

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 2, 2006

TO: Internal File

THRU: Pamela Grubaugh- Littig, Permit Supervisor
Wayne H. Western, Environmental Scientist III/Team Lead.

FROM: Priscilla Burton, Environmental Scientist III/Soils.

RE: Mine Facilities Area – Phase I and III Bond Release, Task No. 2521, Plateau Mining Corporation, Willow Creek Mine, C0070038

SUMMARY:

The Permittee requested Phase I bond release on 20.8 acres of land previously used for the overland conveyor corridor in Willow Creek and Price Canyons and Phase III bond release on 36.4 acres of land to be released for the postmining industrial/commercial use. These areas are identified on Map 21G-AB.

As Built information for these areas is found in Ex. 23 of the MRP. Structures remaining after reclamation to support the industrial post mining land use are itemized in Sec. 5.4.2.2. They are the substation, warehouse, maintenance shop, bathhouse, office building, parking area, storage pad, roads and sediment pond 001. Confirmation of the industrial postmining land use is found in Attachment 6 of Ex 23.

Phase I bond release for the 20.8 acre overland conveyor site is recommended.

Phase III bond release for the 36.4 acre industrial/commercial use is also recommended.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Redistribution

The requirements for Phase I bond release are outlined in R645-301-880.310. Requirements for Phase III bond release are described in R645-301-880.330. The Rule specifically states that “no bond will be fully released under provisions of this section until reclamation requirements of the Act and the permit are fully met.

Earthwork (including seeding) at the Willow Creek site was completed in the fall of 2004. Reclamation as-built topography is shown on Maps 21 A – AB through 21 G – AB and associated cross-sections on Map 22A-AB. A total of 193,067 yd³ was moved to reclaim the overland conveyor and a total of 591,286 yd³ was moved to reclaim the main mine highwall (Attach. 3, Ex. 23).

Soil replacement is described in Sec. 5.2.2.2 of Ex. 23. Soils from the adjacent grass and sagebrush covered slope were used for final cover over the long and short tunnels. The Willow Creek Mine topsoil stockpile was utilized in reclamation of the main mine facilities high wall. Analysis of the stockpiled soil and adjacent undisturbed areas are found in Sec. 4.2.2.2 of the MRP.

Findings:

The information provided meets the requirements for Phase I and Phase III bond release.

STABILIZATION OF SURFACE AREAS

Regulatory Reference: 30 CFR Sec. 817.95; R645-301-244.

Analysis:

Reclamation treatments are shown on Map 21 G-AB. The regraded site was covered with hay (2 tons/ac.) that was gouged into the surface before seeding. The hydroseeding operation was followed by a surface application of 1.5 tona/ac hay mulch and 500 lbs/ac tackifier. Locations of the gouging and seeding treatments are shown on Ex. 3.4-17AB.

Findings:

The Permittee has adequately applied best management practices to control erosion and prevent sediments from leaving the site.

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RECOMMENDATIONS:

Phase I bond release for the 20.8 acre overland conveyor site is recommended.

Phase III bond release for the 36.4 acre industrial/commercial use is also recommended.

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