



Canyon Fuel Company, LLC
Soldier Canyon Mine
P.O. Box 1029
Wellington, Utah 84542
(435) 637-6360 Fax: (435) 637-0108

November 13, 2001

Ms. Susan White
c/o Ms. Pamela Grubaugh-Littig
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Salt Lake City, UT 84114-5801

RE: Plans for Bat Survey, Dugout Canyon Mine, Canyon Fuel Company, LLC, C/007/039,
Carbon County, Utah

Dear Ms. White:

Enclosed please find a copy of the plans for a bat survey prepared by biologists Eric Holt and Greg Brown from JBR Environmental Consultants, Inc. Canyon Fuel Company, LLC, Dugout Canyon Mine intends to complete the bat survey as outlined in the plan prepared by JBR. We would appreciate your review of the attached plan and should you have questions or suggestions concerning the proposed plan will you please contact Vicky Miller at (435) 636-2869.

Sincerely yours,

David G. Spillman
Manager of Technical Services

cc: Vicky Miller
Chris Hansen

FAX PFO
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C/007/039
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DIVISION OF
OIL, GAS AND MINING

November 9, 2001

Canyon Fuel Company, LLC
PO Box 1029
Wellington, Utah 84542

Ms. Vicky Miller

On 1 November 2001, Greg Brown and I (JBR Biologists) joined you on a field visit of the Fish Creek Canyon area in order to evaluate the site for potential bat habitat and to discuss the potential for future bat surveys in the area. The Project Area is located in Carbon County, Utah, approximately 15 miles northeast of Wellington in the Book Cliffs area (Figure 1). It is our understanding that an evaluation of potential bat habitat, bat presence, species composition, and relative bat abundance in the area is required under an existing Utah Division of Oil, Gas, and Mining permit, due to the potential for subsidence in the area as a result of activities at Canyon Fuel Company's Dugout Mine operation.

Habitat Evaluation

The Project Area lies at 6980 – 8020 feet elevation and is characterized by steep sided canyon walls consisting of exposed sandstone rock outcrops. The vegetative community is dominated by various sized, mixed patches of pinyon, juniper, Douglas fir, and white fir (Figure 2). Shrub species include mountain mahogany, maple, and sagebrush. As a function of the vast expanses of rock outcrops and associated fissures and cracks, the Project Area appears to contain a virtually unlimited potential for day and night bat roosting sites. Limited snag habitat is also available. No known caves, open mine shafts, adits, or other man made structures that might provide additional habitat are known to exist in the Project Area. Perhaps the only habitat feature limiting bat presence within the Project Area is the availability of water for drinking and foraging. At the time of our visit, Fish Creek was dry, as it likely is during the fall and winter of most years. However, other sources of water, in the form of stock ponds, are located within close (<1.25 miles) proximity of potential roost habitat (Figures 1 and 2).

Based on the presence of potential bat habitat and that fact that bats have been documented in at least one neighboring canyon, it is our conclusion that bats likely inhabit the project area and that additional techniques should be used to identify which species occur in the area and to attempt to estimate the relative numbers of bats in the area. We are thus proposing that JBR implement the following three survey techniques, as described, to gain a further understanding of the use of the Project Area by bats.

Mist Netting

JBR would conduct a single session of mist net sampling at each of 2 – 3 sample locations within or near the Project Area. Sampling would occur from approximately dusk to four hours after dusk. The first station would be located at one of the stockponds located on the plateau immediately above Fish Creek Canyon. The remaining 1-2 station(s) would be placed near Fish Creek at the bottom of the canyon. Mist netting would be completed in the spring of 2002 and all captured bats would be identified to species, measured, and notes taken on their reproductive status. The results of this effort would be summarized in a final report.

Structural Surveys

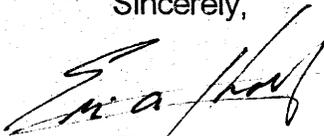
JBR would conduct structural surveys to better evaluate the potential for bats to use the area and to identify key habitat components or areas within the project area. These surveys would be done in conjunction with and prior to conducting mist net sampling. The results of these surveys would be summarized in the final report.

Bat Detector

In order to evaluate the presence of bat species that are not attracted to water sources, JBR would also likely utilize an ANABAT recorder (we are in the process of procuring this device and should have it before April 2002) to detect the potential presence and species composition of bats based on their vocalization. A single ANABAT station would be setup in conjunction with each of the mist net stations. The results of these surveys would also be summarized in the final report.

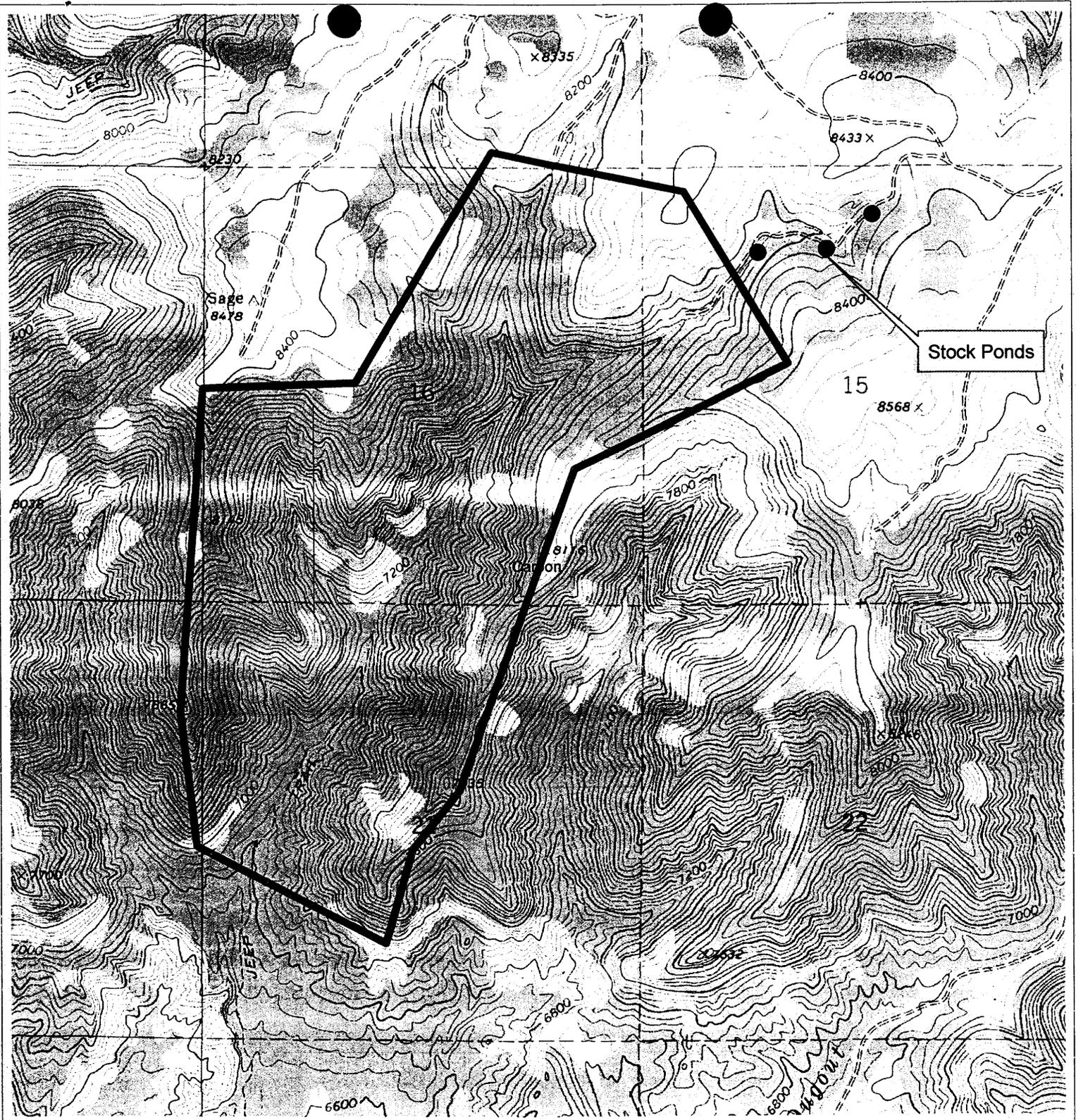
If you have any further question, please contact me at 801-943-4144 (eholt@jbr-env.com). JBR looks forward to assisting Canyon Fuel Company in meeting its permit requirement to evaluate and inventory bat habitat and presence in the Fish Creek area.

Sincerely,



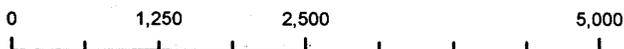
Eric A. Holt
Wildlife Biologist

cc: Dave Worley (JBR bat specialist - Reno office)



Base: Pine Canyon, UT (1972) - 1:24,000 USGS

T13S R12E Section 16



1:19,613

CANYON FUEL COMPANY Dugout Mine Bat Surveys

Figure 1. Project Area

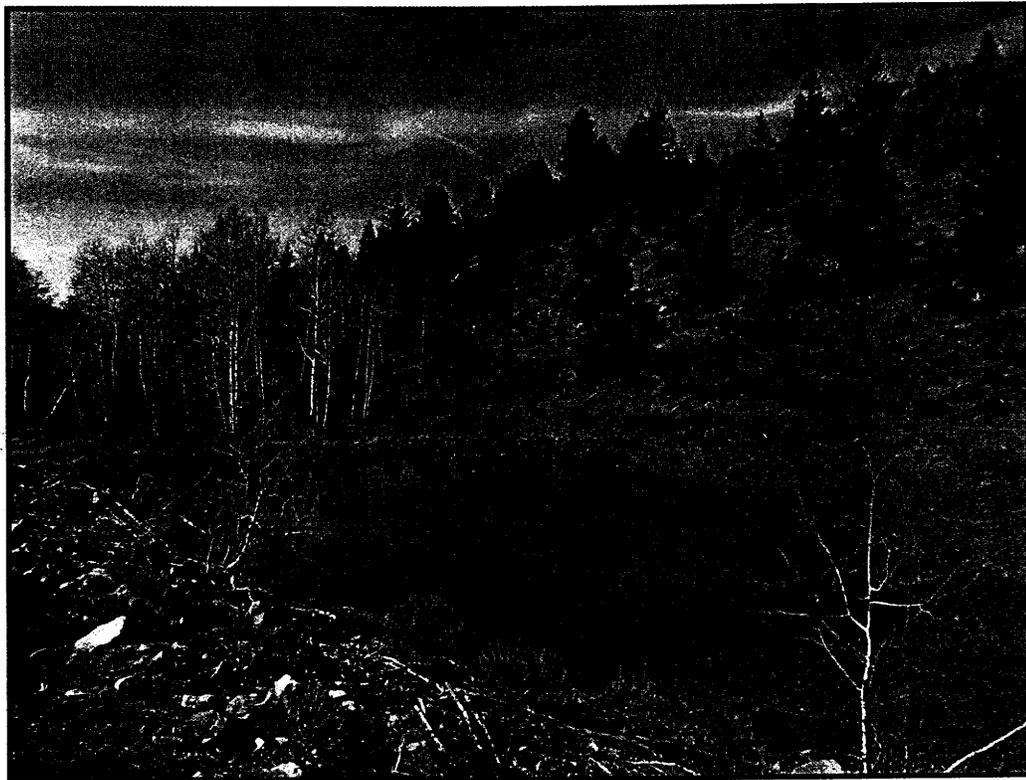
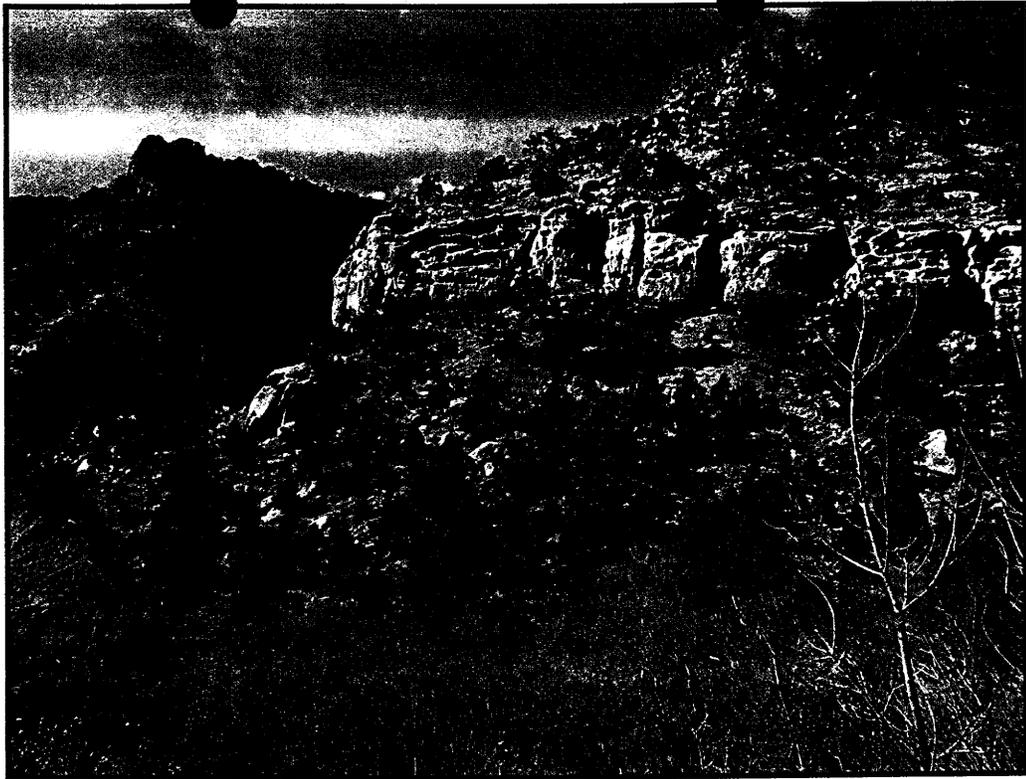
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environmental consultants, inc.
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CANYON FUEL COMPANY Dugout Mine Bat Surveys

Figure 2. Photos of the Project Area's vegetation and topography (Top) and of a stock pond located above Fish Creek Canyon (Bottom).

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