

0027

RECEIVED

PLATEAU  
MINING  
CORPORATION

JUN 26 2000

DIVISION OF  
OIL, GAS AND MINING

Willow Creek Mine  
847 NW Hwy 191  
Helper, Utah 84526  
(435) 472-0475  
Fax: (435) 472-4780

An affiliate of



June 23, 2000

copy Pam

Ms. Pamela Grubaugh-Littig  
Utah Division of Oil, Gas and Mining  
1594 West North Temple, STE. 1210  
P.O. Box 145801  
Salt Lake City, Utah 84114-5801

RE: Findings for Slope Stability and Coal Waste Delineation for Pond 001, Plateau Mining Corporation, Willow Creek Mine, ACT/007/038-AM00A, Carbon County, Utah

Incoming

Dear Ms. Littig:

Plateau Mining Corporation (PMC) is with this letter, addressing the remaining deficiency regarding the final disposition of coal waste in a controlled manner to meet reclamation and revegetation standards/approved post mining land use within Pond 001 embankment.

As identified in the Slope Stability and Coal Waste Delineation for Pond 001 ("Report"), coal waste was identified within the embankment and the appropriate stability analyses were performed to determine the stability of the embankment. Coal waste and a mixture of coal waste and soil was identified and mapped so that the appropriate analyses, drawings and cross-sections could be generated.

Based on the field investigation and cross-sections provided in the Report, the coal waste is covered by at least 3 feet of soil material. The coal waste located in the embankment was placed there pre-SMCRA and was initially covered by the Division of Oil, Gas and Mining during the AML reclamation work performed in the area.

The Permittee acknowledges that the reclamation criteria between Title IV and Title V are different, but the criteria for small localized coal waste pockets encountered during reclamation does not require them to be hauled to a refuse pile for final disposition. It is PMC's intent to haul back from the School House refuse pile enough coal waste to backfill the Willow Creek Mine portal highwall and will utilize additional material from the School House refuse pile as backfill throughout the Willow Creek Mine in order to achieve AOC requirements.

The regulations require that coal waste be covered with the best available nontoxic and noncombustible material that will promote a vegetative cover that is diverse, effective and permanent.

Ms. Grubaugh-Littig  
June 23, 2000  
Page 2

The Willow Creek Stream channel is designed to be a permanent feature, whereby the channel will not be redisturbed during reclamation activities. Additionally, Pond 001 will eventually be backfilled, resloped and seeded during final reclamation. During this procedure, additional growth media will be placed on the embankment whereby the coal waste is covered further with soil material.

The secret to achieving revegetation success on coal waste is not the location of the coal waste, but the amount and quality of the soil material covering the coal waste. Presently, there is a minimum of 3 feet of soil material over the coal waste, with additional material to be placed over it during reclamation.

PMC believes that the best place for the isolated pocket of coal waste within the Willow Creek stream channel and Pond 001 embankment is where it is and that removal of this non-acid and/ or - toxic coal waste will not enhance revegetation success. Furthermore, as part of the Corp of Engineers Stream Channel Relocation Permit, it is PMC's responsibility to reestablished vegetation that meets DOGM performance standards.

Vegetation success within the area of the coal waste will be achieved long before reclamation commences at the Willow Creek Mine. If success is not achieved, then by Permit, PMC must take the required measures to ensure revegetation success.

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



Johnny Pappas  
Sr. Environmental Engineer