



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

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September 7, 1999

TO: File

THRU: Pete Hess, Project Lead *psl for Pete Hess*

THRU: Daron Haddock, Permit Supervisor *DH*

FROM: Paul Baker, Reclamation Biologist *PB*

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

SUMMARY:

Plateau Mining Corporation submitted as-built maps for the Willow Creek Mine on September 29, 1998. The Division received revised maps with several text changes on April 30, 1999, and additional changes on August 3, 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 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 the 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 be the same. The applicant needs to reconcile or explain the differences.

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 reconcile the figures or explain the differences.

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.

Map 6 shows vegetation communities and sampling sites in and near the mine and preparation plant. It also shows in more detail the locations of three reference areas. In a 1999 site visit, representatives of the Division and the applicant were not able to find two of the posts marking the grass/sage reference area or any of the markers for the mixed brush reference area. While it appears the map is properly marked according to previously-approved maps, these reference areas still need to be marked in the field.

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 these boundaries 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.

Findings:

Information provided in the proposal is considered adequate to meet the requirements of this section of the regulations.

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RECOMMENDATIONS:

The Division should not give final approval until the problems discussed in this memorandum have been rectified.

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