



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

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May 18, 1999

TO: File

THRU: Daron Haddock, Permit Supervisor *DH*

FROM: Paul Baker, Reclamation Biologist *PB*

RE: Willow Creek As-Built, Cyprus Plateau Mining Corporation, Willow Creek Mine, ACT/007/038-98G, Folder #2, Carbon County, Utah

SUMMARY:

Cyprus Plateau Mining Corporation submitted as-built maps for the Willow Creek Mine on September 29, 1998. Revised maps with several text changes were received April 30, 1999. These maps and text changes are needed to accurately show the permit area boundary, the disturbed area boundary, contours of the facilities area, and to reflect changes in the operations.

This review considers the major changes to the plan but is not a complete technical analysis.

ANALYSIS:

ADMINISTRATIVE INFORMATION

RIGHT OF ENTRY

Regulatory Reference: R645-301-114

Analysis:

Some of the right of entry information has been updated. Included in the updates is information about federal lease UTU-73975, dated February 1, 1997. It appears the information in the application is complete and accurate.

Findings:

Information provided in the application is considered adequate to meet the requirements

Willow Creek As-Built
ACT/007/038-98G
May 18, 1999
Page 2

of this section of the regulations.

ENVIRONMENTAL RESOURCE INFORMATION

VEGETATION RESOURCE INFORMATION

Regulatory Reference: R645-301-321

Analysis:

Changes have been made to Table 3.2-2, but this table is not clear. The total disturbed area acreage, 55.57 acres, appears to be correct. However, it is uncertain how acreage figure for previous disturbance areas, 45.23 acres, relates to the acreage figures for "Previously Disturbed--Unreclaimed" and "AML Reclamation" areas at the bottom of the table, 63.9 acres. These two figures should probably be the same. The applicant needs to explain these differences and reconcile them.

Findings:

Information provided in the proposal is not considered adequate to meet the requirements of this section of the regulations. Prior to final approval, the applicant must supply the following in accordance with:

R645-301-321, It is unclear why the acreage figures in Table 3.2-2 do not match, and the application needs to either explain the differences or reconcile the figures.

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: R645-301-411. R645-301-323

Analysis:

Cultural Resource Maps

Map 11 is a map of cultural resources in the area of the mine. Included are several historic and prehistoric sites and paleontological resources. This map has been in the confidential file and needs to remain there.

The new map has updated disturbed area information, but the baseline information has not changed. Contours are those that existed prior to construction. The map can be approved as submitted, but it needs to be in the confidential file.

Vegetation Reference Area and Wildlife Maps

The applicant has chosen to include maps of the proposed Barn Canyon shaft facility. Figure 3.2-1 is a map showing vegetation communities in the area, and it can be approved.

Map 5 shows vegetation in the region, including two reference areas near the Castle Gate Preparation Plant and two near the Willow Creek Mine. The reference area in Dry Canyon is not part of the revegetation success standards, but it is understood from the applicant that it may be needed in the future. Three reference areas in Crandall Canyon are shown on other maps in the mining and reclamation plan.

The reference area shown on Maps 5 and 6 as being northeast of Eagle Canyon is actually in Eagle Canyon. These maps should show the location more accurately. The other reference areas shown on Maps 5 and 6 are in approximately the right locations. However, it should be possible to show the locations of these reference areas more precisely.

There are two other problems with Map 6 that should be corrected. The legend indicates the disturbed area boundary is marked by a solid black line, but the boundary on the map is shown by a line with two dashes. Also, this map shows the location of the lower section of Willow Creek that was relocated, but it does not show the upper section. Since this map shows premining baseline information, it would probably be best to not show the new location of Willow Creek. The location is shown on other maps.

The design of the original vegetation sampling was based on whether the site was previously disturbed, and the vegetation cover success standard is a weighted average of cover in areas previously disturbed and not previously disturbed by mining. Therefore, when sampling for revegetation success, it will be important to know exactly where the boundaries are. This information is clearly shown on Map 6 submitted with this amendment, and it is important that this information be retained in any future revisions to this map.

The Regional Wildlife Map, Map 7, has been revised to include boundaries of the current permit area and recent raptor survey information. It shows eight golden eagle nests near the surface facilities and three other raptor nests in the permit area. The map is clear and of good quality and will be useful in determining potential effects on wildlife.

Map 8 shows where biological surveys were taken in and near Willow Creek. It shows the locations of fish and macroinvertebrate sample sites, including those samples that were taken in Willow Creek before it was relocated. This map can be approved.

Willow Creek As-Builts

ACT/007/038-98G

May 18, 1999

Page 4

Findings:

Information provided in the proposal does not meet the requirements of this section of the regulations. Prior to approval, the applicant must supply the following in accordance with:

R645-301-121.200 and R645-301-140, Maps 5 and 6 need to be revised to show the correct location of the pinyon juniper reference area in Eagle Canyon. Although the maps show the approximate locations of two other reference areas in the area, it should be possible to show the locations more precisely. The legend on Map 6 has a different symbol for the disturbed area boundary than the map itself, and the map only shows one of the relocated sections of Willow Creek. Since the map shows baseline information before the creek was relocated, it would probably be best to not show the relocated sections at all.

RECOMMENDATIONS:

The proposal should not be approved until the problems discussed in this memorandum have been rectified.