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**PLATEAU
MINING
CORPORATION**

Willow Creek Mine
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Helper, Utah 84526
(435) 472-0475
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An affiliate of **RAG**

October 21, 2003

INCOMING
C0070006

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: Clean Copies, Discontinuance of Vegetation Monitoring via Color Infrared Photography, Star Point Mine, Plateau Mining Corporation, C/007/006, Task ID#1618, Carbon County, Utah

Dear Ms. Grubaugh-Littig:

Plateau Mining Corporation (PMC) is submitting seven clean copies regarding the permit change to discontinue future vegetation monitoring via color infrared photography. 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.: JP031006.ltr

OCT 27 2003

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: Clean Copies - 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.

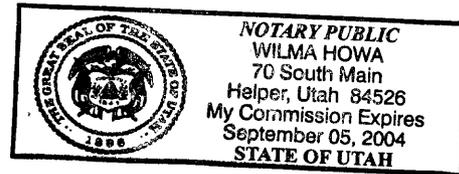
JOHNNY PAPPAS
Print Name

[Signature] Sr. Env. Engineer, 10/22/03
Sign Name, Position, Date

Subscribed and sworn to before me this 22nd day of October, 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 OCT 27 2003
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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.

Enhancement of wildlife habitat in the operations area has been accomplished in the several ways. Interim revegetation has been conducted on all disturbed sites whenever possible using with basically introduced species which have proven value to wildlife. These species usually "green-up" earlier than native species, are more nutritional than native species, and add more diversity in mix than native species.

Eight sediment ponds, one treatment facility, and numerous sediment traps constructed to control run-off also hold water which is utilized by wildlife. This is evidenced by deer and other wildlife tracks at pond edges and trap edges throughout the operations area and many sightings of wildlife drinking from ponds. Water quality in the ponds is acceptable to wildlife as is evidenced by looking at quality data of pond sampling. Lastly the two canyons occupied by mining operations have been closed to hunting which creates a "mini-reserve" for wildlife.

Mitigation and Management Plans

Mitigation of mining impacts on and management of wildlife are always considered and the plans for implementation approved prior to any perturbation. These actions often follow one of three general forms: (1) design of facilities and access or transportation modes to minimize impacts, (2) operation of the mine and associated facilities to minimize impact, and (3) enhancement of wildlife habitat both in the vicinity of and away from the mine in order to mitigate losses that may occur. For additional information refer to Section 330.

In the aquatic inventories performed by the USFS no substantial deterioration of aquatic resources was noted in the inventories for Nuck Woodward Creek in 1993 - 1995, for Gentry Creek in 1994, or for Wild Cattle Hollow Creek in 1994. The aquatic inventories are included in the CPMC Annual Reports for the corresponding years.

The terrestrial wildlife inhabiting and utilizing the area of concern are accustomed to the present facilities and have adjusted their behavior, including migration patterns, so that change would be of more impact than would retaining the status quo. - Conveyors have been constructed to allow deer to cross under, power lines have been designed to be raptor proof and other considerations have been given to all wildlife.

In 1982 approximately 20 acres in mule deer winter range was enhanced by removing and knocking down mature brush, pinyon and juniper trees to promote new growth of shrubs. The area was seeded with a diverse seed mixture compatible with deer usage. In 1983, containerized shrubs were hand see also Section 330).

Employee Awareness and Wildlife

Periodically, all CPMC personnel are required to have presented to them a slide/tape presentation entitled "Coal Mining and Wildlife". The object of this presentation is to spark awareness in CPMC

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
Color Infrared Photography	X	X	X	X	X
Report*				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 and 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.

CPMC will notify surface owners of the mining schedule as required by R645-301-525. For the purposes of Federal land, the Permit Application Package constitutes said notice since it includes all of the required information.

Mitigation of subsidence related effects is as follows:

1. Where subsidence causes surface cracks that prove to be hazardous to grazing livestock or wildlife, CPMC will fence the area and/or undertake restoration measures to eliminate the hazard. Restoration measures that may be used include, but are not limited to: filling cracks, recontouring the affected land surface and revegetating the area with appropriate species. Measures will be undertaken to reduce the potential for erosion. These measures will be undertaken as appropriate and in conjunction with the surface management agency or owner and will be completed prior to bond release. Fencing of surface cracks may be used to exclude livestock from the area. Warning signs placed on the fencing will warn humans of any unsafe areas.
2. Where subsidence causes cracks or features on the land surface that prove to be hazardous to livestock, CPMC will compensate surface owners at fair market value for loss of revenue that would be generated from those lands. Documentation of the lost revenue must be presented to CPMC and the Board of Oil, Gas and Mining including: acres affected, proof of right of use of the land, numbers of animals grazed or AUM's allowed by the surface owner or managing agency, and proof that the hazards were of a magnitude and nature that prevented use of the land.
3. If livestock are proven to have been killed or injured as a direct result of subsidence caused surface hazards, CPMC will compensate the owner at fair market value for lost revenue from those animals.
4. Ground water sources that receive material damage as a direct result of subsidence will be rehabilitated or mitigated. Rehabilitation and mitigation may include, but are not limited to: developing other sources in the vicinity to increase their flow or installing water harvesting facilities such as guzzlers.
5. Mitigation measures for the U. S. Forest trail in the Little Park Canyon/Castle Valley Ridge area are addressed in Exhibit 525.100b.

Land that receives material damage as a direct result of subsidence will be rehabilitated or mitigated. Rehabilitation and mitigation may consist of, but are not limited to: reclaiming or recontouring the area to restore value and revegetating the area with appropriate species.

CPMC will include in the annual Subsidence Monitoring Reports an assessment of impacts (if any) of cliff failure and talus slope formation on vegetation and wildlife. A vegetation mitigation plan will be implemented in the first season after subsidence and cliff failure ceases, or when the area is safe for access.

525.110. MINING METHODS.

CPMC uses longwall and room and pillar methods to extract the coal resource contained in the three economic coal seams on the property. All three seams are not present over the entire permit area.

Longwall panels have been designed with yielding chain pillars to insure a uniform subsidence profile. This smooth subsidence profile is classified as trough subsidence. Normally a gradual flexure of the