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

PRO/007/038  
#2

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June 6, 1995

TO: Daron Haddock, Permit Supervisor  
FROM: Paul Baker, Reclamation Biologist  
RE: Draft Preliminary Administrative Completeness Review, Willow Creek Mine, Cyprus Plateau Mining Company, PRO/007/038, Working File, Carbon County, Utah

PRB

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**SYNOPSIS**

On May 3, 1995, the Division received a proposed mining and reclamation plan for the Willow Creek Mine. The letter accompanying the application says the Willow Creek Mine is intended to replace the Star Point Mine as reserves are depleted from Star Point. Manpower will be transferred from Star Point to Willow Creek. Cyprus and Division personnel have met several times and have established a review schedule.

In keeping with the review schedule, the Division was to have completed an administrative completeness review by June 5, 1995. Portions of the general contents, biology, and land use chapters have been reviewed, and there are major and some lesser gaps. These are discussed below. It is impossible to make a thorough review of some sections because related sections are missing.

There are, undoubtedly, other completeness issues not identified in this memorandum. Before doing a thorough administrative completeness review, the Division needs to have an application that Cyprus, at least, considers complete.

**ANALYSIS**

The following administrative completeness items were identified in a preliminary review of the Willow Creek Mine application. The review was not thorough.

1. The application does not list officers and directors of Cyprus Amax Minerals Company or Amax Energy Company.
2. Map 1, showing surface land ownership, conflicts in several ways with information in the text.
3. The right of entry information appears to have some mistakes. For example, the



surface lease for the preparation plant area is from Amax Coal Co. rather than Castle Gate Coal Co. Right of entry information was not thoroughly reviewed.

4. There is no insurance certificate.
5. Baseline vegetation information in the application can probably be considered administratively complete, but additional information is needed. This has been discussed with the applicant and its consultants. A revegetation plan with proposed standards for success is needed before determining baseline information complete.
6. The application includes no revegetation plan whatsoever. This includes both the interim and final revegetation plan.
7. There is no postmining land use plan.
8. The application contains cultural and archaeological resources information and describes coordination efforts with SHPO. The application says Cyprus met with SHPO to review cultural resource considerations and potential mitigation requirements and that the results of this meeting and subsequent discussions were incorporated into the mining and reclamation planning process. However the application does not describe how or whether cultural resources will be protected. Also, this information needs to be considered confidential; it cannot be included in public review copies.

## **RECOMMENDATIONS**

In keeping with the schedule upon which the Division and Cyprus have agreed, the Division should inform Cyprus that its application is incomplete. After Cyprus has made a submittal that it considers complete, the Division needs to conduct a thorough administrative completeness review.