



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

INSPECTION REPORT

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Michael O. Leavitt
Governor
Lowell P. Braxton
Division Director

Partial: XXX Complete: Exploration:
Inspection Date & Time: 2/12/99 / 8:30a.m.-2:30p.m.
Date of Last Inspection: 1/11/99

Mine Name: Willow Creek Mine County: Carbon Permit Number: ACT/0007/038
Permittee and/or Operator's Name: Cyprus Plateau Mining Corporation
Business Address: 847 Northwest Highway 191, Helper, Utah 84526
Type of Mining Activity: Underground XXX Surface Prep. Plant Other
Company Official(s): Vicky Miller, Earthfax, Permittee Rep
State Officials(s): Peter Hess Federal Official(s): None
Weather Conditions: Sunny, 40's
Existing Acreage: Permitted- 14,670 Disturbed- 206.7 Regraded- Seeded- Bonded- 206.7
Increased/Decreased: Permitted- Disturbed- Regraded- Seeded- Bonded-
Status: Exploration/ XXX Active/ Inactive/ Temporary Cessation/ Bond Forfeiture
Reclamation (Phase I/ Phase II/ Final Bond Release/ Liability Year)

REVIEW OF PERMIT, PERFORMANCE STANDARDS & PERMIT CONDITION REQUIREMENTS

Instructions

- Substantiate the elements on this inspection by checking the appropriate performance standard.
 - For **complete inspections** provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check N/A.
 - For **partial inspections** check only the elements evaluated.
- Document any noncompliance situation by referencing the NOV issued at the appropriate performance standard listed below.
- Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
- Provide a brief status report for all pending enforcement actions, permit conditions, Division Orders, and amendments.

	EVALUATED	N/A	COMMENTS	NOV/ENF
1. PERMITS, CHANGE, TRANSFER, RENEWAL, SALE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. SIGNS AND MARKERS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. TOPSOIL	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. HYDROLOGIC BALANCE:				
a. DIVERSIONS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. SEDIMENT PONDS AND IMPOUNDMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. OTHER SEDIMENT CONTROL MEASURES	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. WATER MONITORING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. EFFLUENT LIMITATIONS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. EXPLOSIVES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. DISPOSAL OF EXCESS SPOIL/FILLS/BENCHES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. COAL MINE WASTE/REFUSE PILES/IMPOUNDMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. NONCOAL WASTE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-Empty lubricant barrels and other trash on coal stockpile pad.				
9. PROTECTION OF FISH, WILDLIFE AND RELATED ENVIRONMENTAL VALUES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. SLIDES AND OTHER DAMAGE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. CONTEMPORANEOUS RECLAMATION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. BACKFILLING AND GRADING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. REVEGETATION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. SUBSIDENCE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. CESSATION OF OPERATIONS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. ROADS:				
a. CONSTRUCTION/MAINTENANCE/SURFACING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. DRAINAGE CONTROLS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. OTHER TRANSPORTATION FACILITIES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. SUPPORT FACILITIES/UTILITY INSTALLATIONS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS CHECK (4th Quarter-April, May, June) _____ (date)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. AIR QUALITY PERMIT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. BONDING & INSURANCE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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(Continuation sheet)

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PERMIT NUMBER: ACT/007/038

DATE OF INSPECTION: 2/12/99

(Comments are Numbered to Correspond with Topics Listed Above)

Note: Based on a February 2, 1999 newspaper article from the Sun Advocate, the permittee anticipates resuming coal production from the continuous miner sections by no later than the end of March.

1. PERMITS, CHANGE, TRANSFER, RENEWAL, SALE

Johnny Pappas and Vicky Miller, Earthfax Engineering, met with Ms. Sharon Falvey, Reclamation Hydrologist, and myself this day to review and determine differences between the "approved" designs and the "as built" drawings which have been submitted as part of ACT/007/038-98G. Ms. Falvey has expressed the concern that the implemented field designs relative to hydrologic issues may need a complete re-review to determine the adequacy of the designs. The construction schedule implemented during the building of the Willow Creek Mine did not allow for the times necessary to review as part of the MRP amendment process the individual field changes implemented. The comparison of the two sets of maps mentioned above is indicative that many are substandard relative to consistency of information on overlapping sections, consistency of the approved plan with the "as built" conditions, and consistency with "as built" drawings versus actual field conditions. As example, several hydrology maps show riprapped energy dissipators (plunge pools) on the drawing, where actual field conditions are merely a large riprap field in a drainage confluence without a plunge area. There have also been changes made in watershed areas; Ms. Falvey expressed a concern about proper curve numbers, which are critical to adequate hydrologic designs.

Ms. Vicky Miller and Ms. Falvey have worked out the following plan of attack. Ms. Miller will determine:

- 1) What field conditions coordinate with approved MRP designs.
- 2) What field conditions are in place without "approved" designs, and if designs exist for same.
- 3) What designs must be reviewed by Ms. Falvey in order to bring the plan into compliance.
- 4) Earthfax will determine if, as example, a diversion must have seven different designations; Mr. Pappas has instructed Earthfax to come up with a diversion specification chart for all drainages at the site. I have asked that the MRP be made as "inspector friendly" as possible. Mr. Pappas is in agreement with this.

A field inspection of numerous diversions this day revealed that the "as-built" drawings are relatively accurate, with only minor discrepancies, as noted above, existing. Ms. Vicky Miller will "field truth" the remaining portions of the disturbed area at both the wash plant and the mine site as part of the re-submittal process. Assistance from the PFO has been offered in order to help expedite the clarification, compilation, and re-submittal process. The permittee is actively pursuing, through Earthfax, an accurate MRP, from which the site can be inspected, and maintained according to the requirements of the R645 rules.

In addition to the hydrologic designs which must be determined and approved, the following issues need to be permitted with the "as-built" re-submittal:

- 1) The pump station, its associated access road, and plumbing are major components of the methane degasification program which has been implemented at the Mine site since the November fire. These items are located adjacent to and SW of the run-of-mine coal storage area and need to be addressed in the text and on the surface facilities map.
- 2) The temporary waste rock storage pile location outby the main intake Mine portal needs to be put on the surface facilities map.

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- 3) The status of several of the boreholes which were drilled during the emergency to determine mine atmospheric levels may or may not be needed. The permittee and MSHA may want to retain several of these for reason of convenience, once mining is reinitiated. Hopefully, a solution to controlling the combustible vapors which are generated by the hydrocarbons, and the methane which is inherent in the coal will have been made, and these problems will be controllable upon re-initiation of mining. Should this be the case, the emergency holes and their associated access roads can be reclaimed. If the holes are to be retained, Mr. Pappas was instructed to permit them. All boreholes are located on-ground which is either owned by Cyprus Plateau Mining Corporation or the BLM.

2. SIGNS AND MARKERS - (R645-301-521.250. Perimeter Markers)

The disturbed area boundary which is adjacent to and immediately NW of the Utah Power and Light Carbon Plant raw coal storage pile needs additional delineation. This was mentioned to Ms. Vicky Miller of Earthfax Engineering. This must be done in coordination with the Power Company, as the boundary is obviously shared by both entities.

The permittee should confirm that all disturbed area perimeter boundaries, as they relate to surface facilities and other maps, are accurate.

4A. HYDROLOGIC BALANCE: DIVERSIONS

Tumbleweeds were observed obstructing two diversion inlets associated with the undisturbed drainage above the highwall/mine portal area.

4C. HYDROLOGIC BALANCE: OTHER SEDIMENT CONTROL MEASURES

Drainage diversions were blocked in two locations with stockpiled snow. Both locations were on the south side of the surface shop/administration building area. Mr. Pappas was informed that a blocked diversion constitutes a compliance issue.

It was suggested to Mr. Pappas that snow storage areas be permitted for the site. Mr. Pappas will inform surface personnel about blocking ditches during snow removal.

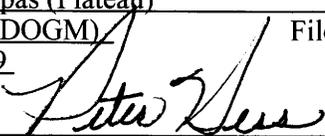
8. NONCOAL WASTE

Two empty 55 gallon lubricant containers having the bungs removed were observed on the run-of-mine coal storage pad; one was lying on its side. Other assorted articles of noncoal waste were seen in this area, i.e., a filter, hosing, and some brattice. The area needs to be picked up.

Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas, and Mining.

Copy of this Report:

Mailed to: Johnny Pappas (Plateau) Henry Austin (OSM)
Given to: Joe Helfrich (DOGM) Filed to: Price Field Office
Date: February 18, 1999

Inspector's Signature:  #46
Peter Hess