

**PLATEAU
MINING
CORPORATION**

Willow Creek Mine
847 NW Hwy 191
Helper, Utah 84526
(435) 472-0482
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An affiliate of

October 21, 2002

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OCT 24 2002

Ms. Pamela Grubaugh-Littig
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

*Response
Incoming
C/007/006*

DIVISION OF
OIL, GAS AND MINING

RE: Permit and Disturbed Area Reduction, Refuse Pile and Borrow and Subsoil Site Separation and Re-permitting by Sunnyside Cogeneration Associates, Plateau Mining Corporation, Star Point Mine, C/007/006-02D, Carbon County, Utah

Dear Ms. Grubaugh-Littig:

Plateau Mining Corporation (PMC) is submitting its response to the Division's August 2002 Technical Analysis regarding the aforementioned.

The identified deficiencies are provided below along with PMC's response.

R645-301-112, *The permittee should label the area outlined on Map 112.500a for the Phillips Petroleum gas wells and utility corridor.*

Now that the Phillips Petroleum permitting action is approved, PMC can now place it on this map along with Maps 321.100h, 542.200c, and 761c. PMC intentionally left all reference to Phillips' permitting action from the SCA permitting action so as not to complicate this action.

R645-301-114, *The application must include current information in Exhibit 112.500a for transfer of the subsoil pile.*

Exhibit 112.500a presents the Surface Use Agreement and Bill of Sale Between Plateau Mining Corporation and Sunnyside Cogeneration Associates for access to and acquisition of 269,160 cubic yards, more or less, of soil.

R645-301-121.100, *The proposed changes to the MRP must contain current information concerning the status of the subsoil stockpile. The current information must be included in acreage figures and maps.*

Appropriate revisions have been made to pages 300-3 through 300-6 and the location of the subsoil pile and a pioneer road for SCA to access the soil is also provided on Map 321.100h. The 0.31 acres associated with the pioneer road are accounted for in the permit area acreages, but not in the disturbed area acreages. The pioneer road is a proposed access corridor for SCA to use during its future soil removal activities.

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R645-301-121.200, *The permittee must show the correct permit boundary lines on Map 321.100h and other maps in the submittal.*

The appropriate corrections have been made.

R645-301-232.500, *The permittee must show the transfer of the subsoil dedicated for reclamation of the refuse pile in Table 233.100, Table 542.200a, and in the narrative of Sections 234 thru 234.320.*

PMC believes that it has properly addressed the Division's findings.

R645-301-521.100 and R645-301-521.190, *The permittee must give the Division a map that shows the entire permit boundary for the Star Point Mine. The permittee must state in the text of the MRP, which map will be the official boundary map.*

The Surface Ownership Map 112.500a will be the official permit boundary map. Pages 100-1 and 500-5 have been revised to reference Map 112.500a as the "Surface Ownership and Official Permit Boundary Map".

R645-301-521.141, *The permittee must supply tables that show the number of permit acres before and after the transfer and number of disturbed acres before and after the transfer.*

Tables 321.100a and 321.100b have been revised to address the findings and also address the acres affected by the Phillips Petroleum Postmining Land Use Change permitting action. Hopefully these tables provide information in a clear and concise manner.

Regarding revisions to Maps 116.100a, 116.100b, and 116.100c, these maps refer to the affected area by coal seam due to underground mining activities. PMC is using the Surface Ownership Map 112.500a to present the official permit boundary (see finding above).

R645-301-761, *The information provided does not meet the minimum Hydrologic Reclamation Plan. The proposed reduction should also comply with R645-301-121.100, clearly stating the permit application format and content. The proposed changes to the MRP must contain current information concerning the status of the hydrologic structures and drainages.*

PMC provided Map 761c showing the reclamation diversion structures affected by this permitting action (SPRD-32 and SPRD-34). PMC did forget to revise Tables 761a and 761b removing or explaining status of diversions. The Subsoil Stockpile was not part of the initial permitting action and that is why reclamation diversions SPRD-39, -41, -42, -43, and a short segment of SPRD-40 were not identified in the first submittal.

PMC is presenting the Division a permitting action that shows reclamation related areas and activities being removed from its permit and disturbed areas. SCA is presenting the Division a permitting action that shows areas being re-permitted under a new permit. It is SCA's responsibility to provide the Division with the aforementioned finding, since they will be responsible for reclamation of the permitting action.

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R645-301-800, Bonding Information.

PMC revised its bond amount to reflect the removal of the subsoil stockpile. Therefore, PMC believes that the reclamation bond should be reduced to \$7,643,000 to reflect the removal of the subsoil stockpile, in addition to the refuse pile area and topsoil borrow site, from the reclamation plan.

Regarding the clear and concise issue that the Division is routinely citing, what is the chance that the Division can make their findings more clear and concise? Often times the Permittee has a difficult time figuring out what the Division is requesting.

If the Division has any questions or needs additional information, please do not hesitate to contact me.

Sincerely,



Johnny Pappas
Sr. Environmental Engineer

Enclosures

File: Star Point Mine - Refuse Pile
Chrono: JP021004.ltr

APPLICATION FOR PERMIT PROCESSING

<input checked="" type="checkbox"/> Permit Change	<input type="checkbox"/> New Permit	<input type="checkbox"/> Renewal	<input type="checkbox"/> Transfer	<input type="checkbox"/> Exploration	<input type="checkbox"/> Bond Release	Permit Number: C/007/006
Title of Proposal: Permit and Disturbed Area Reduction, Refuse Pile and Borrow Site Separation and Re-permitting by Sunnyside Cogeneration Associates, Response to August 23, TA.					Mine: Star Point Mine	
					Permittee: Plateau Mining Corp.	
Description, include reason for application and timing required to implement:						

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Change in the size of the Permit Area? 251.37 acres Disturbed Area? 114.16 acres <input type="checkbox"/> increase <input checked="" type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities? County Conditional Use Permit

Attach 3 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

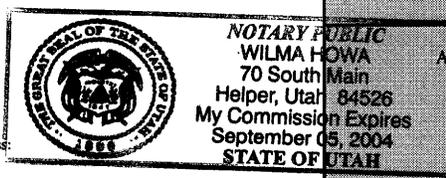
Signed - Name - Position - Date John Pappas - S. Env. Engineer - 10/21/02

Subscribed and sworn to before me this 21st day of October, 2002.

Notary Public Wilma Howa

My Commission Expires: 9/5, 2004

Attest: STATE OF Utah
COUNTY OF Carbon



Received by Oil, Gas & Mining

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ASSIGNED TO
**DIVISION OF
OIL, GAS AND MINING**

Application for Permit Procuring Detailed Schedule of Changes to the MRP

Title of Application: Permit and Disturbed Area Reduction, Refuse Pile and Borrow Site Separation and Re-permitting by Sunnyside Cogeneration Associates, Response to the Division's August 23, 2002, Technical Analysis.

Permit Number: C/007/006

Mine: STAR POINT

Permittee: PLATEAU MINING CORP.

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 100, General - Legal, Financial, Compliance, List of Maps and Exhibits Pages
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 100, Pages 100-01, 100-09, 100-11, 100-12, 100-13 and 100-20
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 100, Exhibit 112.500a, Sunnyside Cogeneration Associates – Surface Use Agreement and Bill of Sale
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Map 112,500a, Surface Ownership and Official Permit Boundary
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 200, Soils, Pages 200-18, 200-19, 200-22, and 200-25
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 300, Biology, Pages 300-3, 300-4, 300-5, 300-6, 300-7, and 300-55
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Map 321.100h, Disturbed Area Map
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 400, Land Use, Pages 400-1
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 500, Engineering, Pages 500-5, 500-72, 500-76,
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Exhibit 542.800a, Reclamation Bonding Summary Pages
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Maps 542.200c, 542.200e2 and 542.200f
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 700, Hydrology, Page 700-188, 700-189, 700-190
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Map 761c
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Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

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