

**PLATEAU
MINING
CORPORATION**

Willow Creek Mine
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An affiliate of **RAG**

January 5, 2004

Mr. Daron R. Haddock
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Handwritten:
Daron
C/007/0038
Copy Daron

Re: Industrial Post-Mining Land Use Change, Plateau Mining Corporation, Willow Creek Mine, C/007/038, Task ID #1771, Carbon County, Utah

Dear Mr. Haddock:

Plateau Mining Corporation (PMC) is herewith addressing the Division's findings regarding the aforementioned. As usual, PMC will list the deficiency in italics followed by its response in regular type.

R645-301-542.320, MAP 18C must be corrected to reflect the reclamation of the Mine's fan pad/equipment storage area. MAP 18C must also be re-certified and re-submitted.

PMC apologizes for not clearly explaining itself regarding this issue and why the reclamation topography is not shown on Map 18C. Map 18C is the Post Mining Land Use Surface Facilities Map and is intended to depict those facilities necessary to support the intended post mining land use. Map 18C does not designate this area as an equipment/material storage yard which is normally denoted by a Number 38.

The fan pad/equipment storage area is not intended to be retained to support the post mining land use as is reflected on Map 21A which depicts the intended reclamation topography. Map 21A reflects the backfilling plan for this area.

A comparison between Map 18B and Map 18C will show that under the current conditions (Map 18B), the fan pad area has an arrow pointing to it with a Number 38 (equipment/material storage yard) in a circle and that in the post mining land use condition (Map 18C) there is not an arrow pointing to it; meaning that it is not to be retained as an equipment/material storage yard, but to be reclaimed as depicted on Map 21A.

R645-301-551, Casing and Sealing of Underground Openings. The proposal to backfill the tunnel openings is inadequate, as it does not describe the methods which will be used to stow and compact the backfill seals to make them as reasonably permanent as possible. The Division needs a commitment from the Permittee to place additional material over the tunnel openings, such that a 2H:1V final surface configuration is achieved over the openings, ensuring a reasonably permanent seal.

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DIV. OF OIL, GAS & MINING

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PMC would like to refer the Division to Map 21D which depicts the post mining topography for the long and short tunnels areas under the approved full reclamation scenario and the industrial post mining land use scenario. The Division will notice that the backfill elevations and slopes above the tunnel openings are exactly the same.

There will be anywhere from 14-30 feet of fill above the top of the tunnel openings in addition to the 25 feet of material placed in-by the tunnel openings. The material placed over the tunnel openings is placed in a fashion whereby an overall 2H:1V slope is created as shown on Map 21D. When looking at Map 21D and using the long tunnel as an example, the operational elevation at the top (roof) of the long tunnel opening is 6190 feet and the reclamation elevation over the long tunnel opening is between 6202 and 6206 feet. This 12-16 foot reclamation elevation change is due to the presently approved backfilling plan.

Taking a 50 foot long cross-section perpendicular to the slope and over the long tunnel opening from the top of the reclamation fill at the 6214 feet to the reclamation elevation of 6190 feet, one gets a rise over run of 24 over 50 which equals 48% slope or approximately 2H:1V. PMC constructs its reclamation slopes, wherever possible, in a concave manner. This requires a steeper slope towards the top of the fill and a somewhat flatter slope at the toe.

Not only will the openings be sealed with noncombustible material in-by 25 feet and covered with backfill material to create the appropriate slopes as shown in the approved reclamation plan, but all access to the openings will be removed. The aforementioned sealing of tunnel openings which are discussed and shown in the mining and reclamation plan provide permanent closure measures designed to prevent access to the opening by people, livestock, wildlife and machinery.

Hopefully PMC is providing clearer explanations regarding Map 18C and the permanent closure of the rock tunnel openings; whereby, the Division can find these two outstanding issues satisfactorily addressed and issue to appropriate approval.

The Division needs to review the proposed public notice within the application, so that PMC can proceed with the public notification and comment process as required by the regulations.

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

Sincerely,



Johnny Pappas
Sr. Environmental Engineer