



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

Michael O. Leavitt  
Governor  
Kathleen Clarke  
Executive Director  
Lowell P. Braxton  
Division Director

1594 West North Temple, Suite 1210  
PO Box 145801  
Salt Lake City, Utah 84114-5801  
801-538-5340  
801-359-3940 (Fax)  
801-538-7223 (TDD)

May 25, 2000

Johnny Pappas, Sr. Environmental Engineer  
Plateau Mining Corporation  
847 NW Hwy 191  
Helper, Utah 84526

Re: Approval of Inspection Interval - MSHA Pond #13, Plateau Mining Corporation, Willow Creek Mine, ACT/007/038-AM00G, Outgoing File

Dear Mr. Pappas:

The above-referenced amendment is hereby approved effective, May 25, 2000. A stamped approved copy is enclosed for incorporation into your Mining and Reclamation Plan.

If you have any question, please feel free to call me.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Grubaugh-Littig".

Pamela Grubaugh-Littig  
Permit Supervisor

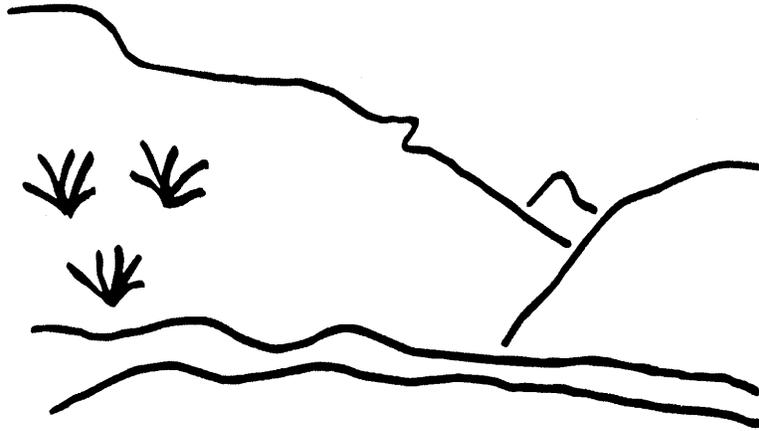
sd/sm

Enclosure:

cc: Joe Wilcox, OSM, Denver  
Richard Manus, BLM, Price  
Mark Page, Water Rights, Price, w/o enc  
Dave Ariotti, DEQ, Price, w/o enc  
Derris Jones, DWR, Price, w/o enc  
David Terry, SITLA, SLC, w/o enc  
Price Field Office

O:\007038.WIL\FINAL\apprAM00G.wpd

# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Willow Creek Mine  
Inspection Interval - MSHA Pond #13  
ACT/007/038-AM00G  
Technical Analysis  
May 24, 2000

## OPERATION PLAN

# OPERATION PLAN

## HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

### Analysis:

#### Impoundments

R645-301-514.320 requires that impoundments subject to MSHA, 30 CFR 77.216 must be examined in accordance with 30 CFR 77.216-3.

The design of pond 013A (School House Canyon coarse refuse toe pond) meets the requirements of 30 CFR 77.216, thereby classifying it as an "MSHA" pond. Prior to Plateau obtaining an inspection frequency variance, pond 013A was inspected on a weekly basis.

30 CFR 77.216-3 (a)(3) indicates that "Longer inspection or monitoring intervals approved under this paragraph (a) shall be justified by the operator based on the hazard potential and performance of the impounding structure, and shall include a requirement for inspection immediately after a specified rain event approved by the District Manager. The April 18, 2000 letter from MSHA relative to the renewal of the 30 day inspection interval variance indicates that upon the site receiving one inch of rainfall over a six hour period, an immediate inspection of pond 013A shall be conducted.

Other stipulations which pertain to retaining this decreased inspection frequency include:

- 1) immediate inspection upon noted unusual conditions of the impoundment.
- 2) immediate inspection of the facility following a seismic event.
- 3) monitoring of water depth and available freeboard on inspection reports.
- 4) daily monitoring of measurable rainfall.

The permittee has been conscientious about performing these requirements in the past, and continues to do so.

Since a reduction in inspection frequency not to exceed once every thirty days has been granted by MSHA, the requirement of R645-301-514.320 can also be reduced such that the one monthly inspection can meet the requirements of both 30 CFR 77.216-3 and R645-301-514.320.

### Findings:

No changes have been necessitated to the Willow Creek Mine mining and reclamation plan. Amendment AM00G should be approved as submitted.