

August 9, 2004

Jim Dykman, Cultural Resources Coordinator
DCED - State History Division
300 Rio Grande
Salt Lake City, Utah 84111

Re: SHPO Clearance for SITLA Lease Extension, Canyon Fuel Company, LLC, Dugout, C/007/0039, #1915, Outgoing File

Dear Mr. Dykman:

The Division of Oil, Gas and Mining is currently reviewing the SITLA Lease Extension project for the Dugout Mine. This proposed project would increase the permit area by 2,360 acres, but would not add acreage for facilities. Subsidence may occur due to longwall mining.

The Dugout Mine is in Carbon County, Utah. The 7.5 Minute Quadrangle USGS map that covers the permit area is Mount Bartles. The proposed area includes Township 13 South and Range 13 East with Sections 17, 20, 21, 28, 29, and 30. The Division has included a map showing the location of the proposed area.

The Division is requesting concurrence with SHPO for the proposed project. The following provides pertinent information that may be useful during the consultation process. The list is not inclusive of all surveys of the area, but includes pertinent or current surveys:

- Senulis J (May 2004) An Intensive Cultural Resource Survey And Inventory Of The 2004 Dugout Canyon Mine Exploration Drill Holes And Access Roads. (U04SC440p; SPUT-474).
Findings/Recommendation: Class III survey showed no cultural resources within the survey area. The drill project will not affect cultural resources and should receive archeological clearance without stipulation.
- Senulis J (April 2004) Dugout Canyon Permit Extension. (U04SC0326).
Findings/Recommendation: Class I review described surveys conducted near, but not within the proposed area. There are five sites near the proposed area, but none are eligible for the National Register Of Historic Places (NRHP). Further surveys of the area will unlikely provide positive results for eligible cultural or historic findings. The topography within the proposed area is steep with narrow canyons, which was not favored by prehistoric peoples. Mining related

Page 2
Jim Dykman
August 9, 2004

operations were conducted in these canyons, but sites were not recommended for NRHP. The project does not include surface disturbance and should receive archeological clearance without stipulation.

Although the Permittee has conducted many cultural/historical evaluations over the years, there are only two ground surveys (Senco-Phenix, June 2001 and May 2004) conducted within the proposed area. Both surveys were relatively limited in size and not far into the permit boundary (2000' east of the permit boundary). Regardless, both surveys show that there are no sites recommended for the NRHP within the proposed area.

Jerriann Ernstsen (Division) discussed the nature of the project with Kenny Wintch (SITLA archeologist; April 13, 14, and July 15, 2004). She stressed that there are no plans for surface disturbance except possible surface disturbances caused by subsidence. Mr. Wintch supported the consultant's recommendation of no further surveys. The Division assesses that the Permittee should not conduct additional surveys or evaluations for this amendment because:

- No planned surface disturbances for facilities.
- No known NRHP eligible sites.
- Little probability of unknown NRHP eligible sites.

The Division supports a finding of "no effect" to historical resources and that the permit should receive clearance and seeks your concurrence. If you have any questions about this project, please call me at (801) 538-5268 or Jerriann Ernstsen at (801) 538-5214.

Sincerely,

Pam Grubaugh-Littig
Permit Supervisor

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cc: Price Field Office
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