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PLATEAU MINING COMPANY

A Subsidiary of Getty Oil Company

P.O. Drawer PMC

Price, Utah 84501

Telephone (801) 637-2875

Orig CD Mine file Daniels UB Braxton Hedberg Dr. Nielsen

February 21, 1985

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**DIVISION OF OIL
GAS & MINING**

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

Attention: Mr. Wayne Hedberg

Re: Unit Train Loadout Incidental Boundary Revision

Dear Dr. Nielsen:

Enclosed please find an application for an Incidental Boundary Revision to the Plateau Mining Company's Star Point Mines Mining and Reclamation Permit. This application is incident to the Unit Train Loadout Facility Revision approved by the Division on September 28, 1984, and by the Office of Surface Mining on the same date.

This Incidental Boundary Revision has been discussed in depth with Division staff members Wayne Hedberg, Ron Daniels, and with Walt Swain of the OSM, as well as other Division staff members. This submittal is in the form suggested by the Division and the OSM.

The revision includes three parts: (1) The addition of a silo and conveyor transfer point access road; (2) The addition of the area inside the Utah Railway Right-of-Way at the silo location; and (3) The modification of permit boundary lines to include the area actually needed for facilities. A discussion of each part is given below:

(1) The Utah Railway Company constructed a maintenance road paralleling their main line and spur line in 1984. Plateau can take advantage of this road by using it as access to the silo. No new disturbance will be required for Plateau Mining Company's use of the road. The previously planned silo access road will not be needed from the sampling building to the conveyor transfer point;

therefore, a net reduction in disturbed area will be realized of two acres from the previously approved plan. Maintenance of the new road will be much easier, as the majority of the road is at 0.75% grade compared to grades on the previously approved road of 5% to 11%. Maintenance of the road will be performed by Plateau Mining Company by agreement with Utah Railway Company. Post mine land use will be, for the road parallel to the tracks, a maintenance road under ownership and control of Utah Railway Company.

(2) The area within the Utah Railway Right-of-Way lying between the two parcels of land previously permitted by Plateau Mining Company was not included as part of the permit area. Plateau's mining activities in the area within the Utah Railway Right-of-Way, however, were included in the previous permit application and were approved by the Division and the OSM. The reason for not including this area in the permit was due to the fact that the Utah Railway Company thought they had exclusive use under their BLM Right-of-Way. Later investigation by the BLM determined that Plateau would have to obtain a separate Right-of-Way for the silo and conveyor area. Plateau Mining Company has submitted an amendment to its BLM Right-of-Way to add the area within the Utah Railway Right-of-Way. By adding this parcel to the permit area, future problems with the Division concerning jurisdiction and compliance will be avoided.

All applicable sections of the regulations have been addressed in this submittal, as well as in the original application concerning the area within the Utah Railway Right-of-Way to be added to the permit. Topsoil was removed and stockpiled as a part of the Utah Railway track bed construction in 1984. Drainage from the area will be delivered into Sediment Pond 8 prior to being released to the receiving channel.

(3) Slight modifications have been made to the boundary lines to make them fit more closely with the disturbed areas. Some of the area west of the north-south conveyor has been excluded, along with some area south of the silo. The northeast corner has been moved east to include a small amount of area. A small area has been added on the southwest to include a cut made for the con-

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veyor transfer point access road. The net result of these boundary line changes is a reduction in the acreage required by 0.14 acres; this figure includes adding the area needed along the Utah Railway tracks for the silo access road. The original area, previously permitted was 25.19 acres; the new total acreage is 25.05.

By changing the location of the silo access road to the Utah Railway road, and by modifying the boundary lines, a reduction in permit acreage is realized and a reduction of disturbed area is realized. This situation meets the criteria for an Incidental Boundary Revision, which we are requesting at this time.

The enclosed permit application is in the same format as previously submitted, and has been assembled by modifying the applicable sections and maps of the original application.

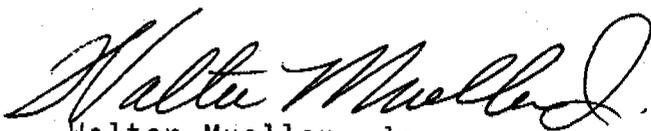
The Unit Train project is an extremely complicated one because of the necessity to construct new facilities and maintain Plateau's ability to ship coal to its customers. The construction schedule is very restrictive, and we therefore ask that the Division expedite review and approve this revision, particularly the access road to the silo area, as the silo is the first item on the critical path. Our construction schedule calls for a May 1 start date to realize the necessary completion date. Plateau stands prepared to assist in any way necessary to help the Division in this regard.

We appreciate your patience with us on this project, as it has been a difficult one.

If you have any questions, please contact Ben Grimes of my office at 637-2875.

Very truly yours,

PLATEAU MINING COMPANY



Walter Mueller, Jr.
Vice President
and General Manager

WMJ:sd

Enclosure