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# PLATEAU MINING COMPANY

A SUBSIDIARY OF UNITED NUCLEAR CORPORATION

Producers & Sellers of Utah Low Sulphur Coal

P. O. Drawer PMC

Price, Utah 84501

Phone 637-2875

*2ND REV.*

May 5, 1978

CERTIFIED  
RETURN RECEIPT REQUESTED

Mr. Henry C. Wilson, Acting Chief  
Branch of Lands & Minerals Operations  
U.S. Dept. of Interior - B.L.M.  
University Club Building  
136 East South Temple  
Salt Lake City, UT 84111

Subject: U-39779; Access Road  
Right-of-Way

Dear Mr. Wilson:

Please find enclosed the additional information that you requested in your letter of April 3, 1978 concerning requirements for further processing of our application for an access road right-of-way. The information is presented in the same format as your letter.

Included in this information are five (5) blueprint copies of the Access Road Survey Map and one (1) sepia of the same.

I would appreciate your assistance in expediting this application for approval to enable us to take full advantage of the construction season.

Sincerely yours,

Thomas F. Bailey  
Executive-Vice President &  
General Manager

/aj

Enclosures (6)



PLATEAU MINING COMPANY

ACCESS ROAD RIGHT-OF-WAY U-39779

1. Section 501(b)(1) of Title V of the Federal Land Policy and Management Act of October 21, 1976.

- a. A listing of any site that may be needed in connection with this particular action.

No site in addition to the right-of-way itself will be required for the construction of the proposed road.

- b. A statement indicating other parties who may be interested in participating in the proposal or who may be affected by it. Also, include the names of parties who have been contacted in this regard.

The interest in the proposed road is limited to the Plateau Mining Company. However, both the State of Utah and Carbon County will require the use of a road for access to the mountain top and TV towers located there.

The proposed road will affect Mr. Clifford Smith in that a right-of-way will be secured to cross his property with a portion of the road. Mr. Smith has been contacted in regard to the road but a formal granting of a right-of-way has not been drafted.

- c. A statement indicating the type of access necessary for both construction and maintenance operations. This may include use of helicopters, off-road vehicles, etc., as well as conventional equipment.

No additional access for construction and maintenance will be required. Access to the construction site will be developed as road work progresses. The work will be accomplished using conventional equipment, i.e., bulldozers, loaders and dump trucks.

- d. A statement of the probable impacts on your operation if the right-of-way is not granted.

If the right-of-way is not granted, it will be necessary to limit or to discontinue mining and preparation plant operations during modification of the existing mine access road to comply with the Office of Surface Mining Regulations. Also, the expected increase in the safety of the mine workers, County repairmen, and others who are now using the existing road would not be realized.

1. e. A brief description of the access road to be constructed, and any other information the applicant feels necessary to justify it.

The proposed road will consist of a dirt road constructed by both cuts and fills. It will have an average width of approximately forty (40) feet and a total length of approximately twelve thousand three hundred (12,300) feet. Of this distance, approximately four thousand (4,000) feet will be located on Bureau of Land Management ground. Upon completion the road will be surfaced with gravel or some other durable material.

Items that add to the justification of the access road are as follows:

1. May be necessary to comply with the Office of Surface Mining Regulations.
  2. Avoid closing mining and preparation plant operations during modification of the existing access.
  3. Decrease the hazards of traveling on the existing road.
  4. Make the road more negotiable to material delivery trucks.
  5. Make facilities accessible to passenger vehicles.
  6. Centralize mine facilities, bathing building, warehouse, and management office.
  7. Construct a more durable road and reduce the impacts of inclement weather on road travel.
  8. Decrease road length and increase quality to reduce maintenance costs.
- f. A detailed description of the environmental impact of the project. (Form 2800-18A)

Purpose of Road Right-of-Way:

To construct a road which is:

1. in compliance with the Office of Surface Mining Regulations. The proposed road will meet the grade specifications as spelled

1. f. 1. Continued

- out in these regulations as the mean grade is 8.95% and in no case exceeds the allowable maximum of 15%. This lower grade when combined with proper construction methods, i.e., drainage ditches, culverts, trash racks and grates, vegetative cover, etc. minimizes the contribution of suspended solids into the runoff water.
2. more easily maintained. The proposed road is located on a south-facing slope which is exposed to direct sunlight throughout the entire day. This exposure to the sun reduces dramatically the duration of any snow accumulation, reducing the cost of snow removal.
  3. possibly more safe (no accidents have occurred on the existing road) in that a more shallow grade reduces chances of runaway vehicles and makes slower, more safe speeds easier to maintain. The forementioned exposure to the sun also allows any moisture contributed by precipitation to be evaporated more quickly, thus providing a maximum time of dry, safe conditions.
  4. accessible to both employee vehicles and heavy trucks which carry supplies necessary for everyday operation of the mine, i.e., rock dust, timber, roof bolts, mining machinery, etc. The existing road has proven in the past to be most difficult for the supply trucks to negotiate unaided during periods of inclement weather. The proposed road will reduce this type of problem.

I. DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

The proposed action consists of a road construction of approximately 12,350 feet in length, of which only about 4,000 feet is located on BLM land. The road is intended to alleviate the conditions spelled out previously in the "purpose" section of this analysis.

The Plateau Mining Company believes that no alternatives to this proposal exist, therefore none are listed here. Any other possible locations for the road would be located on the opposite side of the canyon and be situated on a north-facing slope. By locating a new road on the north-facing slope no advantage would be gained. Another drawback to a new road located on the north-facing slope is that the existing road would be closed during construction blocking coal haulage, thus shutting down the mining operation and laying off the mining and preparation employees, consisting of 137 people.

i. f. II. DESCRIPTION OF THE EXISTING ENVIRONMENT

A. Non-Living Components

The affected area consists of a rugged and steep topography. This type of topography is common to the "Castle Country" area and consists of steep, sparsely-vegetated slopes capped by sheer sandstone bluffs and ledges.

These slopes have average inclinations of 50-60%. The ledges are formed by the erosion-resistant members of the Starpoint sandstone. The slopes between the ledges are formed by the Mancos shale which is softer and more subject to erosion, as it does not support plant life well.

B. Living Components

The hillside vegetation is dominated by Piñon pine and sagebrush with minor occurrences of a few assorted grasses.

Several mammalian species are found on the slope. These range from the chipmunks and squirrels which live there throughout the year to the mule deer which is occasionally seen to cross or graze the hillside in mid-winter.

Little or no domestic grazing occurs due to the steepness of the slopes.

C. Ecological Relationships

The poor soil characteristics provide support for only those plants that are well suited for this area. These plants are of the type that have broad but shallow root systems. The soils are poorly developed because:

1. of poor source material. The Mancos shale is a near-shore marine unit, fine grained, high in both gypsiferous and calcareous minerals.
2. the degree of steepness allows any weathered material to be washed away by the heavy thunder showers or blown away by the gusty winds common to the area.
3. the precipitation is minimal, thus not allowing vegetation to grow and add organic nutrients to the soils.

Because of the interrelationships between poor soils and poor vegetative production the faunal community is restricted as to both diversity and density of species.

1. f. II. C. Continued

The lack of water from springs and seeps places additional restrictions on the animal population.

It might be well to add that the mining and processing operations conducted in this canyon have seemingly not affected the quality and quantity of big game such as mule deer. Mule deer are frequently observed crossing the property and even grazing in the more flat areas. These deer are occasionally observed drinking rain water that collects in low places on the decks near the portals, so there seems to be a peaceful coexistence between coal development and the environment surrounding it.

D. Esthetics

The esthetic value of the area in question would probably be best described as minimal. This minimal value is placed on the canyon for several reasons. First, it is not a canyon through which the public generally travels although access to Gentry Mountain is given to hunters, picnickers and county TV translator repairmen via the mine road.

Second, the Wattis Canyon offers nothing that is not to be found in many other canyons in the area. The canyon does not provide a dramatic viewscape, rather it is drab and has a relatively sparse vegetative cover. The lack of vegetation can be directly attributed to the minimal water resources and the low quality of the soils present here.

Third, there are no permanent residents of the canyon to object to any disturbance of their view area.

E. Human Interest Values

The esthetic value as stated above is very low.

Nothing of historic value such as early American settlements and/or artifacts are to be found in Wattis Canyon. As mining has been carried on at this location off and on since the early Twentieth Century, had anything been present it has since been removed.

The geologic value of Wattis Canyon is virtually absent. The stratigraphic setting is one of a monotonous sequence of shales (Mancos shale) and the Starpoint sandstone members. The sequence is topped by the Mesaverde group of which only the Blackhawk formation is of significant importance in that it is within this horizon that the coals being mined

1. f. II. E. Continued

are located. Should the economics of the coal be negated any geologic value would be removed.

Archeologically the canyon is sterile. No recent or prehistoric dwellings and/or artifacts can be found in its confines.

III. ANALYSIS OF THE PROPOSED ACTION

A. Environmental Analysis

1. Anticipated Impacts

Any time man-made construction projects are undertaken, negative impacts are encountered. Any negative aspects of the road construction shall be more than offset by positive features.

The construction of the road could cause an increase in erosion which in turn would increase the quantity of suspended solids in the run-off water.

2. Mitigating Measures

To eliminate or at least minimize the negative impacts of the road construction there are several procedures to be implemented. First, the road is to be constructed at a mean grade of 8.95% to reduce the velocity of run-off water. Second, the road will be banked to the inside of the hill causing runoff to flow to the drainage ditch located there. Third, the water collected in the drainage ditch will be channeled under the road through a series of culverts and into the natural drainages. Fourth, areas of cut and fill will be vegetated by hydroseeding which will reduce the present amount of suspended solids contributed by the hillside in question. Fifth, the construction of the proposed road will facilitate the reclamation of the existing road. The hillside to be reclaimed is capable of supporting a heavier, more varied vegetative cover, thus making available a greater amount of wildlife forage than is presently produced.

3. Recommendation for Mitigation

It is recommended that the erosion prevention and revegetation methods described above be incorporated into the road design and construction criteria.

1. f. III. A. 4. Residual Impacts

The residual impacts of the road would be limited to the road itself. The road is intended to be left for public access to Gentry Mountain after the mining operation has been discontinued. The proposed road would replace the existing one and be substituted for it under the agreement Plateau Mining Company has with the State of Utah that requests that all roads be left open upon cessation of active mining operations.

B. Relationships Between Short Term Use and Long Term Productivity

The proposed road, as stated above, is for a long term usage; therefore, no short term use/long term productivity relationship can be derived.

C. Irreversible and Irretrievable Commitment of Resource

If the land for the proposed road was not reclaimed, then a total of approximately five (5) acres would be removed from the land resources held by the Bureau of Land Management.

g. Necessary corrections to the survey map.

- i. A proper statement of the engineer who made the survey has been included on the map.
- ii. A proper statement of the certification of the applicant has been included on the map.

2. Section 501(b)(2), requirement of applicant to disclose the identity of the participants in the entity.

a. The name and address of each partner.

Plateau Mining Company is a wholly-owned subsidiary of the United Nuclear Corporation.

b. Name and address of each shareholder owning more than 3 per centum or more of the shares.

The United Nuclear Corporation owns 100 per centum of the shares in Plateau Mining Company.

2. c. Name and address of each affiliate of the entity with the percentage of stock of the entity owned by the affiliate.

United Nuclear Corporation is an affiliate of Plateau Mining Company and controls 100% of the stock of Plateau Mining Company.

United Nuclear Corporation  
UNC Crescent Plaza  
7700 Leesburg Pike  
Falls Church, VA 22043

- d. A copy of your authority to do business in the State of Utah.

Plateau Mining Company is incorporated in the State of Delaware. Article Six (6) in the Articles of Incorporation authorizes the Company to do business in any state of the United States. Carbon County, in the state of Utah, has licensed Plateau Mining Company to carry on business under License and Account Number C 34973.

Copies of the State of Delaware Certificate of Incorporation, Plateau Mining Company Articles of Incorporation, and Carbon County Business License granted to Plateau Mining Company are included.

- e. A copy of the resolution signed by Mr. Keith Cunningham, President, United Nuclear Corporation, authorizing Mr. Tom Bailey, Executive-Vice President & General Manager, Plateau Mining Company to file this application is included.
- f. Evidence of the signing officers' (Mr. Tom Bailey) authority to execute this application is included.

# State of Delaware



## Office of Secretary of State

*J. Eugene Bunting, Secretary of State of the State of Delaware,*  
do hereby certify that the above and foregoing is a true and correct copy of  
Certificate of Incorporation of the "PLATEAU MINING COMPANY", as received and filed  
in this office the twenty-first day of October, A.D. 1971, at 10 o'clock A.M.

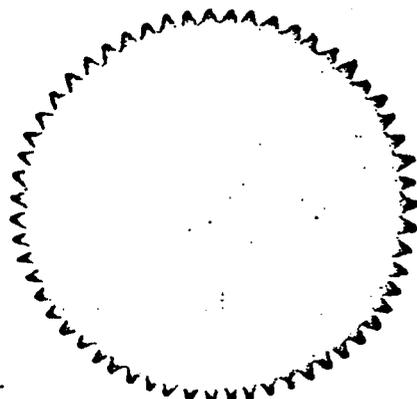
In Testimony Whereof, I have hereunto set my hand  
and official seal at Dover this twenty-first day  
of October in the year of our Lord  
one thousand nine hundred and seventy-one.

*Eugene Bunting*

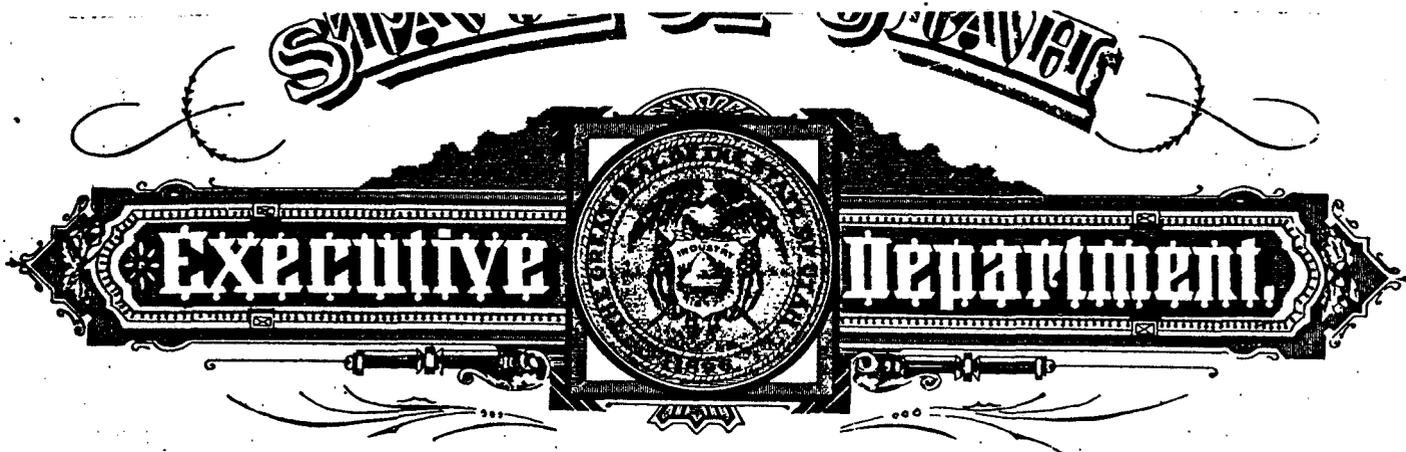
Secretary of State

*R. H. Caldwell*

Ass't Secretary of State







Office of Lt. Governor/Secretary of State

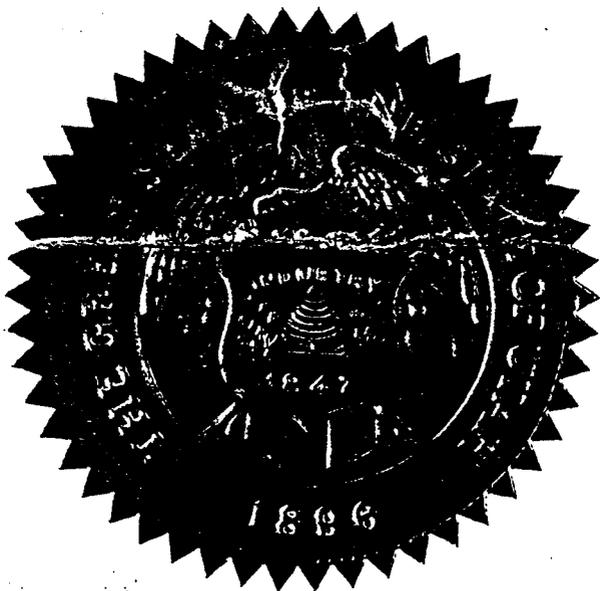
I, DAVID S. MONSON, LT. GOVERNOR/SECRETARY OF STATE  
OF THE STATE OF UTAH, DO HEREBY CERTIFY THAT.....

PLATEAU MINING COMPANY

is a Corporation of the State of Delaware, And is qualified to do  
business in the State of Utah.

A Certificate of such qualification was issued from this Office on October  
28, 1971, and said corporation is in good standing.

AS APPEARS OF RECORD IN MY OFFICE.



IN WITNESS WHEREOF, I have  
hereunto set my hand and affixed the  
Great Seal of the State of Utah at Salt  
Lake City, this 25th day of  
April A.D. 1978.

David S. Monson

LT. GOVERNOR/SECRETARY OF STATE

AUTHORIZED PERSON

No 1013 C

From January 1 1978

Not Transferable

Expires December 31 1978

# CARBON COUNTY

## STATE OF UTAH

### By Authority of the Board of County Commissioners

This License is Granted to PLATEAU MINING COMPANY

In conformity with the Laws of the State of Utah, to carry on the business of Coal Mining Company

at Wattis, Carbon County, State of Utah, for a period of 12 months commencing for the same on the 1st day of January, 1978, and ending on the 31st day of December, 1978, subject to the Laws of the State of Utah, he having paid into the County Treasury the sum of \$ 200.00  
Two Hundred and No/100 DOLLARS

in accordance with the order of the Board of County Commissioners and the same is hereby duly authorized.

GIVEN under my hand and the seal of said County this 22nd day of February, A. D., 1978

County Clerk.

By Carrie H. Crogan, Deputy.

RM TC 70 REV. 11/72

### SALES TAX LICENSE AND/OR CERTIFICATE TO COLLECT USE TAX STATE TAX COMMISSION OF UTAH

THE BELOW NAMED PERSON OR FIRM, HAVING COMPLIED WITH THE PROVISIONS OF THE EMERGENCY REVENUE ACT OF 1933, AS AMENDED, OR THE USE TAX ACT OF 1937, AS AMENDED, IS HEREBY AUTHORIZED TO ENGAGE IN BUSINESS IN THE STATE OF UTAH. THIS LICENSE MAY BE REVOKED FOR VIOLATION OF, OR FAILURE TO COMPLY WITH, ANY PROVISIONS OF THIS LAW. IF BUSINESS IS DISCONTINUED, THIS LICENSE OR CERTIFICATE SHOULD BE CANCELLED.

LICENSE AND ACCOUNT NUMBER C24973

LICENSEE

DATE ISSUED  
MO. DAY YR.  
07/21/77

PLATEAU MINE  
PLATEAU MINING CO  
PRICE UT 84501  
MA P O DRAWER PMC  
PRICE UT 84501

PLEASE USE THIS NUMBER FOR ALL REFERENCE PURPOSES

THIS LICENSE IS NOT TRANSFERABLE

GOOD UNTIL REVOKED OR CANCELLED

MUST BE POSTED IN A CONSPICUOUS PLACE

STATE TAX COMMISSION OF UTAH

*Vernon L. Holman*

VERNON L. HOLMAN  
CHAIRMAN

The Chairman called for the election of officers of Plateau Mining Company for the coming year. On motion duly made, seconded, and unanimously adopted, the following persons were elected to the offices set opposite their respective names:

PLATEAU MINING COMPANY

Officers

Keith A. Cunningham	President
Thomas F. Bailey	Executive-Vice President & General Manager
S. James Chambers	Treasurer
George Slover, Jr.	Secretary
James P. Fahey	Assistant Secretary & Assistant Treasurer
Michael E. Cadwell	Assistant Secretary

Directors

Keith A. Cunningham, Chairman	Director
Thomas F. Bailey	Director
S. James Chambers	Director

each such person to serve in accordance with the Bylaws of the Corporation and until his successor shall have been elected and shall have qualified.

No 1013 C

From January 1 1978

Not Transferable

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# CARBON COUNTY

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LICENSE AND ACCOUNT NUMBER 024973

LICENSEE

DATE ISSUED  
MO. DAY YR.  
07/21/77

PLATEAU MINE  
PLATEAU MINING CO  
PRICE UT 84501  
MA P O DRAWER PMC  
PRICE UT 84501

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