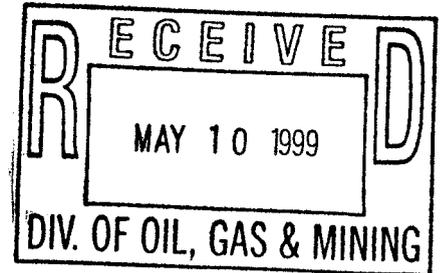




Willow Creek Mine
847 Northwest Highway 191
Helper, Utah 84526
(435) 472-0475
Fax: (435) 472-4780

May 6, 1999

Mr. Daron R. Haddock
Utah Division of Oil, Gas and Mining
1594 West North Temple, STE 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801



ACT/007/006 #2
Daron, Pam

RE: Longwall Abandoned Underground, PHC Revision, Cyprus Plateau Mining Corporation, Star Point Mine, ACT/007/006-99C, File #2, Carbon County, Utah

Dear Mr. Haddock:

Cyprus Plateau Mining Corporation (CPMC) believes that the emerging issues regarding the PHC concerns noncoal waste as it may impact groundwater. The abandonment of noncoal waste to be authorized underground is an issue that has not yet been resolved.

CPMC was informed by the coal community that this issue was freely discussed, during the April Coal Operators meeting, and that an understanding was reached whereby the issue would be reviewed by legal counsel from various agencies and the coal community.

In light of this, CPMC is reluctant to revise its Star Point Mine PHC until this issue is resolved to the satisfaction of the agencies and coal community. If you have any questions, please do not hesitate to contact me.

Sincerely,

Johnny Pappas
Sr. Environmental Engineer