



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

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April 24, 1997

Johnny Pappas, Sr Environmental Engineer
Cyprus-Plateau Mining
P.O. Drawer PMC
Price, Utah 84501

RE: Willow Creek Separation, Cyprus-Plateau Mining Corporation, Willow Creek Mine, ACT/007/038-96F, File #2, Carbon County, Utah

Dear Mr. Pappas:

Reclamation Specialists Paul Baker and Steve Johnson have reviewed the referenced amendment noting the following deficiencies:

R645-301-100, the applicant has included in the application a proposal to drill several degasification wells in the Bear Canyon Area. These wells would be outside the current Willow Creek permit area, and this proposal would need to be processed as an incidental boundary change. If this is applicants intention, the applicant needs to include all pertinent land ownership, right of entry, and baseline information necessary to permit the sites.

R645-301-341, while the plan does show where the seed mixes would be used, the Division makes the following suggestions to simplify the plan: 1) Eliminate species 4 from chapter 9, keep the interim mix from the Willow Creek plan. 2) Eliminates species list 1 from chapter 9 and specify that the upland seed mixture in the existing Willow Creek Plan will be used to revegetate the Castle Gate Preparation Plant, Gravel Canyon, And Willow Creek Mine Areas. 3) Make the following changes to upland seed mixture for Willow Creek (Table 5.3-2): a) Substitute Blue bunch Wheat Grass (*Elymus spicatus*) for Salina Wild Rye. b) Add winter fat (*Ceratoides lanata*) to the list of shrubs to be planted. Winter Fat Seed should be broadcast seeded and the recommended rate is 2 pounds per acre. 4) Section 3.7 says species list 5 will be used within 20 feet of certain reclaimed channels, and section 3.4-4 says species list 3 will be used along the Price River. Since list 3 and 5 are identical one of these could be eliminated, but the reference in either section 3.7 or 3.4 would have to be change accordingly.

If Cyprus chooses to follow these suggestions and eliminate species list 1, they

Separation Project
ACT/007/038-96F
April 24, 1997
Page 2

may want to renumber species list 2, 3, and potentially 4 & 5. Also, chapter 9 discusses using certain species lists for wildlife areas, but does not show where these wildlife areas are. This commitment could probably just be eliminated.

The seeding and mulching methods discussed in the main part of the Willow Creek Plan and in Chapter 9 in the Castle Gate Plan are generally compatible, but one difference should be corrected. Chapter 9 says a broadcast seeder will be used for small or fluffy seeds in combination with drill seeding. The main part of the Willow Creek Plan only says that small seed would be drilled. It would be much better to use the combination of seeding methods.

R645-301-341, in those areas that would be drill seeded the applicant needs to broadcast seeds of small or fluffy seeded species.

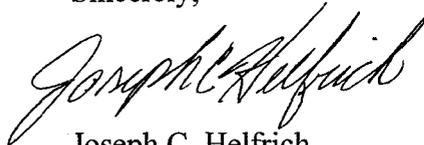
R645-301-112, the applicant needs to clearly define the pre- and post-mining land use for all areas of the mine. The uses need to be consistent with the information presented in chapter 4.

R645-301-510, information on injection wells must be properly referred to into the discharge information section.

R645-301-742.220, pond 12-B must have one standard design in all exhibits.

Please respond to these deficiencies by no later than May 22, 1997. If you have any questions please call.

Sincerely,



Joseph C. Helfrich
Permit Supervisor

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cc: Pete Hess. PFO
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