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American Electric Power  
Service Corporation  
Fuel Supply Department  
P.O. Box 700  
Lancaster, OH 43130-0700  
614 687 1440

RECEIVED

JUL 08 1991

DIVISION OF  
OIL GAS & MINING

AEP  
FUEL  
SUPPLY

ACT 1007/002  
Mine file B  
D. Haddock

Mr. Lowell Braxton  
Utah Division of Oil, Gas and Mining  
3 Triad Center, Suite 350  
355 West North Temple  
Salt Lake City, Utah 84180-1203

July 3, 1991

RE: BLACKHAWK COAL COMPANY - WILLOW CREEK SITE  
SUPPLEMENTAL INFORMATION

Dear Mr. Braxton:

After reviewing the letter dated June 21, 1991 from Mr. W. Hord Tipton of the United States Department of the Interior to Dr. Diane Nielson, Director of the state of Utah's Division of Oil, Gas and Mining (UDOGM), we believe that OSM's response appears to lack material background information regarding the use of the site.

The following are salient facts we believe OSM must be made aware of.

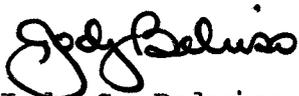
- UDOGM's Abandoned Mine Lands (AML) Program had an Agreement with Blackhawk to use an adjacent Willow Creek site for an AML project. The AML project had to be extended, at their request, for approximately one-half year. Reclamation was completed on June 1, 1991. Due to the on-going nature of this AML project, there was no security for the area leased to EIS because of the common access road. This road was heavily traveled by both the AML staff and their contractors throughout the period of the AML project.
- After the effective date of the lease with EIS, some materials and/or equipment of EIS were always on site, even with the lack of security stated above. A letter from EIS documenting in detail their use of the site will be forthcoming. Due to the nature of EIS projects, equipment was moved on and off site based upon EIS's needs for individual projects. EIS had contracted to store and does still store one million dollars worth of core samples at the site.

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Mr. Lowell Braxton  
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- The substation located on the permit area supplied power to another Lessee of Blackhawk's (Western Coal Carrier Corp.) for many years in addition to supplying power to this site. Blackhawk is pursuing the leasing of the former Western Coal Carrier site, however, in order for the site to be of commercial value, power from the Willow Creek substation must remain available.
- Attached is a map showing the common access to both the permit area and the AML site. It is imperative that OSM understands the lack of security which occurred during the life of the AML project limited EIS's use of the site to its fullest extent.

We strongly believe OSM must be appraised of these factors before they make a final decision. We would greatly appreciate your presenting this information to them.

Sincerely,

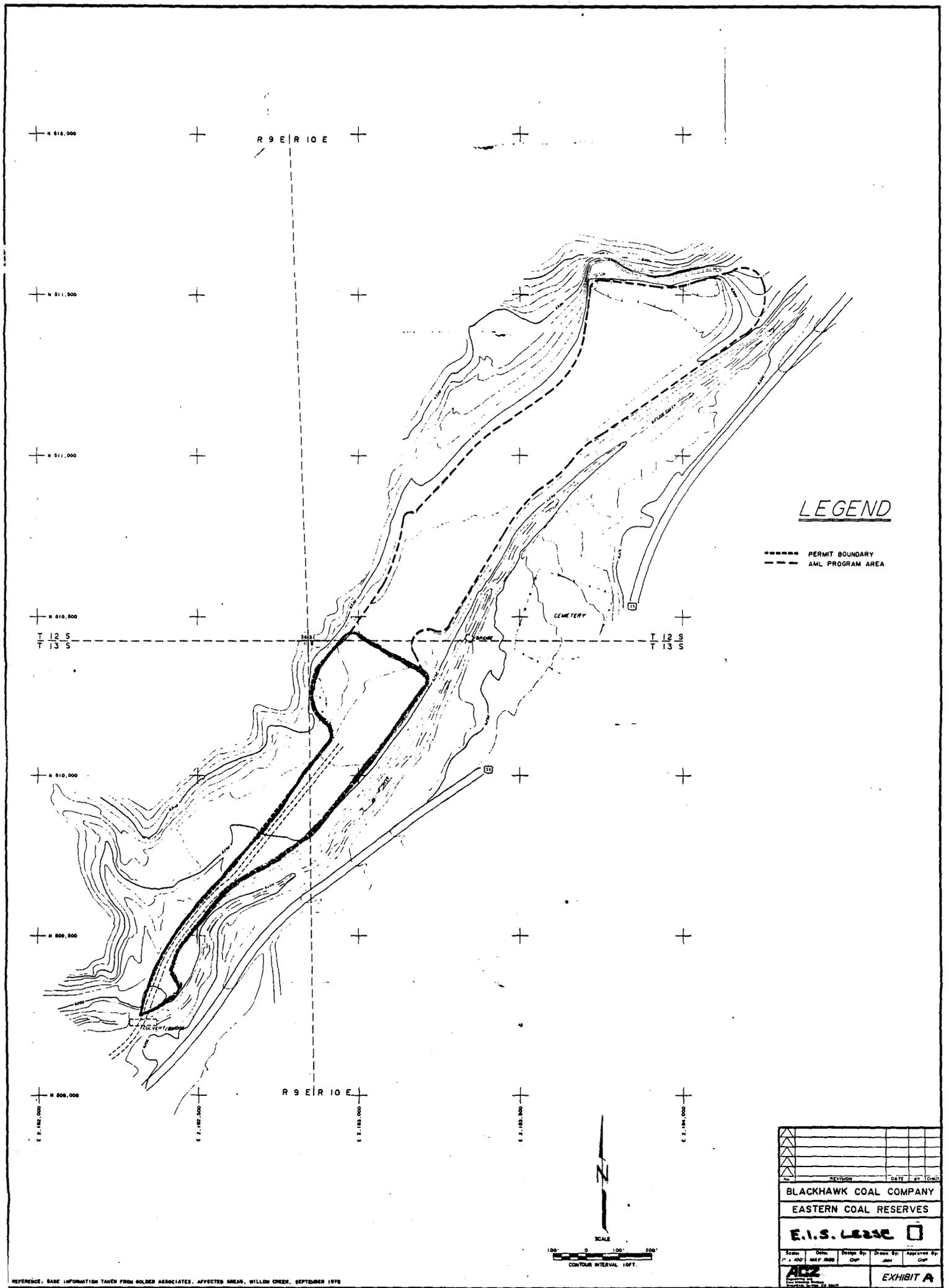


Jody G. Belviso  
Environmental Engineer

jgb

Enclosure

cc: W. C. Bosworth  
W. E. Olson  
R. C. Nowicki



REFERENCE: BASE INFORMATION TAKEN FROM GOLDER ASSOCIATES, AFFECTED AREA, WILLOW CREEK, SEPTEMBER 1978

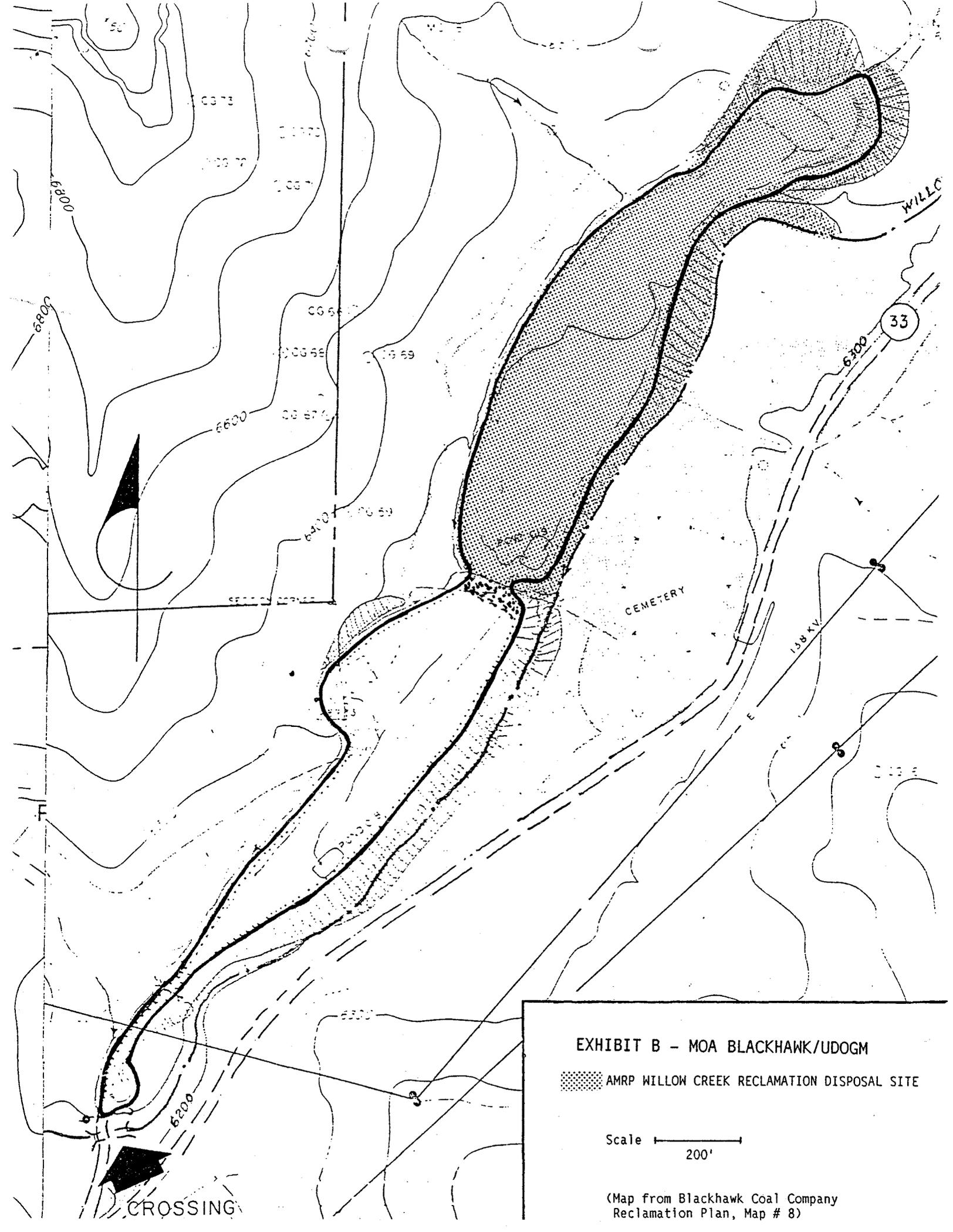


EXHIBIT B - MOA BLACKHAWK/UDOGM

AMRP WILLOW CREEK RECLAMATION DISPOSAL SITE

Scale 200'

(Map from Blackhawk Coal Company Reclamation Plan, Map # 8)