

MICHAEL O. LEAVITT
Governor

OLENE S. WALKER
Lieutenant Governor

October 7, 2003

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

Subject: Conditional Approval of Discontinuance of Vegetation Monitoring,
Plateau Mining Corporation, Star Point Mine, C/007/0006, Task ID #1618,
Outgoing File

Dear Mr. Pappas:

The above-referenced amendment is conditionally approved upon receipt of seven clean copies for incorporation. Once we receive these copies, we will send a stamped incorporated copy to you for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed for your information.

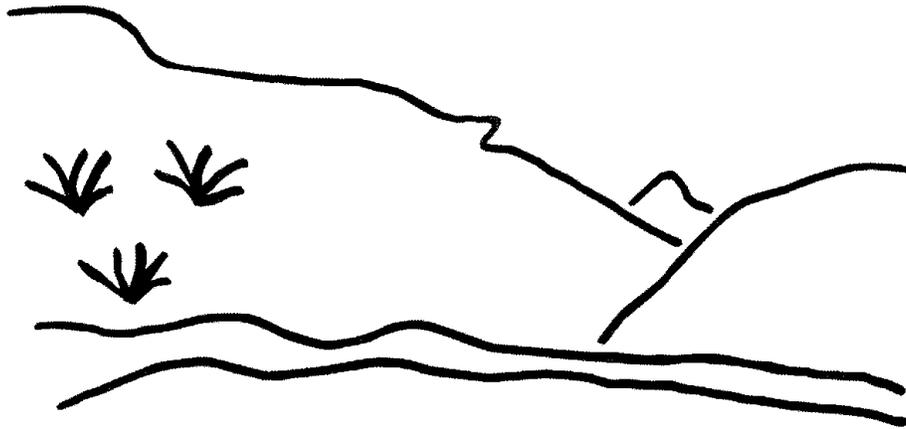
If you have any questions, please call me at (801) 538-5268 or Karl R. Houskeeper at (435) 613-5330.

Sincerely,

Pamela Grubaugh-Littig, Permit Supervisor
Coal Program
Utah Division of Oil, Gas & Mining

KRH/sd
Enclosure
cc: Price Field Office
O:\007006.STP\FINAL\CONDAPP_1618.DOC

State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Star Point Mine
Discontinuance of Vegetation Monitoring
C/007006
Task ID #1618
Technical Analysis
August 11, 2003

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TECHNICAL ANALYSIS

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The Division regulates 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.

INTRODUCTION

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The Division received an amendment on June 27, 2003 to address the discontinuance of any future vegetation infrared-image monitoring at the Star Point Mine. Patrick Collins of Mt. Nebo Scientific, Inc. analyzed the images from the infrared monitoring done in 1980, 1993, and 1998. The results showed there were no significant changes in vegetation imagery among the three years. Dr. Collins summarized that mining operations of the Star Point Mine have not significantly affected the vegetation. The 1998 annual report provides Dr. Collins' analysis and discussion of the vegetation-imagery evaluation.

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INTRODUCTION

RECLAMATION PLAN

RECLAMATION PLAN

REVEGETATION

Regulatory Reference: 30 CFR Sec. 785.18, 817.111, 817.113, 817.114, 817.116; R645-301-244, -301-353, -301-354, -301-355, -301-356, -302-280, -302-281, -302-282, -302-283, -302-284.

Analysis:

Revegetation: Standards For Success

The Permittee is required to monitor the effects of mining subsidence on vegetation. Monitoring includes the application of infrared imaging of the area. Patrick Collins of Mt. Nebo Scientific, Inc. analyzed the images from years 1980, 1993, and 1998. The results showed there were no significant changes in vegetation imagery among the three years. Dr. Collins summarized that mining operations of the Star Point Mine have not significantly affected the vegetation. The 1998 annual report provides Dr. Collins' analysis and discussion of the vegetation-imagery evaluation.

In 2002, the Permittee found 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 occurs within six months of initial mine operations. Based on the data in Appendix D of the MRP, the Division has no reason to make another conclusion. Because the Division previously approved amendments to discontinue subsidence monitoring and the site appears stable, the Permittee may cease subsidence monitoring of vegetation.

For the record, Star Point Mine ceased mining operations in February 2000. The Star Point Mine is currently in the process of transferring the refuse pile and topsoil borrow area to Sunnyside Cogeneration Associates (SCA). Plateau Mining Corporation indicates that it will not conduct reclamation activities on those two areas. SCA will assume responsibility for two disturbed areas as described in their new permit.

Findings:

Information provided in the application is considered adequate to meet the minimum Revegetation Standards for Success section of the Reclamation regulations.