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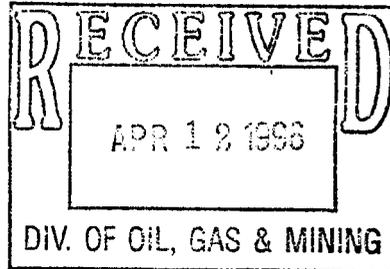


PRO/007/038

#2

April 10, 1996

Jim Dykman  
 State Historic Preservation Office  
 300 Rio Grande  
 Salt Lake City, Utah 84003



Dear Jim;

I have been asked by the Utah State Division of Oil, Gas and Mining (UDOGM) to prepare a letter to you on their behalf to help with the permit process for their Willow Creek Mine Project in Carbon County. The proposed project is expected to impact portions of the historic Castle Gate Mine Site (42CB1000) which lies in the vicinity of the proposed Willow Creek Mine. This letter is intended to provide you with reasoning for a determination of eligibility on that site, finding of effect and a limited data recovery proposal. UDOGM is processing this as a state action under UCA 9-8-404. As such, there is no Federal involvement or review of the project at this time.

The reasoning for eligibility determination of the Castle Gate Mine Site (42CB1000) was originally presented in three reports by Heather Weymouth (all 1995) entitled *A Cultural Resources Evaluation for the Proposed Willow Creek Mine, Carbon County, Utah* (Report No. 669); *A Cultural Resources Evaluation for Proposed Turning Lane Construction Along a Segment of SR 191 For the Willow Creek Mine, Carbon County, Utah* (Report No. 750); and *A Cultural Resources Evaluation of Additional Portions of the Proposed Willow Creek Mine, Carbon County, Utah* (Report No. 749). As stated in these reports, the Castle Gate Mine Site was evaluated for eligibility to the National Register of Historic Places (NRHP) based upon the requirements set forth in 36 CFR 60.4. Following are the criteria used in determining the eligibility of the property:

The quality of significance in American history, architecture, archeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- (A) that are associated with events that have made a significant contribution the broad patterns of our history; or
- (B) that are associated with the lives of persons significant in our past; or
- (C) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

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(D) that have yielded, or may be likely to yield, information important in prehistory or history.

As stated in the reports, it is recommended that the Castle Gate Mine Site (42CB1000) be determined eligible to the NRHP under criteria A, C and D. In addition, individual features were separated out within this extremely large and complex site and it is recommended that each feature be considered either contributing or non contributing elements of the site as a whole. Recommendations for each of these features is attached to this letter as a separate table.

Cyprus Plateau Mining Corporation (Cyprus Plateau) is the proponent on this project to construct the Willow Creek Mine Project. They have prepared and submitted their mine plans to the UDOGM. The project will have some effects to the historic Castle Gate Mine Site, though only a few of the recommended "contributing" features of the site will be adversely affected. Specifically, Features 5, 10, 20, 61 and 65 will be impacted by the construction work. Per Utah State regulations set forth in UCA 9-8-404 UDOGM desires to consult with the Division of State History concerning the effects the proponent will have upon the Castle Gate Mine Site. The effects will be adverse to portions of the site (specifically features 5, 10, 20, 61 and 65), but will not significantly degrade the integrity of the historic mine site as a whole.

In light of UDOGM's understanding that there will be effects to recommended eligible portions of the Castle Gate Mine Site, and because these features cannot be avoided by the proposed mine construction project, it is proposed that a form of data recovery be carried out to mitigate the effects expected to occur to the five features on the mine property. For Features 5, 10, 61 and 65 it is recommended that large format photographs be taken of the structures for state level documentation to Historic American Engineering Record (HAER) standards. It is also recommended that efforts be made to locate and reproduce historic photographs of the features. For all of the features (including Feature 20) it is also recommended that historic research be undertaken and a historical narrative completed. Such a document was not required as part of the initial recordation. It is also recommended that Feature 20, a dugout structure of yet unknown origin or function, be excavated by professionally accepted archaeological standards in order to establish the feature's size, function, temporal parameters, construction techniques and its relationship to the historic Castle Gate Mine Site.

It is proposed that the report be presented to the Division of State History on archivally stable paper and suitably bound. The large format archival prints will be prepared as contact prints set on archival cardstock and negatives placed in archival sleeves. The deliverables will include two copies of the report and two copies of the photographs (only one negative of each photograph).

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This effort is being undertaken by Cypress Plateau for its recognition of the historical significance of the Castle Gate Mine Site as well as its obligation under Utah State Law. If you have questions concerning the project or this proposal, please call UDOGM at their offices in Salt Lake City at (801) 359-3940 or Ben Grimes at Cypress Plateau in Price at (801) 637-2875. We look forward to working with you in this effort to document and interpret significant parts of Utah's historical heritage.

Sincerely,



Michael R. Polk  
Principal Archaeologist

attachment

Table 1. Features located at site 42Cb1000 during 1994 and 1995 inventories.

Feature	Description	C/N*	Feature #	Description	C/N*
1	Castle Gate Mine No. 2 Portal	C	34	Pipes embedded in Sandstone	N
2	Castle Gate Mine No. 4 Portal	N	35	Brick and Mortar Remnants	N
3	Road Bridge	C	36	Dugout Structural Remnant	N
4	Drainage Pipe	N	37	Arched Rock Alignment	N
5	Railroad Bed	C	38	Rock Alignment	N
6	Portal, Short Tunnel, East End	N	39	Castle Gate Cemetery	C
7	Portal, Short Tunnel, West End	N	40	Cemetery Perimeter Fence/line	C
8	Portal, Long Tunnel, East End	N	41	Cemetery Turnstile Entrance	C
9	Rock Retaining Wall	N	42	Cemetery Gate Entrance	C
10	Portal, Long Tunnel, West End	C	43	Mine Portal (Air Intake)	N
11	Railroad Bridge Footing	N	44	Mine Portal (Exhaust)	N
12	Railroad Maintenance Road	N	45	Stone Foundation	N
13	Suspended Water Pipe	C	46	Dugout Coop	C
14	Fence Remnant	N	47	Dugout	C
15	Possible Water Tower Remnant	N	48	Stone-Lined Culvert	C
16	Concrete and Steel Pad (east)	N	49	Culvert	N
17	Concrete and Steel Pad (west)	N	50	Rock Wall Alignment	N
18	Corrals	N	51	Concrete Curbing	N
19	Shed	N	52	Foundation Segment	N
20	Dugout Structure	C	53	Retaining Wall	N
21	Fence Remnant at Dugout	N	54	Debris Pile	N
22	Graffiti Panel #1	N	55	Debris and Wire Fence	N
23	Graffiti Panel #2	N	56	Railroad Culvert	C
24	Fence Remnant	N	57	Ditch	N
25	Concrete Pad	N	58	Concrete Box Culvert	N
26	Rock Wall Alignment	N	59	Coal Chute Ramp	N
27	Concrete Wall Remnant	N	60	Sandstone Notch	N
28	Depression	N	61	Cut Sandstone Abutment	C
29	Graffiti Panel #3	N	62	Cut Sandstone Retaining Wall	N
30	Graffiti Panel #4	N	63	Collapsed tunnel Entrance	C
31	Quarried boulder	C	64	Ventilation Shaft Opening	C
32	Sandstone block Concentration	C	65	Cut Sandstone Blocks	C
33	Graffiti panel #5	N			

\*C/N Contributing/Noncontributing to the NRHP eligibility of the site as a whole