the approved plans will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed.

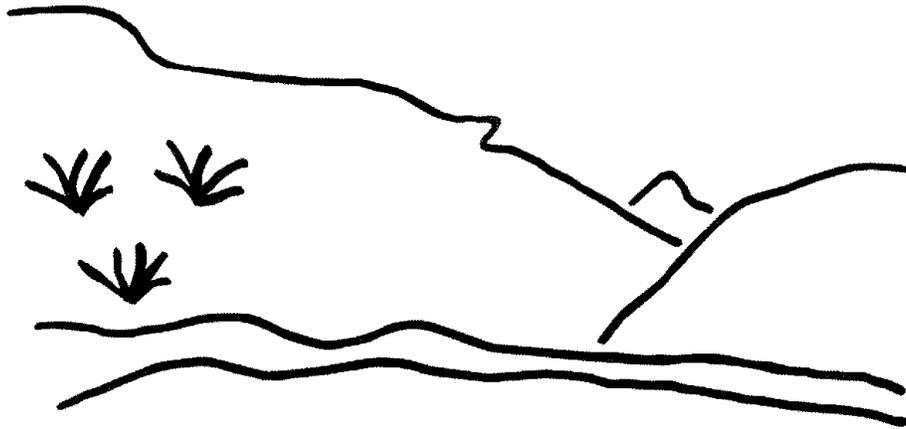
If you have any questions, please call me at (801) 538-5268 or Wayne Western at (801) 538-5263.

Sincerely,

Pamela Grubaugh-Littig  
Permit Supervisor

an  
Enclosure  
cc: Price Field Office  
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# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Star Point Mine  
Discontinue Subsidence Monitoring  
C/007/006-AM03B  
Technical Analysis  
June 4, 2003



## TECHNICAL ANALYSIS

The Division ensures compliance with the Surface Mining Control and Reclamation Act of 1977(SMCRA). When mines submit a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings, which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

Often the first technical review of an application finds that the application contains some deficiencies. The deficiencies are discussed in the body of the TA and are identified by a regulatory reference, which describes the minimum requirements. In this Technical Analysis we have summarized the deficiencies at the beginning of the document to aid in responding to them. Once all of the deficiencies have been adequately addressed, the TA will be considered final for the permitting action.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.



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**INTRODUCTION**

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On April 23, 2003, the Division received amendment AM03B for the Star Point Mine. The amendment is a request for ceasing the subsidence-monitoring program. The reasons for ceasing the program are there has been no impact to surface or ground water and the area is stable. Therefore, additional subsidence monitoring is unnecessary.



## OPERATION PLAN

### SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

#### **Analysis:**

##### **Subsidence Control Plan**

The Division reviewed the Exhibit 728h, Appendix D, which shows the subsidence monitoring data from 1991 through 2002. The data shows no significant changes in elevation change that can be contributed to subsidence. There are some anomalies in the data that the Permittee explains by in house survey errors.

In 2002, the Permittee did find some subsidence cracks. The Division examined the cracks but could not determine when the cracks occurred. The Division usually assumes that 90% of all subsidence from longwall operations will occur with six months of mine. Based on the data in Appendix D the Division has no reason to make another conclusion.

On March 22, 2002, the Division approved an amendment to reduce water monitoring after the Division found water quality to be stable over time. The site appears to be stable and subsidence-monitoring requirements can be eliminated.

#### **Findings:**

The Permittee has met the minimum requirements of this section of the regulations.