



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

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November 4, 1999

Johnny Pappas, Sr. Environmental Engineer  
Plateau Mining Corporation  
Willow Creek Mine  
847 Northwest Highway 191  
Helper, Utah 84526

Re: Completion of Midterm Review, Plateau Mining Corporation, Willow Creek Mine,  
ACT/007/038-MT99, File #2, Carbon County, Utah

Dear Mr. Pappas:

The Division has completed the midterm review of the Willow Creek Mine. The items which were reviewed were identified in our September 9, 1999 letter to you and the results are listed below.

1. An AVS check was conducted and returned with a system recommendation of "Issue". There are no NOV's or CO's which are not corrected for the Willow Creek Mine. There are no finalized civil penalties which are outstanding or overdue in the name of Plateau Mining Corporation. Plateau Mining Corporation does not have a demonstrated pattern of willful violations, nor have they been subject to any bond forfeitures for any operation in the state of Utah.
2. There are no outstanding Division Orders at the Willow Creek Mine. A review of plan changes has indicated that there are two pending issues that require a response from Plateau Mining Corporation. Amendment 98G which involves updating the as-builts for the mine, requires a submittal by November 15, 1999 and Amendment 99E which approved resource recovery at Schoolhouse Canyon, requires clean copies to be submitted by November 10, 1999.
3. A review of the applicable portions of the MRP has found that the plan primarily provides sedimentation ponds for Best Technology Currently Available (BTCA) treatment of disturbed areas. Other Alternative Sediment Control Measures (ASCM) are used on site in small areas that cannot drain to the ponds. The review of amendment 98G (As-built updates) has determined that Plateau Mining Corporation has provided for application of

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BTCA to prevent additional contributions of suspended solids to stream flow outside the permit area.

4. A technical site visit was not conducted. However, a review of recent inspection reports completed by the compliance inspector, indicates that the mine is in compliance with the performance standards set forth in the R645 rules and the coal regulatory program.
5. The reclamation bond was evaluated and was found to be adequate. No adjustment will be needed at this time. It should be noted that the Division's actual calculated cost for reclamation did increase from \$11,949,205 to \$12,238,000 due to changes in the inflation rate, but since the change is less than 5% the Division does not require a change in the bond.

This concludes the midterm review of the Willow Creek Mine. Thank you for your cooperation during the review.

Please call if you have any questions.

Sincerely,



Daron R. Haddock  
Permit Supervisor

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cc: Price Field Office  
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