

**PLATEAU
MINING
CORPORATION**

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

An affiliate of **RAG**

September 12, 2001

Mr. Daron R. Haddock
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Laconid
2/007/038
SR01A-1

Re: Revisions to Exhibit 20, Response to Technical Analysis, Plateau Mining Corporation, Willow Creek Mine, C/007/038-SR01A, Carbon County, Utah

Dear Mr. Haddock:

Plateau Mining Corporation (PMC) is submitting its response to the Division's April 2001 Technical Analysis regarding PMC's proposed post mining land use change from grazing and wildlife to recreational use supported by a permanent road.

PMC tried to make this amendment application as simple as possible by taking the currently approved Crandall Canyon reclamation plan and adding a road. The same practices used in the approved plan were used in this application.

PMC uses the prior technical analyses as a tool during its permitting actions. Often times a technical analysis will be reviewed to see how a certain permitting action was analyzed, so that it can be properly addressed. However, this and recent permitting actions are bringing into question the worthiness of the Division's technical analysis document as a permitting tool.

The findings identified by the Division are presented below along with a brief response by PMC.

R645-300-133.100, *Correct minor typographical errors on Exhibit 3.7-7B and 3.7-7C so they are complete and accurate.*

PMC believes that it has properly addressed any typographical errors on the mentioned exhibits.

R645-301-112.600, *Update the text in Section 2.1.2.4 (Surface and Mineral Ownership) and the Regional Surface Ownership Map, (Map 1) to include Reed L. Martineau, Esq., and to delete Blackhawk Coal Co.*

PMC has made the appropriate modifications now that the real estate agreement is finalized. See Appendix 3.7V for proof of ownership.

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R645-301-113.300, *Update the text in Exhibit 2, Volume 8.*

The information currently in Exhibit 2, Volume 8 is up-to-date. A review of PMC's files show that no notices of violations have been issued to PMC since NOV 98-46-3-2 was issued on October 19, 1998. The table presenting the NOVs should show the 1998 violation on top instead of where it is on the fourth row.

R645-300-121.100, *Update Exhibit 3, Volume 8, with an Affidavit of Publication.*

The public notice started on March 1 and ended on March 22. A copy of the affidavit was sent to the Division on April 13. However, a copy of the affidavit is included for addition to Exhibit 3, Volume 8.

R645-301-341.250, *The application needs to include the woody plant density success standards discussed in this analysis.*

The woody plant density success standard for Crandall Canyon added to the amendment states that the desired success standard for the vegetation community will be set at 800 woody plants per acre, composed of no more than about 250 conifers per acre and the rest should be shrubs or other kinds of trees. The riparian area woody plant density success standard will be set a 400 per acre. After further consultation with the Division, the Division of Wildlife Resources, and upon the land owner's request, the woody plant density for the leach field will be set at 0 per acre.

R645-301-341.250, *The statement in Section 3.7-5(3)(9) that the applicant will meet diversity requirements for each of the reclaimed areas except the riparian area needs to be modified. While it is not necessary to meet revegetation standards in the channel, it is necessary to met them in adjacent areas which includes the riparian area.*

The statement has been removed.

R645-301-358, *There may be some practical ways to enhance wildlife habitat that are not discussed in the application. The applicant needs to investigate these and include them in the plan if they meet the criteria for the best technology currently available.*

PMC and representatives from the Division met at Crandall Canyon to evaluate possible alternatives, but after the Division representatives observed the existing ephemeral stream conditions it was determined that the proposed and previously approved (1996) design is the best alternative.

It should be mentioned that the main channel design is exactly the same as the Division approved in 1996. The only major change to this amendment is a permanent road is left for future postmining recreational land use which required the appropriate runoff control and conveyance structures.

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R645-301-413.300, *The applicant needs to submit information to comply with R645-301-413.300. This information needs to show that the proposed land use is a higher and better use and discuss the likelihood of achieving the use and whether it is compatible with local land use regulations.*

The initial submittal has a letter from Mr. Reed Martineau (Appendix 3.7V) expressing his desire for a permanent road to remain postmining for access to the property. With this submission there is another letter from Mr. Reed Martineau (Appendix 3.7V) discussing the property use for family related recreational uses, and his desire to leave the existing contour and ground cover in the leach field area as it exists. Mr. Martineau further stated that upon final bond release of the leach field area, he will accept maintenance of the roadway.

Also as stated in Mr. Martineau's first letter, dated October 19, 2000, a permanent road is required in order for Mr. Martineau to be able to obtain necessary local governmental approval for improvements to be made and uses to be carried on at the property.

R645-301-414, *The application includes a proposal to change the postmining land use which is a significant revision. The applicant needs to submit proof of publication.*

Refer to R645-300-121.100 above.

R645-301-521.131, R645-301-112.600, *The text and map showing surface ownership need to be updated to show the new land ownership information.*

This as with the previous deficiency dealing with ownership information has been updated now that the real estate agreement is finalized (Appendix 3.7V).

R645-301-527.240, R645-301-534.330, *The applicant must demonstrate the landowner is aware of their responsibility to repair and maintain road.*

As stated in Mr. Martineau's June 4, 2001 letter (Appendix 3.7V), "And upon becoming owner of the property and after release of the bond, we are willing to accept maintenance of the roadway." This verbiage was reviewed by the Division's Mr. Paul Baker.

R645-301-532, R645-301-731.121, *Demonstrate a true evaluation of whether "natural stream corridor restoration" practices are economically feasible at the site.*

Refer to R645-301-358 above. As stated previously, following the April 19 meeting the Division technical staff determined that the existing approved channel design is the best approach.

R645-301,542.310, *Exhibits 3.7-7A, 7B, 7C, and 7D address numerous requirements within the same four maps. The analysis below raises several concerns which are relative to the accuracy of some.*

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These are specifically addressed within the cross section analysis as well as one of the plan view drawings. Exhibit 3.7-7A and 7B do not accurately represent the current field conditions in Crandall Canyon, starting 140 feet NW of the propane tank foundations and ending in the extreme upper end of the disturbance. The road in this area has been reclaimed, and the maps indicate that same still exists as a portion of reclamation road R-1. Exhibit 3.7-7D, cross-section G-G' depicts the "operational" ancillary road A-1 as still being in place. The cross section lies in the area which was reclaimed by AMAX Coal Company in 1990 or 1991. No final reclamation contours, as they currently exist is shown. None of the cross sections shown on Exhibit 3.7-7D show a "pre-land development" surface contour. It is not known if the permittee is able to obtain that information due to man's utilization and development of the Crandall Canyon area long before SMCRA. Without this information, it is difficult to determine if the meeting of approximate original contour requirements can be effectively accomplished. The permittee must submit revised Exhibits 3.7-7A, 7B, and 7D (cross section G-G') such that field conditions in the upper canyon are accurately reflected.

The Exhibits are presented to depict a travelable road through the area to accommodate Mr. Martineau. The road is to be reestablished, except through the immediate leach field area. Once the Phase III bond release for the immediate leach field area and access is authorized, the road will be extended through the area and connect with the existing jeep road.

The pre-land development surface contour cross sections are not presented because they were not included in the 1996 approval, nor were they on any previous approvals. Review of the 1996 approved reclamation plan will show that only the operational and reclamation cross-sections are presented.

R645-301-542.600, R645-301-542.630, *Describe through illustration or narrative, how the Topsoil Stockpiles will be accessed, and if any additional reclamation will occur in those areas.*

Access to the topsoil stockpiles would be along the same route used during the placement of the soil material. Access to the upper topsoil pile (Stockpile No.2) will be down the travel corridor the veers off of the primary road P-1, and access to old exploration road. Access to the lower topsoil pile (Stockpile No.1) would be along the travel corridor show on Exhibit 3.7-7C, which is also used by PacifiCorp Lines and Services as access to their utilities.

Access to the topsoil stockpiles would probably receive minor, if any, reclamation work due to other access requirements by other entities. Sediment control structures such as strawbales and/or silt fencing will be installed within the ephemeral drainage downstream from where equipment will be crossing. The re-contoured topography shown on Exhibit 3.7-7C is the proposed reclamation surface. However, the permittee has created an insert of Exhibit 3.7-7C and incorporated it onto Exhibit 3.7-7F, which shows the reclamation treatment areas.

R645-301-746.220, *Consistently and accurately outline which cut-slopes are going to be reclaimed.*

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Also, if cut-slopes are to be reclaimed they need to be illustrated as existing within the Disturbed Area Boundary.

The cutslope delineation shown on Exhibits 3.7-7A, 7B, and 7C depict where the existing cutslopes are located and their extent. This information is presented in the same manner as the presently approved reclamation plan. The red line paralleling the disturbed area boundary is provided to show where the cutslopes are. The cross sections depict the extent of the existing cutslopes and to which extent the cutslopes will be reclaimed.

Areas where backfilling and grading are not reflected on the cross sections is due to the primary road siting (A-A' and G-G') and where it does not show complete backfilling along C-C' is due to the natural rock outcrop. Cross section D-D' shows complete backfilling of the cutslope. The backfilling and grading plan tried to take into account natural rock outcrops during the design to create an undulated reclamation surface edge. Exhibit 3.7-7B has been revised to show PRCS-2 cutslope that may remain.

PMC hopes that it addressed or clarified the aforementioned findings, so that the permit amendment can be approved. However, should the Division have any questions or need additional information, please do not hesitate to contact me at (435) 472-4741.

Sincerely,



Johnny Pappas
Sr. Environmental Engineer

Enclosures

File: Willow Creek Mine-Crandall Canyon
Chrono: JP010901.ltr

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DIVISION OF
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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/007/038
Title of Proposal: Submittal of Revisions to the Permit Associated with Crandall Canyon						Mine: Willow Creek
						Permittee: Plateau Mining Corporation

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

Instructions: If you answer yes to any of the first 8 questions (gray), this may be a Significant Revision and require Public Notice. Any questions, please call a Permit Supervisor.

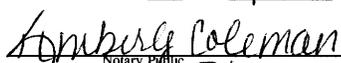
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application 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 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 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 checked="" type="checkbox"/> Yes	<input 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 checked="" type="checkbox"/> Yes	<input 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 to other entities?

Attach are 2 complete copies of the application for the _____ Office and 2 copies being delivered to 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.


 Signed - Name - Position Date
 John Ross - Sr. Env. Engineer - 9/13/01

Subscribed and sworn to before me this 13th day of September, 2001.


 Kimberly Coleman
 Notary Public
 Utah February 24, 2005
 COUNTY OF Carbon

My Commission Expires: _____
 Attest: STATE OF _____
 COUNTY OF _____


 KIMBERLY COLEMAN
 NOTARY PUBLIC - STATE OF UTAH
 141 SOUTH 500 EAST
 PRICE, UT 84601
 COMM. EXP. 2-24-2005

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 ASSIGNED TRACKING NUMBER

Application for Permit Change Detailed Schedule of Changes to the Permit

Title of Change: Submittal of Revisions to the Permit Associated with Crandall Canyon

Permit Number: C/007/038

Mine: Willow Creek

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 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	Exhibit 20, Chapter 3, Section 3.7, Pages 3.7-8, 3.7-27 thru 3.7-31, 3.7-41 and 3.7-49
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Exhibit 20, Appendix 3.7V, Reclamation Correspondence
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Exhibit 3, Public Notice and Hearing Notices and Documentation (Volume 4)
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Chapter 2, Section 2.1, Page 2.1-4
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Maps 1, 3.7-7A, 3.7-7B, 3.7-7C, 3.7-7F
<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	
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<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

Pagination will be adjusted to correspond with currently approved permit pagination upon submittal of clean copies.

September 13, 2001