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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)

January 12, 2001

TO: [redacted]

THRU: Pamela Grubaugh Littig, Permit Supervisor
Daron R. Haddock, Permit Supervisor

FROM: Peter H. Hess, Reclamation Specialist III

RE: Notice of Temporary Cessation, Plateau Mining Corporation, Willow Creek Mine, [redacted]TC00M

SUMMARY:

On July 31, 2000, a mine fire accompanied by a series of explosions occurred at the Willow Creek Mine in the D-3 longwall panel. Upon evacuation of the mine, the permittee, in coordination with the U.S. Department of Labor, Mine Safety and Health Administration, made the decision to seal the Mine with temporary dirt seals.

The monitoring of the mine's atmosphere has been ongoing since. The layoff of personnel occurred prior to the date of this document. On December 11, 2000, the permittee notified the UDNR/OGM that the decision had been made by upper management to enter the property into temporary cessation.

This document has been prepared to determine the adequacy of the permittee's notification that the Willow Creek Mine and preparation plant and its associated facilities have been adequately placed in temporary cessation status. This is not an amendment, simply "notification". This memo outlines and affirms that the notification requirements were met.

TECHNICAL ANALYSIS:

OPERATION PLAN

CESSATION OF OPERATIONS

Regulatory Reference: 30 CFR Sec. 817.131, 817.132; R645-301-515, -301-541.

Analysis:

Regulation **R645-301-515.300** requires that the mining and reclamation plan for a permitted mine site incorporate a procedure for the temporary cessation of operations. Temporary cessation is briefly discussed within the Willow Creek Mine mining and reclamation plan on Page 4.5-8, under **4.5.1.8 Certification, Inspection, Reporting and Emergency Procedures.** This section in turn refers one to **Section 4.5.2.4, Temporary Cessation,** which can be found on page 4.5-62. Although this paragraph states that the need for the Willow Creek operations to enter into temporary cessation is unlikely, same was written prior to a thorough understanding of the geologic conditions prevalent in the permit area.

Regulation **R645-301-515.310** requires that the permittee meet all of the terms and conditions of the currently approved mining permit, irregardless of the fact that the permitted site is considered to be under temporary cessation. The paragraph mentioned above **(4.5.2.4)** commits the permittee "to maintain the mine surface facilities.....and to prevent or minimize potential related adverse impacts on the environment." The same paragraph also commits the permittee to the fact that "the site would be put on extended maintenance and care status until operations could be reactivated or a decision is made to permanently close the operation." "Maintenance and care status would involve the use of mine or contract security personnel to.....regularly inspect the site to identify any hazardous conditions, and conduct routine maintenance and repair to prevent significant deterioration or damage to the existing structures and facilities."

Paragraph two of the December 11, 2000 letter in which Plateau Mining informed the UDNR/OGM of its desire to enter into temporary cessation reaffirms the commitment that "PMC will continue to maintain environmental and control measures on all surface areas and perform environmental monitoring as required by the permits."

Regulation **R645-301-515.311** requires that the permittee will effectively support and maintain all surface access openings to underground operations, as well as all surface facilities in which there are no current operations, but operations are to be resumed under an approved permit. This regulation applies to the five portals at the "D" seam access, as well as the vertical air shaft to the Mine's ventilation fan (depicted as 10 and 7 respectively on Map 18B, Mine Surface Facilities). These access points to the underground facilities have been temporarily sealed by backfilling same with earth material. Effective support remains in place through the use of arches and other standard methods of ground control.

All other surface facilities including the preparation plant, the School House Canyon waste rock disposal facility, coal storage handling/loading facilities and sediment containment structures are covered under this requirement.

The paragraph mentioned above **(4.5.2.4)** commits the permittee "to maintain the mine surface facilities.....and to prevent or minimize potential related adverse impacts on the environment." The same paragraph also commits the permittee to the fact that "the

site would be put on extended maintenance and care status until operations could be reactivated or a decision is made to permanently close the operation." "Maintenance and care status would involve the use of mine or contract security personnel to.....regularly inspect the site to identify any hazardous conditions, and conduct routine maintenance and repair to prevent significant deterioration or damage to the existing structures and facilities."

Paragraph two of the December 11, 2000 letter in which Plateau Mining informed the UDNR/OGM of its desire to enter into temporary cessation reaffirms the commitment that "PMC will continue to maintain environmental and control measures on all surface areas and perform environmental monitoring as required by the permits."

Regulation **R645-301-515.312** is relative to a surface coal mining and reclamation operation. Willow Creek Mine/Preparation Plant is an underground coal extraction operation. This regulation is not applicable.

Regulation **R645-301-515.320** requires the permittee to submit a notice of intent to cease or abandon operations, as soon as it is determined that the period of temporary cessation will extend beyond thirty days. Although the sealing of the Mine occurred in August, 2000, Plateau Mining Company corporate management did not make the decision to enter into temporary cessation until, on or about, December 11, 2000. The letter to that effect is dated December 11, 2000.

Paragraph one of the December 11, 2000 letter indicates that as of the date of issue, "the period of temporary cessation is indefinite pending the results of the MSHA investigation and internal reviews."

The permittee has notified the Division that coal mining operations have "ceased," while the Mine is considered to be under temporary cessation.

Regulation **R645-301-515.321** requires any permittee who conducts underground coal mining and reclamation activities and who has submitted a notice of intent to enter into temporary cessation include with said notice a statement of the exact number of surface acres and the horizontal and vertical extent of subsurface strata which have been in the permit area prior to cessation or abandonment, the extent and kind of reclamation of surface area which will have been accomplished, and identification of the backfilling, regrading, revegetation, environmental monitoring, underground opening closures, and water treatment activities that will continue during the temporary cessation.

Plateau Mining Company's letter of intent to enter the Willow Creek Mine into temporary cessation dated December 11, 2000, lists 161.55 acres of disturbed area and 14,670 acres within the permit area. Based on the knowledge of this reviewer, the only reclamation activities which have been undertaken by the permittee are those which were relevant to minor coal exploration activities.

The permittee has regraded the surface of the School House Canyon refuse facility to reincorporate any volumes of BTU resource recovery material which had been stockpiled as of July 31, 2000. Positive drainage of the pile has been established by crowning; ditches on the pile appear to be in good working order. There has been no backfilling at the site.

All revegetation work which has been performed is relative to topsoil storage area protection, stabilization of cut or fill areas, or reclamation of minor coal exploration pads and access roads. When the second fire and explosion occurred on July 31, 2000, the permittee reopened the access road (which had been reclaimed in the fall of 1999) to EDH-3 and EDH-4 which are located in Dinosaur and Eagle Canyons. These holes were required for in-Mine atmospheric monitoring of the fire. Thus, the roads were felt to be necessary by the permittee and MSHA. The roads constitute a disturbance of 2.2 acres. The boreholes are not plugged.

All other surface disturbance which is relative to minor coal exploration or the establishment of gob ventilation boreholes is under the jurisdiction of the United States Department of the Interior, Bureau of Land Management. Said acreages are not considered within this document.

There has been no revegetation performed relative to reclamation of the Mine site or preparation plant disturbed area.

The closure of openings to access the underground workings has been previously addressed under **R645-301-515.311.**

There are no known water treatment activities occurring at the Willow Creek site. Ground water no longer reports to pond 001A via the Mine's de-watering system.

The continuation of environmental monitoring has been committed to by the permittee and has been discussed previously under **R645-301-515.310.**

Regulation **R645-301-515.322** is relative to a surface coal mining and reclamation operation. Willow Creek Mine/Preparation Plant is an underground coal extraction operation. This regulation is not applicable.

Findings:

The Willow Creek Mine mining and reclamation plan contains a procedural plan for the temporary cessation of mining operations as required by **R645-301-515.300**.

The commitment made by the permittee in the mining and reclamation plan and its reaffirmation to do so in the December 11, 2000 notification of temporary cessation to maintain the surface facilities for the underground mine and the preparation plant, as well as prevent any

environmental harm, adequately addresses the requirements of **R645-301-515.310.**

The commitment made by the permittee in the mining and reclamation plan and its reaffirmation to do so in the December 11, 2000 notification of temporary cessation to maintain the surface facilities for the underground mine and the preparation plant adequately addresses the requirements of **R645-301-515.311.**

Notification of entrance into temporary cessation is not applicable to requirements of **R645-301-515.312**.

The permittee's notification to the Utah Division of Oil, Gas and Mining to enter the Mine into temporary cessation was made as soon as it was determined by the permittee that same would extend beyond thirty days. Coal mining operations have ceased.. The requirements of **R645-301-515.320** have been met.

The requirements of **R645-301-515.321** have been adequately met.

Notification of entrance into temporary cessation is not applicable to requirements of **R645-301-515.322**.

RECOMMENDATION:

Temporary cessation notification, C/007/038-TC00M adequately addresses all requirements of **R645-301-515.300 through -515.322.** It is recommended that TC00M be approved as submitted.

It is also recommended that the UDNR/OGM request a list of the machinery, as well as a location map for all mining machinery, which was in-Mine at the time of the July 31, 2000 fire. This information may be needed for future reference.

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