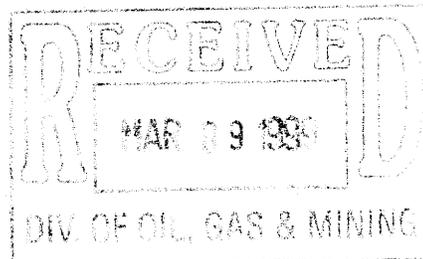




Willow Creek Mine
847 Northwest Highway 191
Helper, Utah 84526
(435) 472-0475
Fax: (435) 472-4780

March 8, 1999

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



Copy Joe

Re: Barn Canyon Ventilation, Response to September 16, 1998 Technical Analysis, Cyprus Plateau Mining Corporation, Willow Creek Mine, AC7/007/038-98B, File #2, Carbon County, Utah

Dear Ms. Grubaugh-Littig:

Cyprus Plateau Mining Corporation (CPMC) is herewith submitting modifications to the Willow Creek Mine Permit addressing the Division's September 16, 1998 findings. CPMC and its consultant made their best attempt to keep this submittal germane to the aforementioned deficiencies. This was a very onerous undertaking due to the number of subsequent permit amendments submitted in 1998.

This submittal addresses only those issues related to the Barn Canyon Ventilation Facility. Previous redline and strikeout text for which no comments were made by the Division have been incorporated or removed, respectively. The redline and strikeout text which now appears in the document is in direct response to the September 16, 1998 Technical Analysis. To assist in your review, we have also provided a document which summarizes the response to each comment in the Technical Analysis.

The Division will notice that, on the subsidence and mine maps, the subsidence boundary and/or projected mine workings fall outside the Willow Creek permit area in some locations. These maps are presented as is to show future mine plans with the caveat stating that no mining will take place outside of the permit area without first obtaining the appropriate permit and lease modifications.

Additionally, when the Division reviews the Surface Facilities Map (Map 18B), it should understand that this submittal of Map 18B is provided for inclusion of the Barn Canyon Ventilation Facilities and associated primary access road into the Willow Creek Mine surface facilities. Therefore, there may be minor errors on the map relating to other Willow Creek facilities that will be corrected with CPMC's April 15, 1999 submittal addressing the as-built conditions following construction of the Willow Creek Mine.

Ms. Pamela Grubaugh-Littig
March 8, 1999
Page 2

CPMC appreciates the Division's patience and understanding regarding its outstanding permit modifications and wants to assure the Division that it is doing everything possible to address all outstanding issues in as timely a fashion as possible. CPMC has contracted with EarthFax Engineering, Inc. to assist them with this endeavor; however, notwithstanding EarthFax's assistance, their available manpower, and familiarity of the site, time is still becoming a constraint to meeting all of the Division's and CPMC's schedules. Nonetheless, we remain committed to meeting schedules to the extent possible.

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

Sincerely,

A handwritten signature in cursive script that reads "Johnny Miller for".

Johnny Pappas
Sr. Environmental Engineer

Enclosures

APPLICATION FOR PERMIT PROCESSING

Permit Change <input checked="" type="checkbox"/>	New Permit <input type="checkbox"/>	Renewal <input type="checkbox"/>	Transfer <input type="checkbox"/>	Exploration <input type="checkbox"/>	Bond Release <input type="checkbox"/>	Permit Number: ACT/007/038
Title of Proposal: Barn Canyon Shaft Ventilation Facility						Mine: Willow Creek Mine
						Permittee: Cyprus Plateau Mining Corp.

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

Response to Division Technical Analyses ACT/007/038-98B, File #2

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? _____ acres Disturbed Area? 2.34 acres <input checked="" type="checkbox"/> increase <input 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 type="checkbox"/> Yes	<input checked="" 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 type="checkbox"/> Yes	<input checked="" 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 R2P??)
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input checked="" type="checkbox"/> Yes	<input 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

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)

John Pappas - Johnny Pappas - Sr. Env. Engineer - 3/5/99
Signed - Name - Position - Date

Subscribed and sworn to before me this 8 day of May, 19 99.

Jackie D. Bogdian
Notary Public
3-15-2001
My Commission Expires: 3-15-2001
Attest: STATE OF UT COUNTY OF CARBON



Received by Oil, Gas & Mining

ASSIGNED TRACKING NUMBER

Application for Permit Change Detailed Schedule of Changes to the Permit

Title of Change: Response to Technical Analysis of September 16, 1998 for Barn Canyon Ventilation Facility, ACT/007/038-98B	Permit Number: ACT/007/038
	Mine: Willow Creek Mine
	Permittee: Cyprus 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 change. 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 exiting 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	Section 3.2, Pages 3.2-4, 19a, and 27b
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Section 3.7, Pages 3.7-1 through 3, 6 through 11, 13, 26, 28, and 96 through 98
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Section 4.2, Pages 4.2-1 through 9
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Section 4.3, Pages 4.3-1 through 18
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Section 4.5, Pages 4.5-1 through 19, 24, 27 through 31, 33 through 38, 40 through 51, 54 through 61, 63, 65 through 69, 74, and 76 through 79
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Section 4.7, Pages 4.7-1 through 12, 16, and 20 through 39
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Section 5.4, Pages 5.4-1 through 3, 5, 7 through 9, 11 through 12, and 14 through 18
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Section 5.4, Pages 4 (Figure 5.4-1), 6 (Figure 5.4-2), 10 (Figure 5.4-3), and 13 (Table 5.4-1)
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Section 5.5, Pages 5.5-1 through 4
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Exhibit 22
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Exhibit 22, Map 1
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Maps 19A, B, C and D
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Map 20
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Maps 31A & B
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Maps 32A & B
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Map 33
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Map 18B
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Bond Estimate for Barn Canyon (Appendix F, Exhibit 17)
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	

March 9, 1999

