

**PLATEAU
MINING
CORPORATION**

Willow Creek Mine
PO Box 30
847 NW Hwy 191
Helper, Utah 84526
(435) 472-0475
Fax: (435) 472-4782

An affiliate of **RAG**

June 27, 2003

INCOMING
C0070006
AM03D

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

Re: Discontinuance of Vegetation Monitoring via Color Infrared Photography, Star Point Mine, Plateau Mining Corporation, C/007/006, Carbon County, Utah

Dear Ms. Grubaugh-Littig:

Plateau Mining Corporation (PMC) is submitting a permit change to discontinue future vegetation monitoring via color infrared photography. PMC ceased longwall mining in the fall of 1997 and all mining in February 2000. Data gathered in accordance with the Plan show no impacts to the vegetation can be attributed to mining.

PMC has demonstrated for the Division through other permit changes that subsidence has substantially ceased and that there were no impacts to the hydrologic balance caused by mining; therefore, the need to continue the aforementioned monitoring is unwarranted.

Furthermore, the region, as well as the entire state, is experiencing its 5th year of drought and any new photography would reflect the impacts associated to the drought and the appalling insect infestation.

If the Division has any questions or needs additional information, please do not hesitate to contact me at (435) 472-4741.

Sincerely,



Johnny Pappas
Sr. Environmental Engineer

Enclosures

File: Star Point Mine - Color Infrared Discontinuance
Chron.: JP030604.ltr

RECEIVED
JUN 30 2003
DIV. OF OIL, GAS & MINING

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change New Permit Renewal Exploration Bond Release Transfer

Permittee: Plateau Mining Corporation

Mine: Star Point Mine

Permit Number: C/007/006

Title: Discontinuance of Vegetation Monitoring via Color Infrared Photography

Description, Include reason for application and timing required to implement:

Instructions: If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

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

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

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.

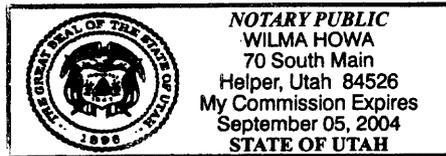
JOHNNY PAPPAS
Print Name

[Signature] - Sr. Env. Engineer - 6/26/03
Sign Name, Position, Date

Subscribed and sworn to before me this 26 day of June, 2003

Wilma Howa
Notary Public

My commission Expires: 9/5, 2004
Attest: State of Utah } ss:
County of Carbon



For Office Use Only: 	Assigned Tracking Number: 	Received by Oil, Gas & Mining <div style="font-size: 2em; font-weight: bold; margin: 10px 0;">RECEIVED</div> <div style="font-size: 1.5em; font-weight: bold; margin: 5px 0;">JUN 30 2003</div> <div style="font-weight: bold; margin: 5px 0;">DIV. OF OIL, GAS & MINING</div>
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In addition, in the Castle Valley Ridge Tract the mine plan is designed to protect perennial streams from subsidence. The impact due to subsidence in the Castle Valley Ridge Tract is expected to be similar to subsidence impacts in the Gentry Ridge Tract.

Vegetation monitoring on U.S. Forest Service property will be monitored by color infrared photography and by visual observations as discussed in Section 500 of this permit document.

Infrared photography for the years 1980 and 1993 were evaluated for vegetation changes due to mining. The evaluation performed by Mr. Paul West of JBR Consultants Group noted possible changes in vegetation at 11 locations, none of which were considered significant since no location encompassed more than 4 acres. Several possible explanations for changes were: insect damage, disease, ground subsidence, groundwater alterations, and weather conditions (precipitation and snow coverage). Another probable explanation was that in the 1980 photographs the trees had leaves, whereas in 1993 photographs the trees were without leaves. The evaluation was submitted to DOGM in the 1993 Annual Report.

The evaluation of the color infrared photography taken in 1998 to those taken in prior years was done by Mr. Patrick Collins of Mt. Nebo Scientific, Inc. His review of the photography indicates no major changes to the plant communities resulted from underground mining activities. As required by permit, this evaluation was submitted in the 1998 Annual Report.

Since the Division has approved amendments to discontinue subsidence monitoring and reduce the requisite water monitoring because subsidence has substantially ceased and it has been demonstrated that no impacts to the hydrologic balance was caused by mining, the Permittee will also discontinue further vegetation monitoring using color infrared photography.

Furthermore, the region, as well as the entire state of Utah, is experiencing its 5th year of drought and any new photography would reflect the impacts associated to the drought and also the insect infestation.

333. FISH AND WILDLIFE PLAN.

ACTIONS TAKEN TO MINIMIZE IMPACTS TO WILDLIFE

All disturbed areas not necessary for use have been seeded with diverse seed mixtures that are compatible with wildlife. New facilities that have been constructed after 1977 have been designed to take wildlife into consideration. Old facilities have been evaluated for their impacts upon wildlife. Mitigative measures have been undertaken to offset disturbance to mule deer winter range.

The Division shall be notified of the presence of any critical habitat of a threatened or endangered species listed by the Secretary or any plant or animal listed as threatened or endangered by state or any bald or golden eagle not previously reported within the permit area.

Roads have been located to minimize impacts to wildlife and speed limits have been reduced to reduce possible impacts to wildlife. The roads do not create barriers to wildlife movement.

The only stream channel near a disturbed area with a potential for aquatic resources is in Corner Canyon near the fan breakouts. No disturbance of the channel was made by the fan construction. The stream has been marked with a buffer zone sign.

Pesticide use is not planned; the Division as well as other appropriate agencies will be consulted for approval should uses be necessary. Fires will not be used on the permit area unless approved.

Plant species for reclamation have been and will be chosen for their nutritional value, cover characteristics and their ability to support and enhance fish and wildlife habitats. Plantings will be grouped and disturbed in a manner which optimizes edge effect, cover and other benefits to wildlife.

made structures exist over areas of potential subsidence, and other renewable resource damage would be mitigated. Should material damage occur to any structure, the structure will be repaired or replaced depending on the situation. CPMC does not anticipate purchase of structures prior to mining, or purchase of special subsidence insurance.

Monitoring to determine the degree of material damage (should it occur) will initially begin with the presubsidence surveys. Should any structure or surface feature become in jeopardy from subsidence effects, additional monitoring will be implemented.

Since no significant buildings, utilities, gas lines, water bodies, or other structures exist above mining areas, and since subsidence characteristics of the area have been well documented in the annual subsidence reports to the Division, the spacing of the proposed monitoring points is adequate to monitor surface movement.

VEGETATION MONITORING ON U.S. FOREST SERVICE PROPERTY

Ongoing monitoring of vegetation on U.S. Forest Service property is conducted according to Table 525.100c, Vegetation Monitoring – U.S. Forest Service Property. Monitoring is conducted to watch for changes in vegetation communities as result of subsidence affects. The primary method of monitoring is by Color-Infrared photography. In addition, ground walk overs and inspections by air are made periodically to monitor for vegetation changes. Reports to the U.S. Forest Service are made according to the schedule shown on Table 525.100c.

TABLE 525.100c
Vegetation Monitoring – U.S. Forest Service Property
Schedule

Action	1980	1983	1985	1993	1998	2003	2008	2013
Color Infrared Photography	X	X	X	X	X	X	X	X
Report*				X	X	X	X	X

* Reports to be submitted with the annual DOGM reports, and to the Manti LaSal National Forest Service.

The color infrared photography taken and the reports generated through 1998 show no impacts to the vegetation can be attributed to mining. Mining activities ceased in February 2000. Since the last report in 1998, the area, as well as the entire state of Utah, has been in a 5-year drought. The drought is affecting the vegetation, so much so, that in 2002 the Manti LaSal Forest Service stated that the moisture content in the vegetation is at levels never measured before. This was reported because although the vegetation looked hardy the fire danger was extremely severe and the Forest Service wanted the public to use extreme caution when on the forest.

Since the Division has approved amendments to discontinue subsidence monitoring and reduce the requisite water monitoring because subsidence has substantially ceased and it has been demonstrated that no impacts to the hydrologic balance was caused by mining, the Permittee will also discontinue further vegetation monitoring using color infrared photography.

Any infrared photography in 2003 will measure the impacts caused by the 5-year drought and with the cessation of mining in 2000 further color infrared photography would not be warranted.

Subsidence monitoring data will be submitted to the Division yearly.

A trail in the U.S. Forest Service system exists near mining in the Little Park Canyon and Castle Valley Ridge area as shown on Map 521.121g1, Subsidence Monitoring Plan. The trail is not located directly above mining but, is within the estimated angle of draw as shown on the map. Since the trail is in the Forest Service system and since the public has access to the trail, a hazard evaluation has been made of possible subsidence effects; this evaluation can be found in Exhibit 525.100b. A monitoring program for the trail and mitigation measures for the trail in the event of damage are presented in the same exhibit.