

# PLATEAU MINING CORPORATION

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

An affiliate of **RAG**

October 8, 2001

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

*INCOMING  
C/007/038-AM01B-1*

RECEIVED

**Re: Revisions to Reclamation Plan, Response to Technical Analysis, Willow Creek Mine, C/007/038-AM01B, Carbon County, Utah**

Dear Ms. Grubaugh-Littig:

Plateau Mining Corporation (PMC) is submitting its response to the Division's August 2001 Technical Analysis regarding the aforementioned.

The identified deficiencies are provided below along with PMC's response.

**R645-301-121.200**, 1) *Correct the 7 typographical mistakes and inconsistencies detailed above, and 2) Show the drainage and sediment control features which will be retained during the reclamation period on Maps 21A through 21E.*

1) **Page 5.4-2** has been amended to reflect the removal and reclamation of sedimentation ponds and associated structures. The reason this bullet item was crossed-out is because it referred to the reclamation sequence where sediment ponds and associated structures are retained following the backfilling and grading activities. The revised reclamation plan reflects the ponds and associated structures being removed during the backfilling and grading activities under the "Backfilling and Grading to Establish the Final Design Configuration" bullet. **Page 5.5-5** reference to straw bale dikes being installed in accordance with the recommendations of Barfield is consistent with the MRP's straw bale installation on Figure 13-12. I had Layne Jensen (EarthFax Engineering) research this and he provided PMC with a copy of Barfield's installation recommendation. In fact, the 1984 and 1994 versions of Barfield are similar. **Page 5.4-5** has been revised to clear up any confusion regarding the removal of temporary sediment control measures. **Page 5.4-8** has been revised to 4 foot of cover instead of 2 foot of cover, in order to be consistent with Page 5.4-9. **Page 5.5-2** has been revised whereby the paragraph addressing the culvert as a temporary structure and be removed during reclamation has been crossed-out in its entirety. Table 13-11 has been revised to show peak flows, thereby being consistent with the former **Page EX 13-35**

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which is now Page EX 13-30 after editing the text to remove the crossed out and incorporate the redlined verbiage. **Page EX 13-36**, which is now EX 13-31, has been revised to show WCRC-2 as the pre-SMCRA culvert under the old railroad grade, not WCRC-1 which was mistakenly typed. Map 21E accurately identifies this culvert and its location. **Table 13-14** has been revised where the footnote "2" has been crossed out. No footnotes are needed on this table.

2) The reclamation plan utilizes deep gouging and mulching for its final treatment measures. The drainage control features referred to in the text are the drainage channels constructed during the backfilling and grading activities. Maps 21A through 21E are titled "Postmining Topography and Drainage Structures Location Map" and Map 21F is titled "Postmining Reclamation Treatment and Watershed Map". Map 21F shows the area receiving treatment through deep gouging and mulching. Any discussion of silt fences and/or straw bales utilized during reclamation activities is for temporary sediment control while the soil placement and treatment activities are being performed and upon completion of the deep gouging and final mulching, the temporary sediment control measures are removed. This is how the text is written and this is why the above mentioned maps do not show the temporary structures postmining.

Additional verbiage was added to pages 5.4-5 and EX 13-27 (formerly EX 13-29) to clarify the intended use of the temporary sediment control measures during reclamation grading and remove any confusion the may exist as to their removal.

The discussion on Page EX13-13 is relevant to the operation phase of the mining activities. The postmining phase of the mining activities begins in Section 4.5 of Exhibit 13 and the alternative sediment control measures is discussed in Section 4.5.2

**Page 5.5-5 and the former EX13-33** (now EX 13-29) verbiage referring to reclamation monitoring and corrective action when a gully greater than 9 inches is created has been revised. However, to state that in all cases reseeding and mulching should be incorporated in the corrective action is in the Permittee's opinion not a prudent commitment. The most important part of any corrective action is to identify the problem and prescribe the proper treatment. Once the proper treatment is rendered, then reseeding and mulching may not always be necessary. Any reseeding should be performed in cooperation with the Permittee and the Division. Depending on the existing vegetation present at the site it could provide the seed source for vegetation reestablishment.

**R645-301-320**, *The references in Volumes 5 and 9 need to be corrected. A clear and concise nomenclature that differentiates the different types of "exhibits" needs to be incorporated into the MRP.*

The Permittee does not consider this finding valid.

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**R645-301-322, -333, -342, -358, *An up-to-date evaluation using current TES information should be provided.***

The Permittee does not consider this finding valid.

**R645-301-323, -411, -521, -622, -722, -731, *See TA for a description.***

The Permittee does not consider this finding valid.

**R645-301-412, -413, -414, -270, -271, -272, -273, -274, *This section of the application needs to include a description of the wildlife the proposed habitat is designated for to accurately characterize the habitat restoration for the site.***

The Permittee does not consider this finding valid.

**R645-301-742.324, *Provide erosion control matting manufacturer literature including engineering specifications and installation instructions.***

The information is being provided for insertion into the back of Appendix H-1.

In the TA, there were a few requested, but not required modifications dealing with the concavity of a few stream channels and the junction where the reclaimed ground surface meets the existing ground at the disturbed area boundary. I had Layne Jensen (EarthFax Engineering) review the requests to determine how much work and expense would be required to address the requests. Mr. Jensen told PMC that to address the Division's request would affect not only the identified maps and stream profiles, but also other maps and their associated topography and profiles due to reworking the backfilling and grading plan.

During actual reclamation backfilling and grading, the reclamation contractor is directed to construct concave slopes and channels, but there are times when the concavity isn't to the degree the Permittee and Division desire. However, final certified as-built reclamation maps, cross-sections, and channel profiles are submitted to present the final postmining topography and certify that the appropriate design criteria are satisfied for Phase 1 bond release.

PMC has addressed the findings it considers germane to the reclamation plan, but refuses to defend those findings identified in the Division's Technical Analysis that it considers erroneous. The Permittee welcomes findings germane to the issue at hand, but is troubled by findings that are not relevant.

Once the Division has had the time to fully evaluate the validity of those findings and should the

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Division consider the findings germane to the reclamation plan, then PMC would like to meet with the Division, with Ms. Mary Ann Wright present, to defend its position as to why PMC believes the findings lack any semblance of validity with regards to the reclamation plan.

If possible, a meeting to discuss this reclamation plan revision and the Adit No. 1 reclamation plan revision during the same meeting would be greatly appreciated.

Sincerely,



Johnny Pappas  
Sr. Environmental Engineer

Enclosures

# APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: C/007/038
Title of Proposal: Response to August 2001 TA, Willow Creek Reclamation Plan, C/007/038-AM01B						Mine: Willow Creek Mine
						Permittee: Plateau Mining Corporation

Description, include reason for application and timing required to implement:

Respond to Division's Technical Analysis and Deficiencies date August 2001

**Instructions:** If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

Attach 3 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

J. J. Pappas - Sr. Engr. - 10/9/01  
Signed - Name - Position - Date

Subscribed and sworn to before me this 9 day of October, 2001.

Jona M. Skerl  
Notary Public

My Commission Expires: 1/20, 2002  
Attest: STATE OF UTAH  
COUNTY OF CARBON



**NOTARY PUBLIC**  
**JONA M. SKERL**  
42 Garden Street  
Helper, Utah 84526  
My Commission Expires  
January 20, 2003  
**STATE OF UTAH**

Received by Oil, Gas & Mining

ASSIGNED TRACKING NUMBER

