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

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April 20, 2001

TO: [REDACTED]

THRU: Daron R. Haddock, Permit Supervisor 

FROM:  Priscilla W. Burton, Soils Reclamation Specialist, Team Lead

RE: Technical Field Visit, Crandall Canyon Reclamation Plan, Plateau Mining Company, Willow Creek Mine, [REDACTED] BR01A.

**Other Attendees:** Johnny Pappas, PMC  
Vicky Miller, PMC  
Paul Baker, DOGM  
Gregg Galecki, DOGM  
Pete Hess, DOGM

**Date & Time:** April 19, 2001, 9:30am - 1:30pm

**PURPOSE:**

To discuss issues raised by the recent change in post-mining land use and its effect on the reclamation plan for Crandall Canyon.

**OBSERVATIONS:**

Land adjacent to the surface disturbance in Crandall Canyon is under real estate contract. The buyer has requested that the primary road in Crandall Canyon remain and that access to side canyons is provided. The buyer requires access immediately upon purchase. The buyer's access to the upper reaches of the canyon during the bond evaluation period exposes PMC to increased risk of reclamation failure due to ATV traffic and other trespass on land not released from bond. PMC foresees that once land is transferred and the landowner has access to the leach-field road, it will be virtually impossible to keep ATV traffic off of the reclaimed area.

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**TECHNICAL FIELD VISIT**

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Johnny Pappas provided us with a map outlining the tracts of land under negotiation for sale. The map is attached.

The revised reclamation plan includes retention of the primary road in Crandall Canyon. PMC has inquired about retaining the road from the upper pad to the leach field as well to reduce their liability. The leach field road was seeded with an interim mix approximately ten years ago and is well vegetated.

The following issues were raised by PMC:

- Reduction of the total bond from \$1.8 million to \$1.3 million because of the retention of the primary road.
- Retention of the leach field road "as-is" for post-mining land use.

DOGM staff were interested in the configuration and attributes of the undisturbed reaches of Crandall Creek. The creek carries a lot of sediment from the steep upper reaches and deposits the sediment at the mouth of the canyon. There were no extensive areas of riparian vegetation. Grass was noted growing on the stream bank in a very limited area near the canyon mouth. The vegetation along the stream was predominantly to conifers. This is probably due to the ephemeral nature of the stream.

DOGM staff also observed the existing cut slopes and discussed with PMC the backfilling and grading plan for covering the cuts. PMC foresees that there will be some cuts remaining after grading in the vicinity of the shafts.

**RECOMMENDATIONS:**

On the first issue, DOGM staff have made the following comments:

- Bond can not be reduced because DOGM must ensure its ability to reclaim to pre-mining conditions.
- The pre-mining condition was a jeep road up the canyon.
- Bond could be reduced after the land sale occurs to the buyer who has requested (in writing) road retention and access to side canyons.

On the second issue, DOGM staff have made the following comments:

- Two of years vegetation data will be required for bond release on the leach field road since it was seeded about ten years ago.
- The leach field vegetation has a high percentage of non-native smooth brome grass which has desirable attributes for the buyer of the property: it is resilient and provides good erosion control. However, the buyer has no legal standing to dictate the reclamation of the site.

- Once the buyer assumes ownership of the land, a written request to retain the leach field road in its present configuration and with its non-native vegetation would be sufficient justification for DOGM to concur with that change in reclamation plan. The location of the section of road under discussion must be indicated on a map.
- Minimal work may be required on the leach field road to take it from interim reclamation status to road. (i.e. grading and drainage controls.)

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