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**PLATEAU  
MINING  
CORPORATION**

Willow Creek Mine  
PO Box 30  
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Helper, Utah 84526  
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An affiliate of **RAG**

January 8, 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



**Re: 2003 Midterm Permit Review, Plateau Mining Corporation, Willow Creek Mine, C/007/038, Task ID #1751, 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.

PMC believes that the following deficiency is addressed in the approved plan and understands where such an oversight is possible when reviewing a document as voluminous as mining permits are. By sheer happenstance, PMC came across the attached permit page when it was deciding where to appropriately address the Division's finding.

*R645-301-742, et al., The Permittee must state what type of sediment control measures they will implement during reclamation of the pad under topsoil pile #1 if they need to use that topsoil pile.*

The Permittee believes that this finding is addressed in the approved permit as shown on the attached page 3.7-53 from Exhibit 20, Chapter 3, Section 3.7-5(4)(5) (Alternative Sediment Control Measures). However, PMC did further clarify the topsoil location adjacent to the gate in Price Canyon off Highway 6.

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

Sincerely,



Johnny Pappas  
Sr. Environmental Engineer

Enclosure

File: Willow Creek Mine - Midterm Review  
Chron.: JP040102.ltr

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JAN 12 2004

DIV. OF OIL, GAS & MINING

# APPLICATION FOR COAL PERMIT PROCESSING

Permit Change  New Permit  Renewal  Exploration  Bond Release  Transfer

**Permittee:** Plateau Mining Corporation

**Mine:** Willow Creek Mine

**Permit Number:** C/007/038

**Title:** Midterm Permit Review

**Description,** Include reason for application and timing required to implement:  
Crandall Canyon Topsoil Stockpile No. 1 ASCM Clarification

**Instructions:** If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

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

**Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you.** (These numbers include a copy for the Price Field Office)

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.

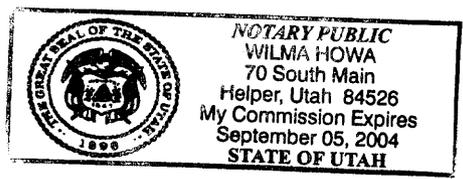
JOHNNY PAPPAS  
Print Name

J.P. Pappas - Sr. Env. Engineer - 1/9/04  
Sign Name, Position, Date

Subscribed and sworn to before me this 9<sup>th</sup> day of January, 2004

Wilma Howa  
Notary Public

My commission Expires: 9/5, 2004 }  
Attest: State of Utah } ss:  
County of Carbon



<b>For Office Use Only:</b>   	<b>Assigned Tracking Number:</b>  	<b>Received by Oil, Gas &amp; Mining</b> <div style="text-align: center; font-size: 1.5em; font-weight: bold;">RECEIVED</div> <div style="text-align: center; font-size: 1.2em; font-weight: bold;">JAN 12 2004</div> <div style="text-align: center; font-weight: bold;">DIV. OF OIL, GAS &amp; MINING</div>
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The proposed alternative sediment control measures can be classified into three categories: mechanical treatment, surface protection measures, and filtering structures. Mechanical treatment increases surface roughness thereby reducing overland flow velocity, which minimizes the sediment transport capacity. Detaining some of the would-be runoff also improves soil moisture for plant germination and plant growth. Surface protection measures include mulching, mulch binders and seeding. These measures are the most effective controls since they minimize the amount of soil detached by raindrop impact, and thus limit soil loss at the source. Surface protection measures also increase the surface roughness and increase water infiltration into the ground. Filtering structures inhibit runoff and sediment transport capacity by reducing flow velocity. They also physically trap sediment in the filter openings while allowing water to pass through.

Generally, the areas where the ASCM's will be implemented consist of the topsoil stockpile No. 1 (adjacent to the gate in Price Canyon off Highway 6), topsoil stockpile No. 2, reclamation channel, and the facilities area. These features are identified on Exhibits 3.7-7B, 3.7-7C and 3.7-7F.

Mechanical treatment will be performed following the topsoil spreading and mulching of the site area by gouging the soil to a depth of 12" to 18" using the bucket of a track-mounted backhoe. Gouging will loosen the soil, allow root penetration, increase surface roughness, and increase moisture storage. This will allow for quicker vegetation establishment, which will reduce erosion. The depressions from the gouging trap sediment dislodged by raindrop impact and overland flow. They also shorten the exposed reaches over which runoff will flow, thereby reducing the sediment carrying capacity of the runoff.

In regard to surface protection measures, the incorporation of the mulch into the surface roughening will ensure that the major portion of mulch is anchored on site. The mulch itself can significantly reduce the amount of sediment yield from an area (Simons, Li & Associates, 1983, p. 4.30) The mulch also helps retain moisture to allow for seed germination. Based on a rainfall intensity factor, for the 10-year, 6-hour storm event, of 0.61 inches per hour, the minimum mulch application rate is 0.9 tons per acre to prevent mulch removal by rainfall (Simon et al., 1983, Figure 4.14). For added protection, during the mulching prior to roughening, mulch will be applied at the rate of 2 tons per acre.