



STATE OF
COLORADO

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TR-147 Adequacy Response

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Cc: "Welt, Kathy" <KWelt@archrsc.com>

Wed, Feb 9, 2022 at 10:49 AM

Leigh,

Please find attached documents for the Cultural and Historic Resources Information needed for TR-147 Adequacy review.

Thank you,

Nicki Poulos

Environmental Engineer

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West Elk Mine

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2 attachments



Cultural Resource Survey.pdf
10969K



Mountain Coal #TR-147 SHPO concurrence letter.pdf

205K



Consultants in Natural Resources and the Environment

Class II Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision #TR-147 Gunnison County, Colorado

Prepared for—

Mountain Coal Company, LLC
West Elk Mine
5174 Highway 133
Somerset, Colorado 81434

Submitted to—

Grand Mesa, Uncompahgre, and Gunnison National Forests
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Prepared under the supervision of—

Kathy Croll, Principal Investigator

Permit No. CAN715HR
SHPO Report ID GN.FS.R186
GMUG FS# R2019020408005
ERO Project No. 10701

July 2019

For Official Use Only: Disclosure of site locations prohibited (43 CFR 7.18)

Colorado Historical Society - Office of Archaeology and Historic Preservation
Colorado Cultural Resource Survey
Cultural Resource Survey Management Information Form

I. PROJECT SIZE

Total federal acres in project	1,670	Total federal acres surveyed	770
Total state acres in project		Total state acres surveyed	
Total private acres in project		Total private acres surveyed	
Total other acres in project		Total other acres surveyed	

II. PROJECT LOCATION

County: Gunnison

USGS Quad Map: Minnesota Pass and Somerset, Colorado

Principal Meridian: 6th

Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>NE</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>35</u>		1/4 of	<u>NW</u>	1/4 of	<u>NW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>SW</u>	1/4 of	<u>NW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>NW</u>	1/4 of	<u>NE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>NE</u>	1/4 of	<u>NE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>SE</u>	1/4 of	<u>NE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>NE</u>	1/4 of	<u>NW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>NW</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>NW</u>	1/4 of	<u>NW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>SE</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>SW</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>NW</u>	1/4 of	<u>SW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>NE</u>	1/4 of	<u>SW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>SE</u>	1/4 of	<u>SW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>27</u>		1/4 of	<u>SW</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>SW</u>	1/4 of	<u>NE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>SW</u>	1/4 of	<u>NW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>NE</u>	1/4 of	<u>NE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>NW</u>	1/4 of	<u>NE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>NW</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>SE</u>	1/4 of	<u>SW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>SW</u>	1/4 of	<u>SW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>34</u>		1/4 of	<u>SE</u>	1/4 of	<u>NW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>NE</u>	1/4 of	<u>SW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>35</u>		1/4 of	<u>SW</u>	1/4 of	<u>NW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>SE</u>	1/4 of	<u>NW</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>SE</u>	1/4 of	<u>NE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>SW</u>	1/4 of	<u>NE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>NE</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>SE</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>SW</u>	1/4 of	<u>SE</u>	1/4
Township	<u>13S</u>	Range	<u>90W</u>	Section	<u>33</u>		1/4 of	<u>NW</u>	1/4 of	<u>SW</u>	1/4

II. PROJECT LOCATION (CONTINUED)

Township	14S	Range	90W	Section	2	1/4 of	NE	1/4 of	NE	1/4
Township	13S	Range	90W	Section	34	1/4 of	SW	1/4 of	SW	1/4
Township	14S	Range	90W	Section	1	1/4 of	NE	1/4 of	NW	1/4
Township	14S	Range	90W	Section	2	1/4 of	NW	1/4 of	NW	1/4
Township	14S	Range	90W	Section	2	1/4 of	NE	1/4 of	NW	1/4
Township	14S	Range	90W	Section	2	1/4 of	SE	1/4 of	NW	1/4
Township	13S	Range	90W	Section	36	1/4 of	SW	1/4 of	SW	1/4
Township	14S	Range	90W	Section	2	1/4 of	NW	1/4 of	NE	1/4
Township	13S	Range	90W	Section	36	1/4 of	SE	1/4 of	SW	1/4
Township	14S	Range	90W	Section	2	1/4 of	SW	1/4 of	NE	1/4
Township	14S	Range	90W	Section	3	1/4 of	NW	1/4 of	NW	1/4
Township	14S	Range	90W	Section	3	1/4 of	NE	1/4 of	NW	1/4
Township	14S	Range	90W	Section	3	1/4 of	NW	1/4 of	NE	1/4
Township	14S	Range	90W	Section	3	1/4 of	NE	1/4 of	NE	1/4
Township	14S	Range	90W	Section	3	1/4 of	SE	1/4 of	NE	1/4
Township	14S	Range	90W	Section	2	1/4 of	SW	1/4 of	NW	1/4
Township	13S	Range	90W	Section	35	1/4 of	NW	1/4 of	SW	1/4
Township	13S	Range	90W	Section	35	1/4 of	SE	1/4 of	NW	1/4
Township	13S	Range	90W	Section	35	1/4 of	SW	1/4 of	NE	1/4
Township	13S	Range	90W	Section	35	1/4 of	SE	1/4 of	NE	1/4
Township	13S	Range	90W	Section	35	1/4 of	NW	1/4 of	SE	1/4
Township	13S	Range	90W	Section	35	1/4 of	NE	1/4 of	SE	1/4
Township	14S	Range	90W	Section	1	1/4 of	NW	1/4 of	NW	1/4
Township	13S	Range	90W	Section	35	1/4 of	SW	1/4 of	SE	1/4
Township	14S	Range	90W	Section	4	1/4 of	NE	1/4 of	NE	1/4
Township	13S	Range	90W	Section	35	1/4 of	NE	1/4 of	SW	1/4
Township	13S	Range	90W	Section	35	1/4 of	SE	1/4 of	SW	1/4
Township	13S	Range	90W	Section	35	1/4 of	SW	1/4 of	SW	1/4
Township	13S	Range	90W	Section	36	1/4 of	SW	1/4 of	NW	1/4
Township	13S	Range	90W	Section	36	1/4 of	NW	1/4 of	SW	1/4
Township	13S	Range	90W	Section	36	1/4 of	NE	1/4 of	SW	1/4
Township	13S	Range	90W	Section	35	1/4 of	SE	1/4 of	SE	1/4

III. SITES

Smithsonian Number	Resource Type				Eligibility						Management Recommendations						
	Prehistoric	Historic	Paleontological	Unknown	Eligible	Not Eligible	Need Data	Supporting Linear Segment	Non-supporting Linear Segment	Contributes to a District	No Further Work	Preserve / Avoid	Monitor	Test	Excavate	Archival Research	Other
5GN6494.1		X			X				X		X						
5GN6495.1		X				X					X						
5GN6496		X			X						X						
5GN6497		X				X					X						

IV. ISOLATED FINDS

Smithsonian Number	Resource Type			
	Prehistoric	Historic	Paleontological	Unknown
5GN6498		X		
5GN6499	X			
5GN6500		X		
5GN6501		X		

Abstract

Mountain Coal Company, LLC (Mountain Coal) contracted ERO Resources Corporation (ERO) to conduct a cultural resource survey for Mountain Coal's Sunset Trail Lease Modifications Permit Revision #PR-15 in Gunnison County, Colorado (project area). Mountain Coal is proposing new access roads for new mine ventilation boreholes. ERO, in cooperation with Mountain Coal, developed a block survey area that will facilitate design modifications and consider the effects of future work. To provide access to the borehole locations, Mountain Coal would construct new temporary roads that are to be reclaimed after completion of mining activities. Mountain Coal proposes construction of 10.18 miles of 14-foot-wide temporary roads and 77 mine ventilation borehole locations each with a 2-acre buffer. A larger area of potential effect (APE) of 1670 acres surrounding the access roads and MVB locations was established in order to provide Mountain Coal the ability to make design changes; most of this APE will not be impacted. ERO conducted Class II survey of the APE: 770 acres (46 percent) of the APE was surveyed; the remaining 900 acres (54 percent) were unsurveyable due to a combination of extremely steep slopes (greater than 30%), impenetrable vegetation that restricted or prevented access, and no ground visibility due to heavy vegetative cover. Because the project requires a federal permit from the Grand Mesa, Uncompahgre, and Gunnison National Forests, a cultural resource survey was conducted in compliance with Section 106 (54 United States Code (U.S.C.) §306108) of the National Historic Preservation Act (54 U.S.C. §300101 et seq.).

Within or overlapping the APE are two segments of newly recorded linear resources and two newly recorded historical resources. The Dry Fork Cow Camp (5GN6496) is recommended eligible for listing in the National Register of Historic Places (NRHP). One linear resource (5GN6494.1) is recommended non-supporting of the eligibility of the entire resource. The remaining two sites (5GN6495.1 and 5GN6497) are recommended not eligible for listing in the NRHP. Additionally, ERO documented four isolated finds, none of which are eligible for inclusion in the NRHP. No further work is necessary for all resources recommended not eligible. Proposed project activities will not occur near any of the documented resources such that all resources will be avoided regardless of NRHP eligibility. ERO recommends a determination of "no adverse effect to historic properties" pursuant to 36 CFR 800.5 of the National Historic Preservation Act.

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Class II Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision #TR-147 Gunnison County, Colorado

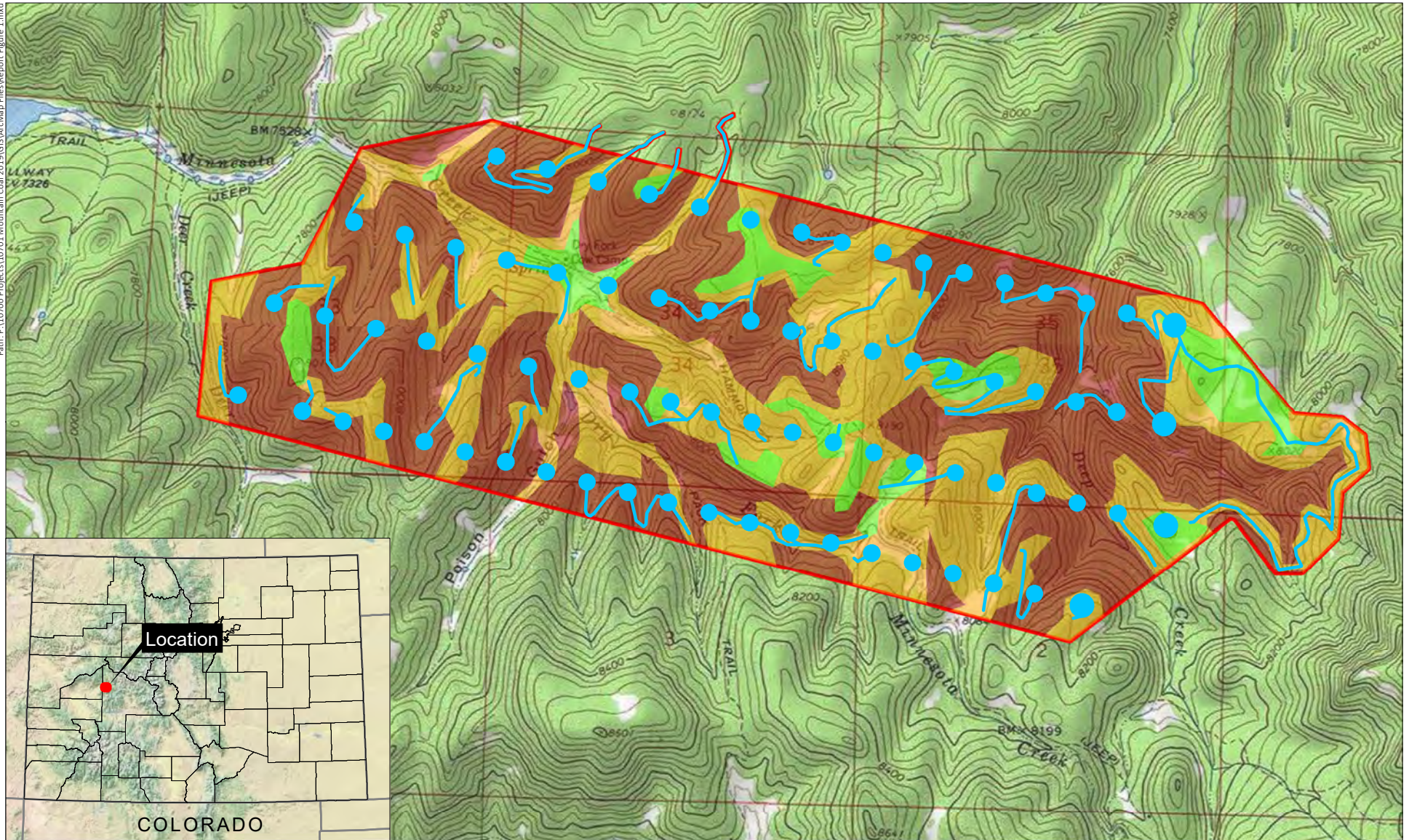
July 2019

Project Description

Mountain Coal Company, LLC (Mountain Coal) contracted ERO Resources Corporation (ERO) to conduct a cultural resource survey for Mountain Coal's Sunset Trail Lease Modifications Permit Revision #PR-15 in Gunnison County, Colorado (project area). Mountain Coal is proposing new access roads for new mine ventilation boreholes. ERO, in cooperation with Mountain Coal, developed a block survey area that will facilitate design modifications and consider the effects of future work. To provide access to the borehole locations, Mountain Coal would construct new temporary roads that are to be reclaimed after completion of mining activities. Mountain Coal proposes construction of 10.18 miles of 14-foot-wide temporary roads and 77 mine ventilation borehole (MVB) locations with a 2-acre buffer. A larger area of potential effect (APE) of 1670 acres surrounding the access roads and MVB locations was established in order to provide Mountain Coal the ability to make design changes; most of this APE will not be impacted. Because the project requires a federal permit from the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG), a cultural resource survey was conducted in compliance with Section 106 (54 United States Code (U.S.C.) §306108) of the National Historic Preservation Act (54 U.S.C. §300101 et seq.).

The area of potential effect (APE) is defined as 1,670 acres of lands managed by GMUG. ERO conducted Class II survey of the APE: 770 acres (46 percent) of the APE were surveyed; the remaining 900 acres (54 percent) were unsurveyable due to a combination of extremely steep slopes (greater than 30%), impenetrable vegetation that restricted or prevented access, and no ground visibility due to heavy vegetative cover. For the 770 acres surveyed, 15-meter transect intervals were used in all open areas with ground visibility on less than 30% slopes (139 acres); and 30-meter transect intervals were used in areas with limited ground visibility on less than 30% slopes (631 acres). All proposed access roads and well pad locations were field checked and either surveyed or confirmed to be too steep or too heavily vegetated for survey.

The APE is located on the Minnesota Pass and Somerset, Colorado, 7.5-minute U.S. Geological Survey (USGS) quadrangles (Figure 1). The legal locations are Sections 27 and 33–36 of Township 13 South, Range 90 West, and Sections 1–4 of Township 14 South, Range 90 West in the 6th Principal Meridian. ERO archaeologists Kathy Croll, Matthew Howryla, Justin Batista conducted the cultural resource survey of the APE from June 10–14, 2019.



Class II Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM

Sections 1-4, T14S, R90W; 6th PM

USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)

Gunnison County, Colorado

0 1,000 2,000
 Feet
 1:24,000



- Proposed Access Road 5-13-19
- Proposed Drill Pad 5-13-19
- 30-m Transect Intervals
- 15-m Transect Intervals
- Slope/Veg Exclusion
- Area of Potential Effect

Figure 1
Project Location

Prepared for: Mountain Coal Company, LLC
 File: Report Figure 1.mxd (MH)
 July 3, 2019

ERO
 ERO Resources Corp.

Natural Environment

Contained within the Southern Rocky Mountains geological province, the APE is located along the north and south sides of Minnesota Creek and on the east and west sides of Deep Creek and Poison Gulch. Mount Gunnison lies to the southeast. The area is characterized by steep slopes and deep drainages with thick vegetation (Figure 2). The elevation of the APE ranges from 7,300 to 8,200 feet above sea level (asl). The ground visibility is heavily obscured by thick vegetation and is approximately 10 percent even in the best of locations; the vast majority of the project area afforded no ground visibility. The surface geology consists of the Mesa Verde Formation with major coalbeds (Tweto 1979). Soil data in the APE is based on the Web Soil Survey data compiled by the Natural Resources Conservation Service (NRCS). The soil series represented within the APE are presented in Table 1 in order of dominance (NRCS 2019). The vegetation community in the APE is classified as montane and includes aspen, fir, spruce, Gambel oak, fern, wild rose bush, and other low forbs. Fauna includes coyotes, cottontails, foxes, bobcats, rodents, and various bird species. Mule deer, black bear, and elk are also abundant.



Figure 2. Overview of project area looking into Minnesota Creek. View is to the south.

Table 1. Soil series in the APE.

Soil Series	Slope Range	Description
Herm-Fughes-Kolob family complex	25–40%	Consists of deep well-drained soils formed by interbedded alluvium derived from sandstone and shale or interbedded residuum. These soils are found on mountains.
Shawa-Sandia family-Kolob family complex	5–40%	Consists of deep well-drained loam followed by cobbly loam formed by interbedded colluvium or residuum derived from sandstone or shale. These soils are found on mountain slopes and benches.
Taterheap-Papaspila complex	5–40%	Consists of deep well-drained loam followed by clay loam and sandy loam formed by colluvium derived from rhyolite, andesite, or breccia and weathered residuum. These soils are found on mesas, mountains, and benches.
Wetopa-Wesdy complex	5–65%	Consists of deep well-drained soils formed by colluvium of sandstone and shale. These soils are found on mountain slopes.
Cryochrepts-Cryoborolls Rubble land complex	15–90%	Consists of shallow well-drained soils formed by colluvium or residuum derived from basalt, tuff breccia, andesite, or rhyolite. These soils are found on mesas, canyons, and mountains.
Coberly-Falcon dry complex	0–15%	Consists of shallow well-drained soils derived from residuum of weathered sandstone. These soils are found on benches, mesas, and ridges.
Taterheap-Papaspila complex	40–65%	Consists of deep well-drained loam followed by clay loam and sandy loam formed by colluvium derived from rhyolite, andesite, or breccia and weathered residuum. These soils are found on mesas, mountains, and benches.
Coberly-Falcon, dry complex	0–15%	Consists of well drained fine sandy loam atop unweathered bedrock. These soils are found on benches, ridges, and mesas.

Cultural Overview

Given the small size of the project area, an extensive cultural overview is not warranted for this project. The reader should refer to *Colorado Prehistory: A Context for the Northern Colorado River Basin* (Reed and Metcalf 1999) for a complete overview. The temporal framework for the northern Colorado River Basin is divided into five major prehistoric and historic stages: Paleoindian (13400 to 7500 B.P.), Archaic (ca. 7500 to 2000 B.P.), Late Prehistoric (2400 to 700 B.P.), Protohistoric (700 to 200 B.P.), and Historic (200 to 50 B.P.).

The Paleoindian stage is primarily divided into four traditions distinguished by four projectile point styles and, to a lesser degree, changes in mobility and subsistence patterns. The four traditions are Clovis (13400 to 12500 B.P.) and/or Goshen (13000 to 12700 B.P.); Folsom (12800 to 11500 B.P.); Plano, best represented from sites on the Great Plains (11500 to 7500 B.P.) and the Cody Complex; and Foothills/Mountain (ca. 10000 to 7500 B.P.) (Frison 1991). Expected Paleoindian types for western Colorado (Colorado Plateau) include Great Basin Stemmed, Concave Base Stemmed, and Angostura (Pitblado 1999). Overall, the styles include partially fluted lanceolate projectile points (Clovis) to fully fluted lanceolate projectile points (Folsom) and stemmed to lanceolate Plano types. Paleoindian hunter-gatherers were highly mobile, leaving few cultural imprints on the landscape. Subsistence strategies focused initially on big game, which included now-extinct megafauna such as mammoth and *Bison antiquus*, and by the Plano and Foothills/Mountain Traditions; the subsistence strategy approximated

that of the Archaic period and a more broad-spectrum pattern. Nearly all of the dated Paleoindian components in the northern Colorado Basin occur near the headwaters of the Colorado River near Middle Park and the Indian Peaks (Pitblado 1999).

The Archaic stage (7500 to 2000 B.P.) is a temporally extensive period marked by broad-spectrum hunting and gathering. Aside from the decreased emphasis on large game and an increased emphasis on the gathering and processing of vegetal food, as evidenced by ground stone in the archaeological record, settlement strategies appear to have remained similar to that of the late Paleoindian stage, when "settling in" to the local landscape took place. Changes in lithic technology include a decrease in size and an increased diversity of projectile point styles to large corner- and side-notched types. Sites such as Yarmony (5EA799) demonstrate the use of semisubterranean architecture (Metcalf and Black 1991). Reed and Metcalf (1999) have divided the Archaic stage into four periods: Pioneer (8350 to 6450 B.P.), Settled (6450 to 4450 B.P.), Transitional (4450 to 2950 B.P.), and Terminal (2950 to 1950 B.P.). The other prominent chronology was developed by Buckles (1971) from work conducted under the auspices of the Ute Prehistory project on the Uncompahgre Plateau. Although dated, Buckles' work demonstrates nearly continuous occupation of the plateau and indicates *in situ* development. Similarities with the Oshara Tradition of northern New Mexico (Irwin-Williams 1973) are also evident, but it has been clearly demonstrated that the northern Colorado River Basin developed independently of this and other large-scale chronologies, including the Northwest Plains (Frison 1991), the western Great Plains of Colorado (Gilmore et al. 1999), and the northern Colorado Plateau (Schroedl 1976).

The Formative era (2400 to 700 B.P.) is a period when horticulture became a major subsistence focus in western Colorado. The Fremont practiced horticulture in far northwestern Colorado and into Utah, and evidence of Ancestral Puebloan use extends from southwestern Colorado but was of limited intensity and is restricted to the area of the Dolores River drainage. The Formative era saw the introduction of the bow and arrow and distinctive ceramic traditions, and structures generally became more permanent. The hunter-gatherer lifestyle is still recognized in the archaeological record for this period and may represent a cultural tradition separate from the Fremont and Ancestral Pueblo (Reed and Metcalf 1999).

For western Colorado, two Formative era traditions have been defined—Fremont and Ancestral Pueblo—and two other traditions have been proposed—Gateway and Aspen. The Fremont includes a number of variants, including the Uinta, San Rafael, Great Salt Lake, Sevier, and Parowan; others have reduced this number to just three variants: Fremont, Sevier, and Uinta Basin variants (Madsen 1979). Fremont occupation of western Colorado occurs significantly in three areas: western Montrose County, Glade Park, and the Douglas Creek/Dinosaur National Monument area (Reed and Metcalf 1999). Upland use of areas such as the Uncompahgre Plateau and Grand Mesa undoubtedly occurred and is recognized by the presence of projectile point styles such as Uinta side-notched and Rosegate corner-notched, although these styles occur ubiquitously throughout the Formative era and the general morphological types were widely adopted by other cultures. Fremont structures include free-standing masonry roomblocks, semisubterranean pithouses, and isolated granaries. The Ancestral Puebloan Tradition does not extend

very far north into the northern Colorado River Basin, and although Ancestral Puebloan ceramics are occasionally found in small amounts in the region, their presence is usually attributed to trade and not to actual occupation of the region (Reed and Metcalf 1999). The reader should refer to the *Southern Colorado Basin Context* (Lipe et al. 1999) for further information.

The ambiguity of assigning cultural affiliation to masonry habitation sites and to the occurrence of Ancestral Puebloan pottery, the occasional corn, and sites with small corner-notched projectile points in western Colorado attributable to either the Fremont Tradition or Ancestral Puebloan Tradition has not been lost on investigators. In response, Reed (1997) developed the Gateway Tradition (2400 to 800 B.P.) as a separate cultural entity distinctive from the Fremont and Ancestral Puebloan Traditions. Still far from accepted, the Gateway Tradition is characterized by limited reliance on horticulture and by small corner-notched projectile points such as the Rosegate series; the acquisition of ceramics from both the Fremont and Ancestral Puebloan, and the lack of ceramic production on their own; use of masonry habitation and possible pithouses over relatively short duration; the occurrence of storage features; and rock art with both Ancestral Puebloan and Fremont influence.

The definition of the Aspen Tradition is far less robust. The Aspen Tradition was developed in response to the many archaeological sites not assignable to any of the three aforementioned traditions. Reed and Metcalf do not list any cultural traits specific to the Aspen Tradition other than to state that it is the "taxonomic equivalent to the Gateway and Fremont traditions...and is a sort of parallel construct to the Uinta phase of the Wyoming Basin," with a near identical time span of 2400 to 700 B.P. (1999:141).

The Protohistoric stage (700 to 200 B.P.) begins with the end of horticultural subsistence practices of the Formative era and ends with the expulsion of the various Ute bands to reservations. The primary group to occupy western Colorado was the Numic-speaking Ute. Before contact with the Spanish in the early 1600s, the Ute were mobile hunters and gatherers who constructed wickiups for shelter, produced a particular ceramic tradition (Uncompahgre brown-ware), and crafted small side-notched (Desert) and unnotched triangular (Cottonwood) projectile points (Reed and Metcalf 1999).

Historic settlement of the western Colorado era occurred during the early 1800s with the arrival of government survey expeditions. Fur trappers and traders entered the area shortly after 1800. The Colorado Territory was established in 1861. With the relocation of the Ute to reservations in 1881 through the Brunot Treaty, Euro-American settlers were free to build towns, establish mining operations in the mountains, and later establish lumber extraction and mills. Land was cleared for crop cultivation, cattle ranchers moved into the area, and railroads were eventually built to move goods in and out of the region (Church et al. 2007). Gunnison County is named after Captain John Gunnison, who led a survey expedition through the region in 1853. Historically, the dominant industries in the region were mining and ranching. Many towns in Gunnison County started as mining towns, including nearby Somerset.

Methods

Historic Property Identification

This cultural resource survey provides compliance under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations under 36 CFR Part 800 by undertaking a “reasonable and good faith effort” to identify historic properties (defined as listed in or eligible for listing in the National Register of Historic Places (NRHP)) within the defined area of potential effect (APE). Identification and documentation standards conform to federal land managing agency requirements and secondly to guidelines provided by the State Historic Preservation Officer (SHPO). In doing so, the standards imposed by the *Secretary of the Interior for the Identification, Documentation, and Evaluation of Historic Properties* are also met. All personnel supervising survey and documentation are listed on applicable federal and state permits and meet or exceed the *Secretary of the Interior's Professional Qualification Standards* (36 CFR 61).

Historic properties may consist of buildings, structures, objects, or sites and can include districts, landscapes, and traditional cultural properties. The National Park Service has established an age criterion of 50 years for historic property evaluation and to be listed in the NRHP (but see criteria consideration (g) for an exception to the age guideline); in some instances, a federal agency will establish the age criterion at 45 years to account for the duration of the undertaking.

Cultural resources not identified in the Office of Archaeology and Historic Preservation (OAHP) file search and historical records were identified during pedestrian survey. The project attempted to use standard pedestrian survey transects spaced 15 to 20 meters (m) apart, where feasible, to identify unknown cultural resources within the APE. For the 770 acres surveyed, 15 to 20 meter transect intervals were used in areas with ground visibility and less than 20% slopes (139 acres); and 30 to 40 meter transect intervals were used in areas with some ground visibility and between 20 and 30% slopes (631 acres). The APE is defined by the lead federal agency, generally in consultation with the SHPO, and means “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character of use of historic properties, if any such properties exist” (36 CFR 800.16).

Cultural Resource Documentation

ERO documents cultural resources according to a standardized approach to ensure consistency and accuracy. Sites are digitally documented from multiple perspectives, and all significant tools, diagnostic artifacts, and features are photographed to scale. The site datum is also photographed if physically established and directed by the land managing agency. Individual site maps are produced using a mapping grade (submeter and subcentimeter capable) Trimble GeoXH Explorer global positioning system (GPS) unit. Elements of the site map include all cultural features, diagnostic and point provenience artifacts (designated as field specimens (FS)), artifact concentrations, major vegetation breaks and contour topography, modern features and disturbances, and the site datum (whether physically established or for location purposes).

All required forms are completed digitally in the field using a tablet. Archaeological resources and newly defined segments of linear resources such as ditches and railroads were documented using a Management Data Form (OAHP1400) and appropriate component form (prehistoric archaeology, historical archaeology, or linear); the boundaries of newly defined linear resource segments are limited to the extent of the resource within the APE. Newly identified historical buildings and structures were documented on an Architectural Inventory Form (OAHP1403). Previously recorded cultural resources identified during the OAHP file search were revisited and reevaluated on OAHP form 1405; if the resource has not been reevaluated within the last 10 years and/or substantial changes have occurred to the property since the previous evaluation, ERO rerecorded and reevaluated the resource by completing new state documentation forms. Location maps (Appendix A) and OAHP resource documentation forms (Appendix B) are included only for agency consultation and reside permanently with the OAHP.

Archaeological Sites

The NRHP defines an archaeological site as “the place or places where the remnants of a past culture survive in a physical context that allows for the interpretation of these remains” (Little et al. 2000). Archaeological sites must retain sufficient context to convey purposeful and patterned human activity. Isolated finds (IF) represent evidence of past human activity that is either not patterned (as in the inadvertent loss or discard of one or more artifacts), too limited to qualify as a site, or indicative of conscious discard of material culture manufactured and/or used for its primary purpose elsewhere. Professional judgment is generally used to distinguish between purposeful activity and isolated occurrences of artifacts often attributable to “background noise”; however, in those instances where a land management agency has defined the difference between a site and an IF, ERO follows the agency’s definition.

For purposes of this project, an archaeological site is defined as an artifact scatter of more than 10 artifacts in a 10-meter-diameter area or less than 10 artifacts with one or more site features. Isolated thermal features, rock art panels, and human burials are considered archaeological sites. Surface lithic scatters that occur in a very confined area and consist of a single raw material may be attributable to a single event, single reduction episode, or exhibits limited information potential. Project APEs that contain suitable lithic raw material or are in proximity to a primary source may produce an abundance of lithic scatters. An evaluation of raw material, flake density, spatial distribution, and overall cultural context is required to make an informed decision of isolated reduction episodes. The production of a complete biface can produce dozens of thinning flakes, for example, but such flakes typically provide limited information regarding human behavior. Lithic scatters with multiple raw material types and artifact classes are considered archaeological sites. A ceramic scatter may contain dozens of individual sherds, but if the sherds represent a single vessel, the scatter is considered an IF.

Prehistoric site types are defined by the classes of artifacts found. Lithic scatters are defined by the presence of flaked lithic tools and debitage and are generally interpreted as representing short-term occupation and limited activities related to the production or rejuvenation of stone tools; open camps are defined by the presence of diverse artifact classes, including ground stone and often thermal

features, which indicate longer occupations, possibly by a greater number of people. Open and sheltered architectural sites are defined by the presence of the remains of habitation structures (such as stacked masonry walls) or by rubble mounds and pit structure depressions representing the presence of larger or more elaborate architecture. Sheltered camps, in contrast, are found under natural rock overhangs or in other protected places but without associated architecture. Finally, lithic procurement areas must exhibit primary or secondary lithic raw material available on-site, such as nodules eroding from bedrock, lamellar bedrock, or as clasts found in a secondary context (such as alluvial cobbles) at a distance from the primary source. A quarry must exhibit evidence for prehistoric excavation, evidenced by holes dug to access geologic outcrops or gravel sources.

Prehistoric artifact terminology follows Adams (2002) for ground stone, Callahan (1979) for biface stage, which is determined by establishing a width-to-thickness ratio, and Andrefsky (1998) for general approaches flake analysis.

Historic Period Sites

Historic period sites include such purposeful activities as homestead, ranching or agricultural complexes; mining complexes; federal work programs; timber harvesting; and industry, among other site types. Age criteria is established for potential historic sites by referencing general land office (GLO) patents, county assessor records, state water division records, historical maps, and 15' United States Geological Survey (USGS) maps. Historical dumps and artifact scatters without features are evaluated on a case-by-case basis. A single artifact class within a dump, such as sanitary cans, is recorded as an isolated occurrence; conversely, dumps that exhibit diverse artifact classes and date prior to the early part of the twentieth century may be documented as archaeological sites, given their information potential.

Linear structures such as water conveyance systems, transmission lines, trails, and roads are documented as sites. An isolated fence line is generally not recorded as a resource unless it demarcates a boundary significant to the history of the area and can be physically linked with a purposeful activity; an isolated fence line may also be documented as a feature of a larger resource. Depending on their cultural context, single or small clusters of mining prospect pits with no associated artifacts are documented as isolated finds due to general ubiquity and limited information potential.

Criteria for Evaluation

Documented cultural resources are evaluated for their eligibility to be listed in the National Register of Historic Places. Significance criteria are codified under 36 CFR 60.4, summarized below:

The quality of significance in American history, architecture, archaeology, 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 to the broad patterns of our history [Criterion A]; or
- b) that are associated with the lives of persons significant in the past [Criterion B]; or

- c) that embody the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possess high artistic value, or that represent a significant or distinguishable entity whose components may lack individual distinction [Criterion C]; or
- d) that have yielded, or are likely to yield, information important in prehistory or history [Criterion D].

Cultural resources that do not meet the 50-year age criterion but that are integral parts of a historic district or carry exceptional importance to the history of the region are considered for eligibility under criteria consideration (g).

Certain kinds of properties are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past fifty years" (U.S. Department of the Interior, National Park Service 1997). In order for a property to be eligible under a criteria consideration, the property must qualify for one of the four criteria and must possess integrity. Regional contexts and multi-property nominations are used to evaluate significance under Criteria A, B, and C by defining a period of significance in which the cultural resource achieved significance given events important to the interpretation of history.

Regional contexts (e.g., Church et al. 2007, Reed and Metcalf 1999) are used to evaluate significance under Criterion D by determining whether a potential property has the potential to answer defined research questions and/or date to a defined period of significance. Historical sites representative of the built environment (i.e., buildings, structures, and engineered features) typically qualify for listing in the NRHP under at least one of the first three criteria (A–C). Archaeological sites typically qualify exclusively under Criterion D, with notable exceptions. An otherwise heavily disturbed site may still retain information potential from intact features (potential chronometric or subsistence data) or discrete areas of the site that retain physical integrity. Archaeological sites with significant sediment deposition remain potentially eligible for listing in the NRHP even without evaluative testing.

Sites evaluated as "needs data" may be eligible under one or more criteria but require further work to determine NRHP eligibility. Cultural resources recommended "needs data" are predominantly archaeological sites (either prehistoric or historical) suspected of containing buried cultural deposits or historical sites where additional research is necessary to ascertain significance. Sites that are evaluated as not eligible for listing in the NRHP do not meet any of the eligibility criteria and/or have lost physical integrity. Cultural resources are assessed for integrity only if the site meets one or more eligibility criteria. Eroded or otherwise heavily disturbed archaeological sites are typically not considered eligible since the ability to convey significance in the form of intact cultural deposits (i.e., information potential) has been lost through natural or modern disturbance.

For a property to be eligible under one or more criteria, the property must possess physical integrity and retain most if not all aspects of integrity: *location, design, setting, materials, workmanship, feeling, and association*. Most important of these for any building or structure are the aspects of location, design,

and setting. Any property or linear resource that has been relocated/realigned no longer retains integrity of location, perhaps the most important aspect of integrity. The aspect of design is important for demonstrating a building or structure's association with significant historical trends, and is required for a property to qualify under criteria A or C. Considering most historical properties are still in use, a resource can maintain integrity of design if materials have been maintained in-kind to the design of the original structure or building; for example, in-kind replacement of materials such as wood siding or railroad hardware with modern materials does not diminish integrity of design. However, modern maintenance and upgrades to earthen ditches such as the placement of modern diversion structures and concrete lining does diminish the ditch segment's ability to support eligibility under criteria A or C. The aspects of feeling and association are intrinsically linked to the aspect of setting; suburban development and modern intrusions on the setting of a potential historic property diminish its ability to convey significance.

ERO uses the following generalized approach to assess integrity under Criterion D. Most archaeological sites are considered to be in their original *location* unless post-depositional processes, such as erosion, have transported artifacts away from their original context. Artifacts can move both vertically and horizontally in subsurface contexts. The site retains *location* if no significant post-depositional processes have altered the primary context of the artifacts. The aspect of *design* is present if the relationship between features or activity loci is apparent and the spatial organization of the site is discernible; *design* may also be present in highly formalized tools such as projectile points, ceramic vessels, architectural elements, or individual features. *Setting* refers to the surrounding physical environment of a site, which may be affected by modern development or changes to the natural environment (such as important biotic species) through climate change or modern development. *Setting* is considered intact if the surrounding environment is similar to the environment during the time of occupation. The aspect of *materials* is almost always retained due to the nature of the archaeological record and the material culture inherent to archaeological sites: If there were no physical artifacts or features (i.e., *materials*) present, there would not be a site. *Workmanship* is retained by the presence of artifacts, architecture, or features emblematic of a particular culture or people, such as a Puebloan kiva or a Clovis projectile point. The aspect of *feeling* is difficult to ascertain for archaeological sites and is often dependent on Native American perspective. Very few of the physical features present during occupation of a prehistoric site still exist in the present to convey a property's character. A site that retains *association* can be linked to a particular cultural-historical period through the presence of diagnostic artifacts or architectural elements or by chronometric means.

Each documented cultural resource described in the Survey Results section, below, is provided a recommendation of National Register of Historic Places eligibility and evaluated for project effects. Based on this documentation, the lead agency will provide a determination of eligibility for each documented cultural resource based on ERO's recommendation and will provide a determination of project effect on historic properties. The lead agency will then provide SHPO an opportunity to review and provide comment regarding NRHP eligibility and project effects per 36 CFR 800.4 through 800.5. If,

during consultation between the lead agency and SHPO, a determination of “adverse effects to historic properties” occurs, further consultation is required to resolve adverse effects.

File and Literature Review

ERO conducted a file and literature review for the project using information from OAHP (File Search No. 21907) and from GMUG on June 5, 2019. A total of 39 previous inventories and 8 previously recorded cultural resources are within 1 mile of the survey area. Previous surveys are primarily for coal development and infrastructure projects in the area. Fifteen of these surveys overlap the current APE (Table 2) and most were conducted in the late 1970s and early 1980s and would not meet modern standards.

Table 2. Previous cultural inventories within the APE.

State Project No.	Report Title (Date)	Institution
GN.FS.NR151	Mountain Coal Company's West Elk Mine 1996 Exploration Program, Five Exploratory Drill Holes and Alternate And 4.5 Miles Of Proposed Temporary Access Corridors, Gunnison National Forest, Gunnison County, Colorado (1995)	Metcalfe Archaeological Consultants
GN.FS.NR162	Arch Coal Company's West Elk Mine Proposed 99-K Seismic Line Along Deep Creek Class III Cultural Resource Inventory Gunnison County, Colorado (1999)	Greystone Environmental Services, Inc.
GN.FS.NR173	Mountain Coal Company's West Elk Mine Gob Vent/De-Gas Boreholes Class III Cultural Resource Inventory T13s, R30w, Sections 23, 26, 27, 34, And 35 Gunnison County, Colorado (2001)	Greystone Environmental Services, Inc.
GN.FS.NR177	Mountain Coal Company West Elk Mine Drill Pads for Panels 16, 17 And 17s Class III Cultural Resource Inventory Gunnison County, Colorado (2001)	Greystone Environmental Services, Inc.
GN.FS.NR20	Minnesota Creek and Dry Fork Minnesota Gaging Stations (1981)	GMUG
GN.FS.NR235	A Cultural Resources Inventory of Mountain Coal Company L.L.C.'S E Seam Mdw Drilling For Panels 10, 11, 12, E1, E2, And E3, Gunnison County, Colorado (#R2007020408072) (2007)	Alpine Archaeological Consultants
GN.FS.NR246	A Cultural Resources Inventory of Mountain Coal Company L.L.C.'S E Seam Mdw Drilling For Panels E4-E9, Gunnison County, Colorado (Wemc-G-Weijoa) (2008)	Alpine Archaeological Consultants
GN.FS.NR264	Revisions To E-Seam Mdw Panel 3 (R2010020408072a) (Addendum To GN.FS.NR235) (2011)	GMUG
GN.FS.NR265	Archaeological Clearance for Revised E3-29 Well Location And Access Route (Technical Revision 126), July 2011 Addendum, Gunnison County, Colorado (2011)	GMUG
GN.FS.NR268	Archaeological Clearance for Methane Drainage Well E3-65 And Access Route October 2011 -- Addendum, Gunnison County, Colorado (R2011020408072c) (2011)	GMUG
GN.FS.NR65	Lick Creek-Ditch Pasture Fence (1979)	GMUG
GN.FS.NR82	Dry Fork Allotment 1984 Range Improvement Projects (1984)	GMUG
GN.FS.NR97	Dry Fork Ponds And Trails (1983)	GMUG

State Project No.	Report Title (Date)	Institution
GN.FS.R74	Dry Fork Oakbrush Burn Gunnison National Forest Final Report (1979)	Cultural Resource Consultants
GN.FS.R96	Cultural Resources Inventory Report Three Proposed Wells In The Minnesota Creek Drainage, Gunnison National Forest, Gunnison National Forest (1984)	Grand River Institute

Of the eight previously recorded sites within one mile of the APE, two are segments of previously documented ditches, two are historical habitations, and four are prehistoric isolated finds. Only two of the prehistoric isolated finds, 5GN1102 and 5GN1734, are located within the current survey area. These isolates were not relocated during the 2019 survey.

Additionally, ERO reviewed historical maps and found four previously undocumented resources: two historical roads, one historical cow camp, and one historical cabin. These sites were documented during the 2019 survey and are described below.

Survey Results

ERO documented two new historical cultural resources and two new segments of new linear resources within the 770 acres of the APE that were surveyed (Table 3). Several small two-track roads and pack trails cross the APE but were not documented as per the Colorado Cultural Resource Survey Manual (OAHF 2007). These roads lack historical significance or names and did not serve as important transportation corridors, nor are they associated with larger sites. In addition, a total of four isolated finds were documented (Table 4).

Table 3. Newly documented sites.

Smithsonian Site No.	Resource Type/Name	NRHP Eligibility Recommendation
5GN6494.1	Hammond Trail (Minnesota Creek Road/County Road 50) segment	Eligible, non-supporting
5GN6495.1	Deer Creek Road segment	Not eligible (entire resource; no segment evaluation)
5GN6496	Hammond Cow Camp / Dry Fork Cow Camp	Eligible
5GN6497	Historical cabin	Not eligible

Resource Descriptions

5GN6494.1: Historical Trail Segment: Hammond Trail (Minnesota Creek Road/County Road 50)

Description: 5GN6494.1 is a segment of the Hammond Trail (now known as Minnesota Creek Road / County Road 50) located east of the town of Paonia. The vegetation along the road includes dense stands of scrub oak and chokecherry, and riparian areas along the Dry Fork of Minnesota Creek comprise

dense stands of willow. Ground visibility is 60 to 90 percent. The elevation is 2,377 meters (7,800 feet) asl.

The road is now crown and ditch with a narrow shoulder (less than 12 inches); the surface is alternately graveled and dirt. Segment 1 is approximately 2.3 miles long and 16 feet wide (shoulder to shoulder). Minnesota Creek Road begins southwest of the town of Paonia in Delta County and extends approximately 5 miles east, where the road becomes Forest Service Road 711. The road travels northeast for 2.6 miles past Minnesota Reservoir, where it becomes Colorado Road 50. Segment 1 begins 0.1 miles east of the intersection of Forest Service Road 711 and Colorado Road 50 and travels approximately 2.3 miles along the course of the Dry Fork of Minnesota Creek. Colorado Road 50 continues another 1.3 miles to the southeast, where it terminates near the northern toe slopes of Mt. Gunnison.

A trail that generally follows the same alignment as 5GN6494.1 along Minnesota Creek is visible on an 1885 GLO map for Township 13 South, Range 90 West (GLO 1885). Some portions of the 1885 trail are on the opposite side of the creek from the current alignment. 5GN6494.1 also appears as the Hammond Trail on a 1938 Mount Gunnison 1:62,500 topographic map (USGS 1938). The 1938 map suggests that the route originally connected the town of Paonia to Hammond Cow Camp (5GN6496) and then continued east/southeast until it intersected a trail in Coal Creek. The road appears to have been updated to a jeep trail by 1963, based on a historical aerial image (USGS 1963). It is labelled as a jeep trail on the 1979 Somerset and Minnesota Pass, CO 7.5' USGS Quadrangles (USGS 1979a, 1979b).

NRHP Eligibility: Although ERO did not survey the entire road corridor, aerial overviews and archival sources were used to evaluate eligibility for its entire length. ERO recommends the entire Minnesota Creek Road alignment as eligible for listing in the NRHP under Criterion A. The road appears to have been built over a trail along the Dry Fork of Minnesota Creek, which served as an early transportation corridor from Paonia to Coal Creek. It most likely served as the main access from the town of Paonia to the Gunnison National Forest, which was established in 1905. The road may be noteworthy for a potential association with coal mining development in Gunnison County (Criterion A) and/or an association with early ranching activity because it served as a transportation corridor among farms in the North Fork Valley and higher elevation grazing areas. The road is not known to be associated with any historically significant individuals (Criterion B). The road does not have engineering significance (design, materials, and workmanship; Criterion C). No significant information potential remains (Criterion D).

Segment 1 is recommended as non-supporting of the overall eligibility of the entire resource. The road has been converted to crown and ditch and is now graveled for portions of the road. Therefore, maintenance and road improvements have affected the integrity of materials, workmanship, and design. The aspect of location is mostly intact; however, small portions of the original trail alignment have been modified based on the 1885 GLO map. The historical setting, feeling, and association have been compromised by industrial development associated with coal mining.

Management and Project Effect Recommendations: No further work upon concurrence with the non-supporting recommendation. Additionally, based on current design for the placement of MVB pads and road, this resource would not be affected by any of the proposed construction. It will be used for access but no upgrades are proposed.

5GN6495.1: Historical Road Segment (Deer Creek Road)

Description: 5GN6495.1 is a segment of Deer Creek road located west of the town of Paonia. Surrounding vegetation consists of dense stands of scrub oak and chokecherry, with dense stands of willow found along the riparian areas. Ground visibility is 30 to 60 percent. Elevation is 2,328 meters (7,640 feet) asl.

Deer Creek Road begins at the T intersection with Forest Service Road 711, approximately 0.5 miles east of the Minnesota Reservoir Dam. Segment 1 is approximately 0.1 miles long and 16 feet wide. The road is a dirt road with narrow shoulders (less than 12 inches).

The earliest evidence of a trail along Deer Creek occurs on a 1963 historical aerial map (USGS 1963). The alignment is not well defined on this aerial map. The first formal reference to a trail appears on the 1964 Somerset and Minnesota Pass, Colorado, USGS topographic maps (USGS 1964a, 1964b). It is likely that the road was created with the expansion and development of nearby coal mining and grazing activities on the GMUG.

NRHP Eligibility: Although ERO did not survey the entire road, aerial overviews and archival sources were used to evaluate eligibility. ERO recommends the entire Deer Creek Road alignment as not eligible for listing in the NRHP. The road first appears on two USGS topographic maps in 1964 (USGS 1964), and the road does not appear to have played an important role in the development of the area. The trail was not historically an important transportation corridor. Segment 5GN6495.1 is not known to be associated with important historical events or persons (Criteria A and B). The road does not have engineering significance (design, materials, and workmanship; Criterion C). No significant information potential remains (Criterion D). Because the entire resource is recommended not eligible, segment evaluation is unnecessary.

Management and Project Effect Recommendations: No further work upon concurrence with the not eligible recommendation. Additionally, based on current design for the placement of MVB pads and roads, this resource would not be affected by any of the proposed construction.

5GN6496: Hammond Cow Camp/Dry Fork Cow Camp

Description: 5GN6496 is a historical grazing camp located at the base of a steep south-facing slope on the northern terrace of the Dry Fork of Minnesota Creek, east of the town of Paonia. On-site vegetation consists of dense stands of scrub oak and chokecherry on the upland portions of the site and dense

stands of willow in the riparian areas adjacent to the Dry Fork of Minnesota Creek. The ground visibility is 30 to 60 percent. Elevation is 2,339 meters (7,675 feet) asl.

The camp is located along County Road 50 (5GN6494.1) and consists of eight features. Feature 1 (F1) is a one-story wood-frame cabin (Figure 3). The rectangular foundation is constructed of concrete and native stone and measures 34.75 by 15.75 feet. Exterior walls are clad with vertical lumber board siding (batten board). The entrance is off center on the south elevation and covered with a paneled metal door with multiple lights in the top half. The door is elevated slightly over a small concrete pad porch that is flush to the ground. The front-gabled roof extends almost 4 feet over the porch, and the roof extension features decorative saw tooth-shaped trim. On the east side of the porch a concrete block chimney is exposed along the exterior of the south elevation and through the slope of the roof extension. The roof is covered with lapped seam steel sheets and features exposed rafter tails. On the rear (north) elevation of the building is a shed addition measuring 8 feet by 16 feet wide; it has a separate entrance covered with a vertical board door on its west side. Window fenestrations include a wood-framed sliding window centered on the south elevation, two aluminum-framed sliding windows on the east elevation, and one aluminum-framed sliding window on the west elevation. The cabin has been continually maintained and is currently in use, and it is, therefore, in good condition. Visible exterior alterations include recent replacement of the front door, most windows, and the roof with modern metal materials.



Figure 3. Overview of F1.

F2 is a water catchment feature to the east of the main cabin on a small drainage that includes an outlet of PVC pipe into two troughs; active and/or abandoned components of the features appear to be made from salvaged and modified materials, including a water softener. F3 is a fire ring made of local stone. The fire ring contains modern trash.

F4 is a wood-framed outhouse measuring 5 feet by 3 feet. The walls are constructed of vertical lumber boards, and the shed roof is covered with asphalt roll. Recent repairs include use of corrugated steel sheets to patch exterior damages.

F5 is a loafing shed with an enclosed storage area and a small corral located at the center of the site. Exterior walls are clad with vertical lumber boards (batten board), and plywood is visible in the interior of the open livery. The south wall of the livery portion of the shed is uncovered (about 12 feet by 15 feet), and the east third of the shed is fully enclosed (8 feet by 15 feet). The building has a concrete-footing foundation in a rectangular plan that measures 20 feet by 15 feet. The attached corral is constructed of a variety of materials, including steel tube gates, chain link fence, timbers and unhewn logs, and bailing wire.

F6 is a fence line oriented east-to-west north of the features and includes a gate. It is constructed of rebar, barbed wire, and timbers. F7 is a circular depression measuring approximately 3 feet in diameter and 3 to 6 inches deep; it is a possible privy location.

F8 is a corral complex that measure 75 feet by 45 feet and includes an inner division in the southwest corner; the complex is constructed primarily of unhewn logs and bailing wire; gates are constructed from milled lumber and steel tubes. A large rectangular fiberglass water trough that is fed by a PVC pipe is located in the northeast portion of the corral.

5GN6496 appears on a 1938 Mount Gunnison 1:62,500 topographic map as the Hammond Cow Camp (USGS 1938). Forest Service records indicate the spring (F2) was constructed in 1935 and the cabin (F1) was constructed in 1940 (USDA Forest Service 2007). The structure has remained in the same location, according to historical aerials, and still serves as a water source for cattle that graze on Forest Service land. The new door and windows on the cabin and modern gates F5 and F8 show that the site has been maintained, but the overall design and materials of the site have not been significantly modified. The camp is still used for the same purpose as when originally built. Building materials and weathering indicate that the cabin and associated features F4 (potentially) and F5 were constructed during the same period; therefore, features F1, F4, and F5 contribute to the eligibility of the resource.

NRHP Eligibility: ERO recommends 5GN6496 as eligible for listing in the NRHP under Criteria A and D. The site is associated with development of grazing programs on the GMUG. Archival research did not indicate the grazing camp is known to be associated with any historically significant individuals (Criterion B), nor do any constructed features embody a distinctive architectural design or any unique aspects of craftsmanship or engineering (Criterion C). Cultural materials dumped into the privy (F7) have potential to yield information important to interpreting the history of the camp (Criterion D).

Integrity of location, setting, feeling, design, and association have largely remained intact, due to the continued use of the camp for its original purpose as a camp for grazing allottees on the GMUG. The aspects of workmanship and materials have been minimally impacted by the small upgrades to the cabin, but these aspects remain largely intact.

Management Recommendations: Avoid and protect. The current design for the placement of MVB pads and roads will not impact this resource.

5GN6497: Historical Cabin

Description: 5GN6497 consists of a sparse scatter of possible structural debris located on a terrace at the confluence of the Dry Fork of Minnesota Creek and an unnamed drainage. . Surrounding vegetation includes low-lying forbes and grasses, with willow located adjacent to the drainage. Ground visibility is 70 to 90 percent. Elevation is 2,341 meters (7,680 feet) asl.

A sparse scatter of structural debris (F1) includes 11 sandstone cobbles and 6 cut log remnants with evidence of burning. A square sheet of galvanized tin with a circular stove pipe hole in the center was located approximately 51 ft northwest of F1. At the time the site was recorded, the area was saturated from flowing water during spring runoff. Additional cultural material may be present but could not be assessed due to saturated ground; however, any cultural material would now be compromised from periodic saturation.

The only evidence that the site represents a cabin appears on a GLO plat from 1885. A square labelled **Cabin** is located on the map in the approximate location as 5GN6497. Archival research indicates that the cabin was not present for long. The 1938 Mt. Gunnison topographic map notes the location of the Hammond Cow Camp/Dry Fork Cow Camp (5GN6496) northwest of 5GN6497 but does not indicate the presence of a cabin in the current location of the site (USGS 1938). Additionally, aerial photographs from 1963 show no standing structures in the location of 5GN6497 (USGS 1963).

NRHP Eligibility: ERO recommends site 5GN6497 not eligible for listing in the NRHP due to loss of integrity. The site is potentially eligible under Criterion A due to its association with early settlement in the North Fork valley. The cabin is not known to be associated with any historically significant individuals and is not eligible for listing in the NRHP under Criterion B. There are no remaining structures on the site, and the sparse scatter of structural debris does not embody any unique aspects of design or craftsmanship (Criterion C). The fluctuation of the water table and the presence of wetland within the site has heavily impacted the likelihood for intact archaeological deposits to be present (Criterion D).

The only intact aspect of integrity is location. Burning and removal of the cabin structure have affected the integrity aspects of materials, workmanship, design, feeling, and association. The historical setting has been compromised by development associated with coal mining as well as alteration of the original trail that led to the cabin (the trail is now a heavily travelled road).

Management Recommendations: No further work upon concurrence with the not-eligible recommendation. Regardless, based on current design for the placement of MVB pads and roads, this resource would not be affected by proposed project activities.

Isolated Finds

Four IFs were documented within the APE, including one prehistoric and three historical (Table 4). The historical isolates include two Parshall Flumes and one riveted boiler or stove. The prehistoric isolate consists of a single orthoquartzite flake.

Table 4. Isolated finds.

Smithsonian Number	Temporal Period/Affiliation	Description
5GN6498	Historic	Riveted boiler/stove
5GN6499	Prehistoric	One light gray orthoquartzite secondary flake
5GN6500	Historic	Parshall Flume on Minnesota Creek
5GN6501	Historic	Parshall Flume on Minnesota Creek

Summary and Management Recommendations

Within or overlapping the APE are two segments of newly recorded linear resources and two newly recorded historical resources (Table 5). The Dry Fork Cow Camp (5GN6496) is recommended eligible for listing in the National Register of Historic Places (NRHP). One linear resource (5GN6494.1) is recommended non-supporting of the eligibility of the entire resource. The remaining two sites (5GN6495.1 and 5GN6497) are recommended not eligible for listing in the NRHP. Additionally, ERO documented four isolated finds; none of these isolated finds are eligible for inclusion in the NRHP. No further work is necessary for all resources recommended not eligible. Proposed project activities will not affect any of the documented resources such that all resources would be avoided. ERO recommends a determination of “no adverse effect to historic properties” pursuant to 36 CFR 800.5 of the National Historic Preservation Act.

Table 5. Management recommendations.

Smithsonian Number	Resource Type/Name	NRHP Eligibility Recommendation	Management Recommendation
5GN6494.1	Hammond Trail (Minnesota Creek Road/County Road 50) segment	Eligible, non-supporting	No further work
5GN6495.1	Deer Creek Road segment	Not eligible (entire resource; no segment evaluation)	No further work
5GN6496	Hammond Cow Camp/Dry Fork Cow Camp	Eligible	Avoid and protect
5GN6497	Historical Cabin	Not eligible	No further work

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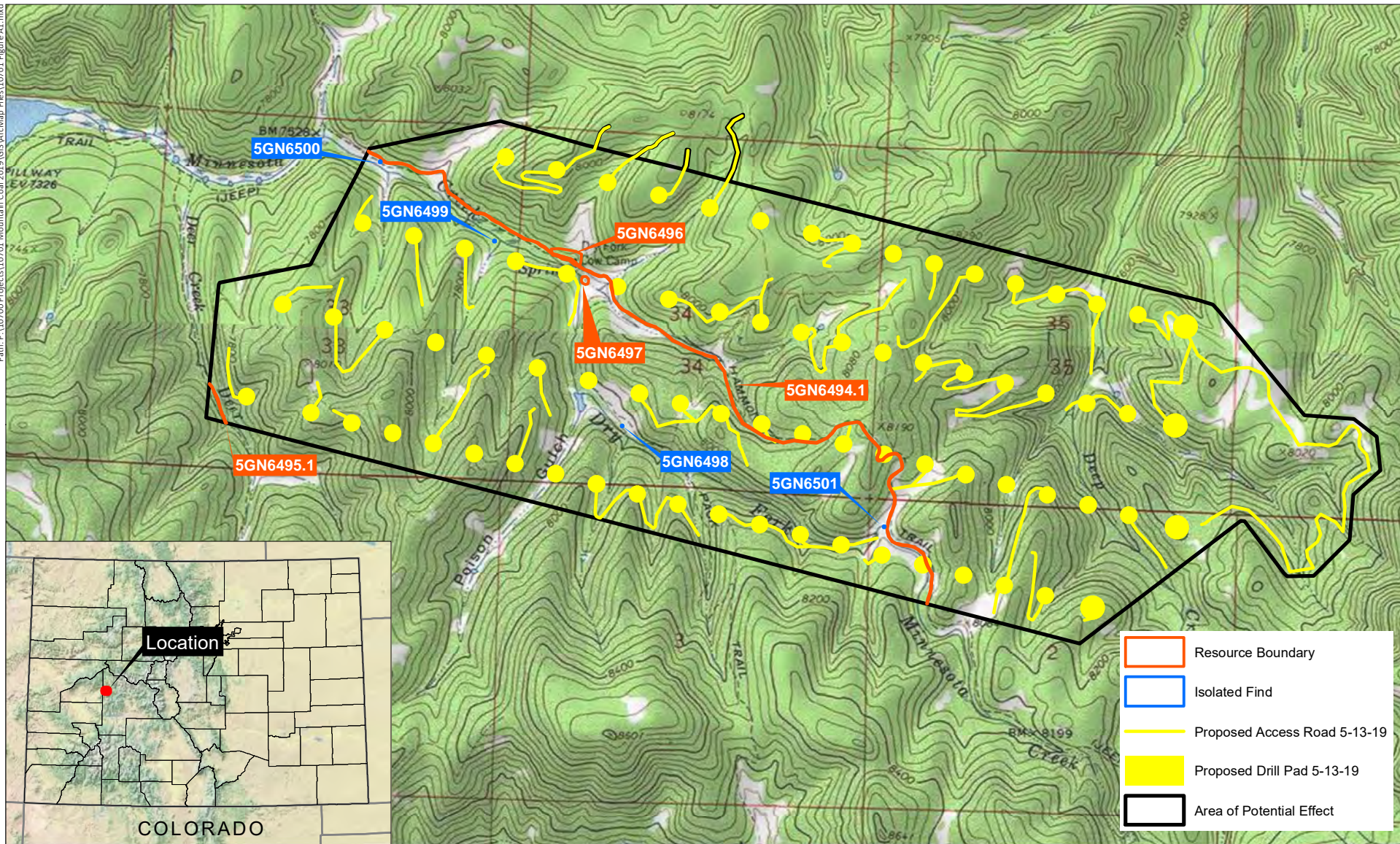
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Appendix A Cultural Resource Location Map
For Official Use Only: Disclosure of Site Locations Prohibited (43 CFR 7.18)



Class II Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM
 Sections 1-4, T14S, R90W; 6th PM
 USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
 Gunnison County, Colorado

0 1,000 2,000
 Feet
 1:24,000

Figure A1
Resource Locations

Prepared for: Mountain Coal Company, LLC
 File: 10701 Figure A1.mxd (MH)
 July 3, 2019

ERO
 ERO Resources Corp.

Appendix B OAHP Cultural Resource Documentation Forms
For Official Use Only: Disclosure of Site Locations Prohibited (43 CFR 7.18)

Management Data Form

A Management Data Form should be completed for each cultural resource recorded during an archaeological survey. Isolated finds and revisits are the exception and they do not require a Management Data Form. Please attach the appropriate component forms and use continuation pages if necessary. Fields can be expanded or compressed as necessary.

1. Resource Number: 5GN6494.1**2. Temporary Resource Number:** 10701-KC02.1**3. Attachments (check as many as apply)**

- ☐ Prehistoric Archaeological Component
☐ Historic Archaeological Component
☒ Linear Component
☒ Sketch/Instrument Map (required)
☒ U.S.G.S. Map Photocopy (required)
☒ Photograph(s) (required)
☐ Other, Specify:

4. Official Determination (OAHP use only)

- ☐ Determined Eligible NR/SR _____
☐ Determined Not Eligible NR/SR _____
☐ Nominated _____
☐ Need Data NR/SR _____
☐ Contributing to NR Dist./SR Dist _____
☐ Not Contributing to NR Dist./SR Dist _____
☐ Supports overall linear eligibility NR/SR _____
☐ Does not supports overall linear eligibility NR/SR _____

I. IDENTIFICATION**5. Resource Name:** Hammond Trail (Minnesota Creek Road/County Road 50) segment**6. Project Name/Number:** Mountain Coal Future B Seam (Project 10701)**7. Government Involvement:** ☐ Local ☐ State ☒ Federal

Agency: Grand Mesa, Uncompahgre, and Gunnison National Forests

8. Site Categories (check as many as apply):

Prehistoric: ☐ archaeological site ☐ paleontological site ☐ In existing National Register district
 National Register district name:

Historic: ☐ archaeology site ☐ building(s) ☒ structure(s) ☐ object(s) ☐ In existing National Register district
 National Register District name

9. Owner(s) Name and Address Grand Mesa, Uncompahgre, and Gunnison National Forests
 2777 Crossroads Boulevard, Unit 1
 Grand Junction, Colorado 81506

10. Boundary Description and Justification: Extent of the road within the APE

11. Site/Property Dimensions: Length: 3840m Width: 3.75m Area: 14004m² Ac: 3.46
 Area was calculated as: ☐ Length x Width (rectangle/square) ☐ Length x Width x 0.785 (ellipse) ☒ GIS

II. LOCATION**12. Legal Location**

PM: 6th	Township: 13S	Range: 90W	Section: 33	NW	1/4 of	NE	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 33	NE	1/4 of	NE	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 33	SE	1/4 of	NE	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 34	SW	1/4 of	NW	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 34	SE	1/4 of	NW	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 34	NE	1/4 of	SW	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 34	NW	1/4 of	SE	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 34	SW	1/4 of	SE	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 34	SE	1/4 of	SE	1/4
PM: 6th	Township: 13S	Range: 90W	Section: 35	SW	1/4 of	SW	1/4
PM: 6th	Township: 14S	Range: 90W	Section: 2	NW	1/4 of	NW	1/4

Management Data Form

Resource Number: 5GN6494.1

Temporary Resource Number: 10701-KC02.1

If section is irregular, explain alignment method:

13. USGS Quad(s) Somerset, CO, Minnesota Pass,
CO

14. County(ies): Gunnison

15. UTM Coordinates: Datum used ☐ NAD 27 ☒ NAD 83 ☐ WGS 84 ☐ Other:

A. Zone 13 287,351 mE 4,306,527 mN

B. Zone 13 287,353 mE 4,306,530 mN

C. Zone 13 289,786 mE 4,304,558 mN

D. Zone 13 289,783 mE 4,304,559 mN

16. UTM Source: ☒ Corrected GPS/rectified survey (<5m error) ☐ Uncorrected GPS ☐ Map template
Other (explain):

17. Site elevation (feet): 7,800

18. Address

Lot:

Block:

Addition:

19. Location/Access From Paonia CO, drive east along Minnesota Creek Road until the intersection of Forest Service Roads 710A and 711. Take a left to FSR 711 and continue for approximately 2.6 miles, passing the Minnesota Reservoir to your north until the road intersects with CR 50. Take CR 50 and drive southeast for 0.15-mile to the beginning of the segment.

III. NATURAL ENVIRONMENT/SITE CONDITION

20. General Description should include both on-site as well as geographical setting with aspect, landforms, vegetation, soils, depositional environment, water, ground visibility):

5GN6494.1 is a segment of the Hammond Trail (now known as Minnesota Creek Road / County Road 50) located east of the town of Paonia. The vegetation along the road includes dense stands of scrub oak and chokecherry, and riparian areas along the Dry Fork of Minnesota Creek comprise dense stands of willow. Ground visibility is 60 to 90 percent.

21. Soil depth (cm) and description:

Soils and depths vary, with most consisting of a very deep and well drained clay loam formed in slope alluvium (NRCS 2019).

22. Condition

a. Architectural/Structural

☐ Excellent

☒ Good

☐ Fair

☐ Deteriorated

☐ Ruin

b. Archaeological/Paleontological

☐ Undisturbed

☐ Light disturbance

☐ Moderate disturbance

☐ Heavy disturbance

☐ Total disturbance

23. Describe condition:

The road is in use and in good condition.

24. Vandalism: ☐ Yes ☒ No

Describe:

IV. NATIONAL/STATE REGISTER ELIGIBILITY ASSESSMENT

25. Context or Theme(s): Linear Resources (Späth 2007)
Mining and Mineral Processing (Horn et al. 2007)

26. Applicable National Register Criteria:

Management Data Form

Resource Number: 5GN6494.1

Temporary Resource Number: 10701-KC02.1

- ☒ A. Associated with events that have made a significant contribution to the broad pattern of our history
- ☐ B. Associated with the lives of persons significant in our past
- ☐ C. Embodies 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
- ☐ D. Has yielded, or may be likely to yield, information important in history or prehistory
- ☐ Does not meet any of the National Register criteria
- ☐ Qualifies under exceptions A through G. List exception(s):

27. Applicable State Register Criteria:

- ☒ A. Property is associated with events that have made a significant contribution to history
- ☐ B. Property is connected with persons significant in history
- ☐ C. Property has distinctive characteristics of a type, period, method of construction or artisan
- ☐ D. Property is of geographic importance
- ☐ E. Property contains the possibility of important discoveries related to prehistory or history
- ☐ Does not meet any of the State Register criteria

28. Areas of significance:

Transportation

29. Periods of significance:

1900s-1960s

30. Level of significance: ☐ National ☐ State ☒ Local

31. Statement of significance:

Although ERO did not survey the entire road corridor, aerial overviews and archival sources were used to evaluate eligibility for its entire length. ERO recommends the entire Minnesota Creek Road alignment as eligible for listing in the NRHP under Criterion A. The road appears to have been built over a trail along the Dry Fork of Minnesota Creek, which served as an early transportation corridor from Paonia to Coal Creek. It most likely served as the main access from the town of Paonia to the Gunnison National Forest, which was established in 1905. The road may be noteworthy for a potential association with coal mining development in Gunnison County (Criterion A) and/or an association with early ranching activity because it served as a transportation corridor among farms in the North Fork Valley and higher elevation grazing areas. The road is not known to be associated with any historically significant individuals (Criterion B). The road does not have engineering significance (design, materials, and workmanship; Criterion C). No significant information potential remains (Criterion D).

32. Statement of historic integrity related to significance (reference Location, Design, Setting, Materials, Workmanship, Feeling, and Association):

The road has been converted to crown and ditch and is now graveled for portions of the road. Therefore, maintenance and road improvements have affected the integrity of materials, workmanship, and design. The aspect of location is mostly intact; however, small portions of the original trail alignment have been modified based on the 1885 GLO map. The historical setting, feeling, and association have been compromised by industrial development associated with coal mining.

33. National Register Eligibility Field Assessment:

Linear Segment Evaluation (if applicable):

- | | | |
|----------------------------------------------|----------------------------------------------------|------------------------------------|
| <input checked="" type="checkbox"/> Eligible | <input type="checkbox"/> Not eligible | <input type="checkbox"/> Need data |
| <input type="checkbox"/> Supporting | <input checked="" type="checkbox"/> Non-supporting | |
| <input type="checkbox"/> Contributing | <input type="checkbox"/> Non-contributing | |
| <input checked="" type="checkbox"/> Eligible | <input type="checkbox"/> Not eligible | <input type="checkbox"/> Need data |
| <input type="checkbox"/> Contributing | <input type="checkbox"/> Non-contributing | |

34. Status in an existing National Register District:

35. State Register Eligibility Field Assessment:

36. Status in an existing State Register District:

37. National/State Register District Potential: ☐ Yes ☒ No Describe:

Insufficient density of sites, structures, buildings, or objects exists within the area to constitute a historic district.

Management Data Form

Resource Number: 5GN6494.1

Temporary Resource Number: 10701-KC02.1

38. Cultural Landscape Potential: ☐ Yes ☒ No Describe:

No cultural landscape potential.

39. If Yes to either 37 or 38, is this site: ☐ Contributing ☐ Non-contributing Explain:

V. MANAGEMENT AND ADMINISTRATIVE DATA

40. Threats to Resource ☐ Water erosion ☐ Wind erosion ☐ Grazing ☐ Neglect ☐ Vandalism
☒ Recreation ☐ Construction ☐ Other (explain):

41. Existing protection: ☐ None ☐ Marked ☐ Fenced ☐ Patrolled ☒ Access controlled
☐ Other (specify):

Comments:

42. Local landmark designation:

43. Easement:

44. Recorder's Management Recommendations: No further work

No further work upon concurrence with the non-supporting recommendation. Additionally, based on current design for the placement of MVB pads and road, this resource would not be affected by any of the proposed construction. It will be used for access but no upgrades are proposed.

VI. DOCUMENTATION

45. Previous actions accomplished at the site: ☐ Tested ☐ Partial excavation ☐ Complete excavation

Date(s):

a. Excavations:

b. Stabilization:

c. HABS/HAER documentation [date(s) and numbers]:

d. Other:

46. Known collections/reports/interviews and other references (list):

General Land Office (GLO)

1885 Township No. 13 South Range No. 90 West of the 6th Principal Meridian, Colorado. Map. 40 chains to an inch. U.S. Surveyor General's Office, Denver.

Natural Resources Conservation Service (NRCS)

2019 Web Soil Survey. Electronic document, <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>, accessed June 28, 2019.

United States Geological Survey (USGS)

1938 Mt. Gunnison, Colorado Map. 1:62,500 (Topographic). U.S. Department of the Interior Geological Survey.

1963 Historical Aerial, Entity ID: AR1VAQR00010034. Electronic Document: <https://earthexplorer.usgs.gov/>. Last Accessed June 26, 2019.

1979a Somerset, Colorado Map. 1:24,000 (Topographic). U.S. Department of the Interior Geological Survey.

1979b Minnesota Pass, Colorado Map. 1:24,000 (Topographic). U.S. Department of the Interior Geological Survey.

1963 Historical Aerial, Entity ID: AR1VAQR00010034. Electronic Document: <https://earthexplorer.usgs.gov/>. Last Accessed June 26, 2019.

47. Primary location of additional data: ERO Resources Corporation

48. State or Federal Permit number: CAN715HR

Management Data Form

Resource Number: 5GN6494.1

Temporary Resource Number: 10701-KC02.1

49. Collection: Artifact collection authorized: ☐ Yes ☒ No Were artifacts collected? ☐ Yes ☒ No

Artifact repository:

Collection method: ☐ Diagnostics ☐ Grab ☐ Random Sample

Other (specify):

50. Photograph Numbers: K.1040001-006

Files or negatives stored at: ERO Resources Corporation

51. Report Title: Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision #TR-147, Gunnison County, Colorado

52. Recorder(s): Kathy Croll, Matthew Howryla, Justin Batista

Date: 6/10/2019

53. Recorder affiliation: ERO Resources Corporation - Denver/Durango

Phone number/Email: 303.830.1188 / 970.422.2136

Note: Please attach a site map, a photocopy of the USGS 1:24000 map indicating resource location, and photographs.

Colorado Historical Society - Office of Archaeology & Historic Preservation
1200 Broadway, Denver, CO 80203
303-866-3395

Linear Component Form

This form should be completed for each linear resource or linear segment. Use this form in conjunction with the Management Data Form. Call OAHP staff (303-866-5216) prior to assigning a resource number.

I. Resource Identification**1. Resource Number:** 5GN6494.1**2. Temporary Resource Number:** 10701-KC02.1**3. Site Name:** Hammond Trail (Minnesota Creek Road/County Road 50) segment**4. Record of:** ☐ Entire resource ☒ Segment **Segment No:** 1**II. Resource Description****5. Resource Type:** ☒ Road ☐ Railroad ☐ Trail ☐ Ditch/Canal ☐ Other (specify):**6. Component Description:**

The road is now crown and ditch with a narrow shoulder (less than 12 inches); the surface is alternately graveled and dirt. Segment 1 is approximately 2.3 miles long and 16 feet wide (shoulder to shoulder).

7. Original Use: Trail**8. Current Use:** Transportation**9. Modifications (describe and include dates):**

Unknown

10. Extent of Entire Resource:

The full extent of Minnesota Creek Road is about 11.3 miles and it begins southwest of the town of Paonia in Delta County and travels approximately 5 miles east, where the road becomes Forest Service Road 711. The road travels northeast past Minnesota Reservoir, where it becomes Colorado Road 50. Segment 1 begins 0.1 miles east of the intersection of Forest Service Road 711 and Colorado Road 50 and travels approximately 2.3 miles along the course of the Dry Fork of Minnesota Creek. Colorado Road 50 continues another 1.3 miles to the southeast, where it terminates near the northern toe slopes of Mt. Gunnison.

11. Associated Artifacts:

None

12. Associated Features or Resources:

None

III. Research Information**13. Architect/Engineer:** Unknown

Source(s) of Information:

14. Builder: Unknown

Source(s) of Information:

15. Date of Construction / Date Range: Pre-1885

Source(s) of Information: 1885 GLO map for Township 13 South, Range 90 West

16. Historical / Archival Data:

A trail that generally follows the same alignment as 5GN6494.1 along Minnesota Creek is visible on an 1885 GLO map for Township 13 South, Range 90 West (GLO 1885). Some portions of the 1885 trail are on the opposite side of the creek as the current alignment. 5GN6494.1 also appears as the Hammond Trail on a 1938 Mount Gunnison 1:62,500 topographic map (USGS 1938). The 1938 map suggests that the route originally connected the town of Paonia to Hammond Cow Camp (5GN6496) and then continued east/southeast until it intersected a trail in Coal Creek. The road appears to be well established by 1963, based on a historical aerial image (USGS 1963).

17. Cultural Affiliation and Justification:

Historic American

IV. Management Recommendations**18. Eligibility of Entire Resource**☒ Eligible ☐ Not Eligible ☐ Need Data Is this an official determination? ☐ Yes ☒ No

Linear Component Form

Resource Number: 5GN6494.1

Temporary Resource Number: 10701-KC02.1

Remarks/Justification: Although ERO did not survey the entire road corridor, aerial overviews and archival sources were used to evaluate eligibility for its entire length. ERO recommends the entire Minnesota Creek Road alignment as eligible for listing in the NRHP under Criterion A. The road appears to have been built over a trail along the Dry Fork of Minnesota Creek, which served as an early transportation corridor from Paonia to Coal Creek. It most likely served as the main access from the town of Paonia to the Gunnison National Forest, which was established in 1905. The road may be noteworthy for a potential association with coal mining development in Gunnison County (Criterion A) and/or an association with early ranching activity because it served as a transportation corridor among farms in the North Fork Valley and higher elevation grazing areas. The road is not known to be associated with any historically significant individuals (Criterion B). The road does not have engineering significance (design, materials, and workmanship; Criterion C). No significant information potential remains (Criterion D).

19. Evaluation of integrity of the segment of the entire linear resource being recorded

(Complete only if "Segment" under item 4 is checked and the entire resource is marked as Eligible under item 18)

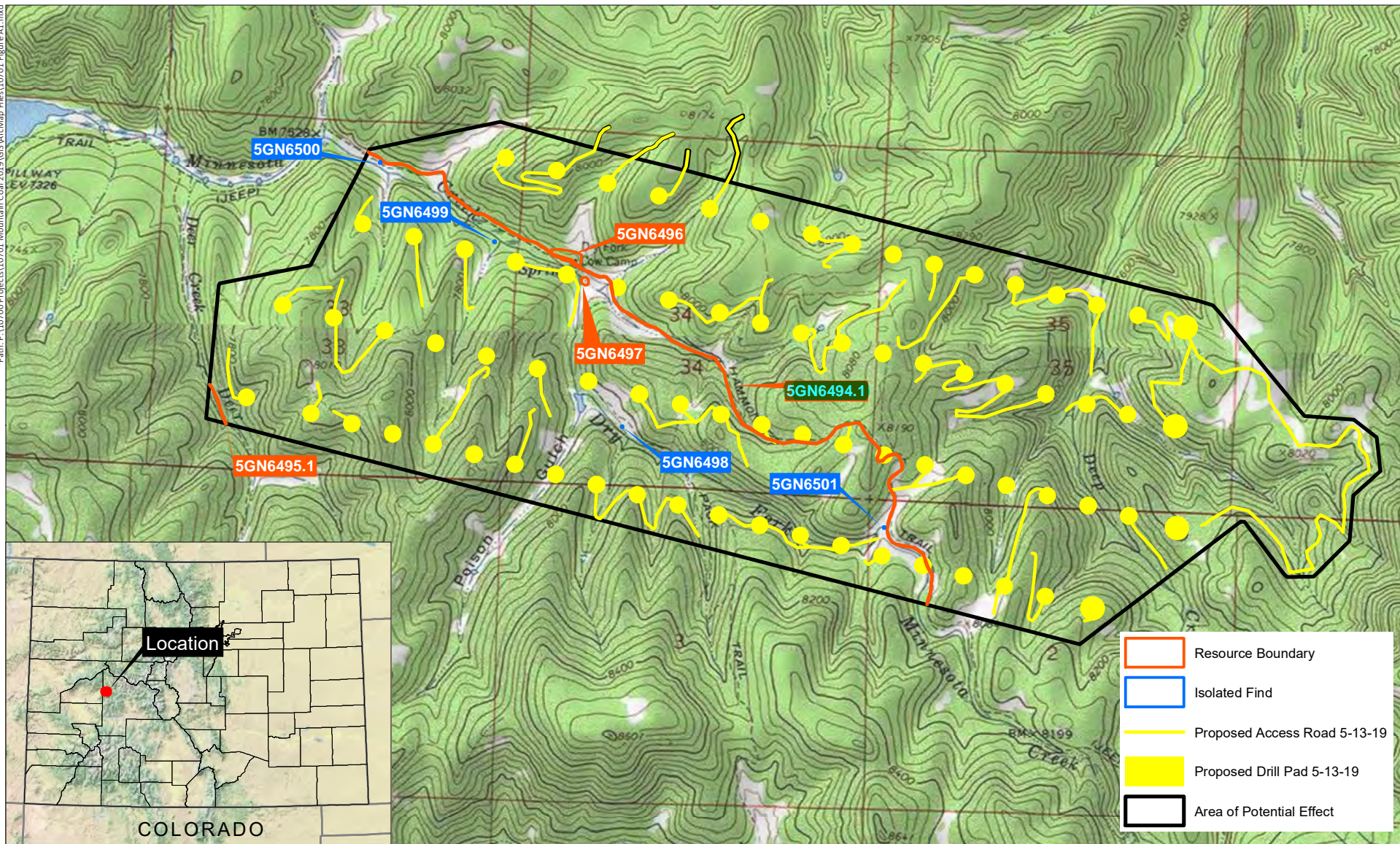
☐ Supporting ☒ Non-supporting ☐ Not applicable

Remarks/Justification: Segment 1 is recommended as non-supporting of the overall eligibility of the entire resource.

20. Recorder(s): Kathy Croll, Matthew Howryla, Justin Batista

21. Date: 6/10/2019

History Colorado - Office of Archaeology & Historic Preservation
1200 Broadway, Denver, CO 80203
303-866-3395



Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

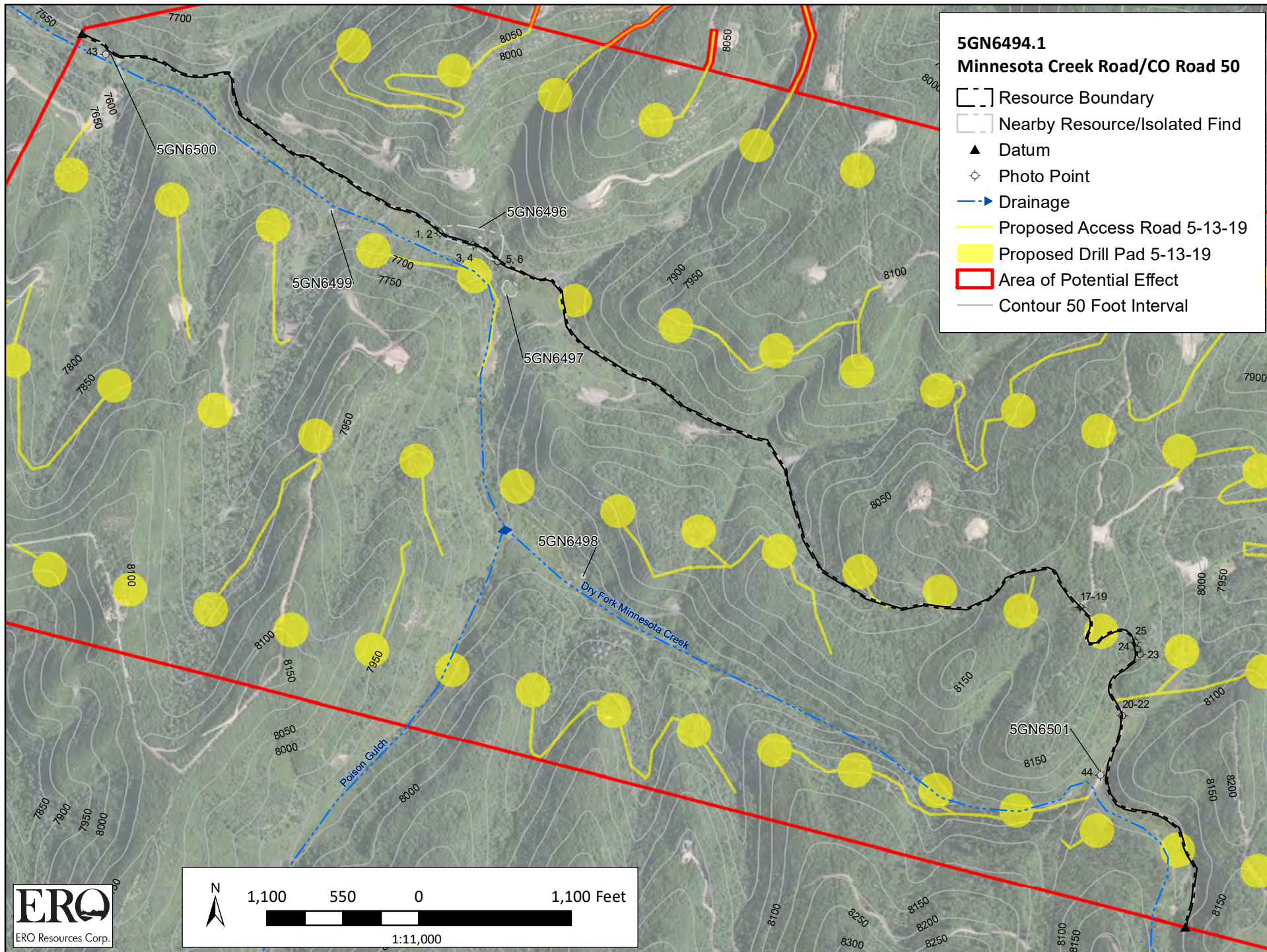
Sections 27, and 33-36, T13S, R90W; 6th PM
Sections 1-4, T14S, R90W; 6th PM
USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
Gunnison County, Colorado

0 1,000 2,000
Feet
1:24,000

Figure A1
Resource Locations

Prepared for: Mountain Coal Company, LLC
File: 10701 Figure A1.mxd (MH)
July 2, 2019

ERO
ERO Resources Corp.



For Official Use Only: Disclosure of site locations prohibited (43 CFR 7.18)



**5GN6494.1 – Segment overview, Hammond Trail (Minnesota Creek Road/CR50), view to the east.
Photo Number: K.1040001 Date: 6.10.19**



**5GN6494.1 – Segment overview, Hammond Trail (Minnesota Creek Road/CR50), view to the west.
Photo Number: K.1040002 Date: 6.10.19**



**5GN6494.1 – Segment overview, Hammond Trail (Minnesota Creek Road/CR50), view to the east.
Photo Number: K.1040003 Date: 6.10.19**



**5GN6494.1 – Segment overview, Hammond Trail (Minnesota Creek Road/CR50), view to the west.
Photo Number: K.1040004 Date: 6.10.19**



**5GN6494.1 – Segment overview, Hammond Trail (Minnesota Creek Road/CR50), view to the west.
Photo Number: K.1040005 Date: 6.10.19**



**5GN6494.1 – Segment overview, Hammond Trail (Minnesota Creek Road/CR50), view to the east.
Photo Number: K.1040006 Date: 6.10.19**



**5GN6494.1 – Segment overview, Hammond Trail (Minnesota Creek Road/CR50), view to the northwest.
Photo Number: K.1040017 Date: 6.11.19**



**5GN6494.1 – Segment overview, Hammond Trail (Minnesota Creek Road/CR50), view to the southeast.
Photo Number: K.1040019 Date: 6.11.19**

Management Data Form

A Management Data Form should be completed for each cultural resource recorded during an archaeological survey. Isolated finds and revisits are the exception and they do not require a Management Data Form. Please attach the appropriate component forms and use continuation pages if necessary. Fields can be expanded or compressed as necessary.

1. Resource Number: 5GN6495.1**2. Temporary Resource Number:** 10701-KC04.1**3. Attachments (check as many as apply)**

- ☐ Prehistoric Archaeological Component
☐ Historic Archaeological Component
☒ Linear Component
☒ Sketch/Instrument Map (required)
☒ U.S.G.S. Map Photocopy (required)
☒ Photograph(s) (required)
☐ Other, Specify:

4. Official Determination (OAHP use only)

- ☐ Determined Eligible NR/SR _____
☐ Determined Not Eligible NR/SR _____
☐ Nominated _____
☐ Need Data NR/SR _____
☐ Contributing to NR Dist./SR Dist _____
☐ Not Contributing to NR Dist./SR Dist _____
☐ Supports overall linear eligibility NR/SR _____
☐ Does not supports overall linear eligibility NR/SR _____

I. IDENTIFICATION**5. Resource Name:** Deer Creek Road segment**6. Project Name/Number:** Mountain Coal Future B Seam (Project 10701)**7. Government Involvement:** ☐ Local ☐ State ☒ Federal

Agency: Grand Mesa, Uncompahgre, and Gunnison National Forests

8. Site Categories (check as many as apply):

Prehistoric: ☐ archaeological site ☐ paleontological site ☐ In existing National Register district
 National Register district name:
 Historic: ☐ archaeology site ☐ building(s) ☒ structure(s) ☐ object(s) ☐ In existing National Register district
 National Register District name

9. Owner(s) Name and Address Grand Mesa, Uncompahgre, and Gunnison National Forests
 2777 Crossroads Boulevard, Unit 1
 Grand Junction, Colorado 81506

10. Boundary Description and Justification: Extent of the road within the APE

No further work upon concurrence with the not eligible recommendation. Additionally, based on current design for the placement of MVB pads and roads, this resource would not be affected by any of the proposed construction.

11. Site/Property Dimensions: Length: 187m Width: 3.7m Area: 683m² Ac: 0.169
 Area was calculated as: ☐ Length x Width (rectangle/square) ☐ Length x Width x 0.785 (ellipse) ☒ GIS

II. LOCATION**12. Legal Location**

PM: 6th Township: 13S Range: 90W Section: 33 SW 1/4 of SW 1/4

If section is irregular, explain alignment method:

13. USGS Quad(s) Minnesota Pass, CO**14. County(ies):** Gunnison**15. UTM Coordinates:** Datum used ☐ NAD 27 ☒ NAD 83 ☐ WGS 84 ☐ Other:

A. Zone	13	286,660 mE	4,305,514 mN
B. Zone	13	286,661 mE	4,305,518 mN
C. Zone	13	286,736 mE	4,305,345 mN
D. Zone	13	286,731 mE	4,305,347 mN

16. UTM Source: ☒ Corrected GPS/rectified survey (<5m error) ☐ Uncorrected GPS ☐ Map template

Management Data Form

Resource Number: 5GN6495.1

Temporary Resource Number: 10701-KC04.1

Other (explain):

17. Site elevation (feet): 7,640

18. Address

Lot:

Block:

Addition:

19. Location/Access From Paonia CO, drive east along Minnesota Creek Road until the intersection of Forest Service Roads 710A and 711. Take a left to FSR 711 and continue for approximately 2.22 miles, passing the Minnesota Reservoir to your north. At a fork in the road, go south on Deer Creek Road for .5-mile to the beginning of the segment.

III. NATURAL ENVIRONMENT/SITE CONDITION

20. General Description should include both on-site as well as geographical setting with aspect, landforms, vegetation, soils, depositional environment, water, ground visibility):

5GN6495.1 is a segment of Deer Creek road located west of the town of Paonia. Surrounding vegetation consists of dense stands of scrub oak and chokecherry, with dense stands of willow found along the riparian areas. Ground visibility is 30 to 60 percent.

21. Soil depth (cm) and description:

Soils in the drainage consist of a very deep and well drained loam formed in slope alluvium (NRCS 2019).

22. Condition

a. Architectural/Structural

- ☐ Excellent
- ☒ Good
- ☐ Fair
- ☐ Deteriorated
- ☐ Ruin

b. Archaeological/Paleontological

- ☐ Undisturbed
- ☐ Light disturbance
- ☐ Moderate disturbance
- ☐ Heavy disturbance
- ☐ Total disturbance

23. Describe condition:

The earthen road is in good condition.

24. Vandalism: ☐ Yes ☒ No

Describe:

IV. NATIONAL/STATE REGISTER ELIGIBILITY ASSESSMENT

25. Context or Theme(s): Linear Resources (Späth 2007)

26. Applicable National Register Criteria:

- ☐ A. Associated with events that have made a significant contribution to the broad pattern of our history
- ☐ B. Associated with the lives of persons significant in our past
- ☐ C. Embodies 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
- ☐ D. Has yielded, or may be likely to yield, information important in history or prehistory
- ☒ Does not meet any of the National Register criteria
- ☐ Qualifies under exceptions A through G. List exception(s):

27. Applicable State Register Criteria:

- ☐ A. Property is associated with events that have made a significant contribution to history
- ☐ B. Property is connected with persons significant in history
- ☐ C. Property has distinctive characteristics of a type, period, method of construction or artisan
- ☐ D. Property is of geographic importance
- ☐ E. Property contains the possibility of important discoveries related to prehistory or history
- ☒ Does not meet any of the State Register criteria

Management Data Form

Resource Number: 5GN6495.1

Temporary Resource Number: 10701-KC04.1

28. Areas of significance:

Transportation

29. Periods of significance:

Since the resource is recommended not eligible, period of significance is not relevant.

30. Level of significance: ☐ National ☐ State ☐ Local

31. Statement of significance:

Although ERO did not survey the entire road, aerial overviews and archival sources were used to evaluate eligibility. ERO recommends the entire Deer Creek Road alignment as not eligible for listing in the NRHP. The road first appears on two USGS topographic maps in 1964 (USGS 1964), and the road does not appear to have played an important role in the development of the area. The trail was not historically an important transportation corridor. Segment 5GN6495.1 is not known to be associated with important historical events or persons (Criteria A and B). The road does not have engineering significance (design, materials, and workmanship; Criterion C). No significant information potential remains (Criterion D).

32. Statement of historic integrity related to significance (reference Location, Design, Setting, Materials, Workmanship, Feeling, and Association):

Because the resource is recommended not eligible for listing in the NRHP, a discussion of integrity is unnecessary.

33. National Register Eligibility Field Assessment:

Linear Segment Evaluation (if applicable):

<input type="checkbox"/> Eligible	<input checked="" type="checkbox"/> Not eligible	<input type="checkbox"/> Need data
<input type="checkbox"/> Supporting	<input type="checkbox"/> Non-supporting	
<input type="checkbox"/> Contributing	<input type="checkbox"/> Non-contributing	
<input type="checkbox"/> Eligible	<input checked="" type="checkbox"/> Not eligible	<input type="checkbox"/> Need data
<input type="checkbox"/> Contributing	<input type="checkbox"/> Non-contributing	

34. Status in an existing National Register District:

35. State Register Eligibility Field Assessment:

36. Status in an existing State Register District:

37. National/State Register District Potential: ☐ Yes ☒ No Describe:

Insufficient density of sites, structures, buildings, or objects exists within the area to constitute a historic district.

38. Cultural Landscape Potential: ☐ Yes ☒ No Describe:

No cultural landscape potential.

39. If Yes to either 37 or 38, is this site: ☐ Contributing ☐ Non-contributing Explain:

V. MANAGEMENT AND ADMINISTRATIVE DATA

40. Threats to Resource ☐ Water erosion ☐ Wind erosion ☐ Grazing ☐ Neglect ☐ Vandalism
☒ Recreation ☐ Construction ☐ Other (explain):

41. Existing protection: ☐ None ☐ Marked ☐ Fenced ☐ Patrolled ☒ Access controlled
☐ Other (specify):

Comments:

42. Local landmark designation:

43. Easement:

44. Recorder's Management Recommendations: No further work

Management Data Form

Resource Number: 5GN6495.1

Temporary Resource Number: 10701-KC04.1

VI. DOCUMENTATION

45. Previous actions accomplished at the site: ☐ Tested ☐ Partial excavation ☐ Complete excavation

Date(s):

a. Excavations:

b. Stabilization:

c. HABS/HAER documentation [date(s) and numbers]:

d. Other:

46. Known collections/reports/interviews and other references (list):

Natural Resources Conservation Service (NRCS)

2019 Web Soil Survey. Electronic document, <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>, accessed June 28, 2019.

United States Geological Survey (USGS)

1963 Historical Aerial, Entity ID: AR1VAQR00010034. Electronic Document: <https://earthexplorer.usgs.gov/>. Last Accessed June 26, 2019.

1964a Somerset, Colorado Map. 1:24,000 (Topographic). U.S. Department of the Interior Geological Survey.

1964b Minnesota Pass, Colorado Map. 1:24,000 (Topographic). U.S. Department of the Interior Geological Survey.

47. Primary location of additional data: ERO Resources Corporation

48. State or Federal Permit number: CAN715HR

49. Collection: Artifact collection authorized: ☐ Yes ☒ No Were artifacts collected? ☐ Yes ☒ No

Artifact repository:

Collection method: ☐ Diagnostics ☐ Grab ☐ Random Sample

Other (specify):

50. Photograph Numbers: K.1040041-042

Files or negatives stored at: ERO Resources Corporation

51. Report Title: Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision #TR-147, Gunnison County, Colorado

52. Recorder(s): Kathy Croll, Matthew Howryla, Justin Batista

Date: 6/13/2019

53. Recorder affiliation: ERO Resources Corporation - Denver/Durango

Phone number/Email: 303.830.1188 / 970.422.2136

Note: Please attach a site map, a photocopy of the USGS 1:24000 map indicating resource location, and photographs.

Colorado Historical Society - Office of Archaeology & Historic Preservation
1200 Broadway, Denver, CO 80203
303-866-3395

Linear Component Form

This form should be completed for each linear resource or linear segment. Use this form in conjunction with the Management Data Form. Call OAHP staff (303-866-5216) prior to assigning a resource number.

I. Resource Identification**1. Resource Number:** 5GN6495.1**2. Temporary Resource Number:** 10701-KC04.1**3. Site Name:** Deer Creek Road segment**4. Record of:** ☐ Entire resource ☒ Segment**Segment No:** 1**II. Resource Description****5. Resource Type:** ☒ Road ☐ Railroad ☐ Trail ☐ Ditch/Canal ☐ Other (specify):**6. Component Description:**

Deer Creek Road begins at the T intersection with Forest Service Road 711, approximately 0.5 miles east of the Minnesota Reservoir Dam. Segment 1 is approximately 0.1 miles long and 16 feet wide. The road is a dirt road with narrow shoulders (less than 12 inches).

7. Original Use: Transportation**8. Current Use:** Transportation**9. Modifications (describe and include dates):**

Unknown

10. Extent of Entire Resource:

The full-extent of Deer Creek Road is .6-mile.

11. Associated Artifacts:

None

12. Associated Features or Resources:

None

III. Research Information**13. Architect/Engineer:** Unknown

Source(s) of Information:

14. Builder: Unknown

Source(s) of Information:

15. Date of Construction / Date Range: Pre-1963

Source(s) of Information: USGS 1963, 1964a, 1964b

16. Historical / Archival Data:

The earliest evidence of a trail along Deer Creek occurs on a 1963 historical aerial map (USGS 1963). The alignment is not well defined on this aerial map. The first formal reference to a trail appears on the 1964 Somerset and Minnesota Pass, Colorado, USGS topographic maps (USGS 1964a, 1964b). It is likely that the road was created with the expansion and development of nearby coal mining and grazing activities on the GMUG.

17. Cultural Affiliation and Justification:

Historic American

IV. Management Recommendations**18. Eligibility of Entire Resource**☐ Eligible ☒ Not Eligible ☐ Need Data Is this an official determination? ☐ Yes ☒ No

Remarks/Justification: Although ERO did not survey the entire road, aerial overviews and archival sources were used to evaluate eligibility. ERO recommends the entire Deer Creek Road alignment as not eligible for listing in the NRHP. The road first appears on two USGS topographic maps in 1964 (USGS 1964), and the road does not appear to have played an important role in the development of the area. The trail was not historically an important transportation corridor. Segment 5GN6495.1 is not known to be associated with important historical events or persons (Criteria A and B). The road does not have engineering significance (design, materials, and workmanship; Criterion C). No significant

Linear Component Form

Resource Number: 5GN6495.1

Temporary Resource Number: 10701-KC04.1

information potential remains (Criterion D).

19. Evaluation of integrity of the segment of the entire linear resource being recorded

(Complete only if "Segment" under item 4 is checked and the entire resource is marked as Eligible under item 18)

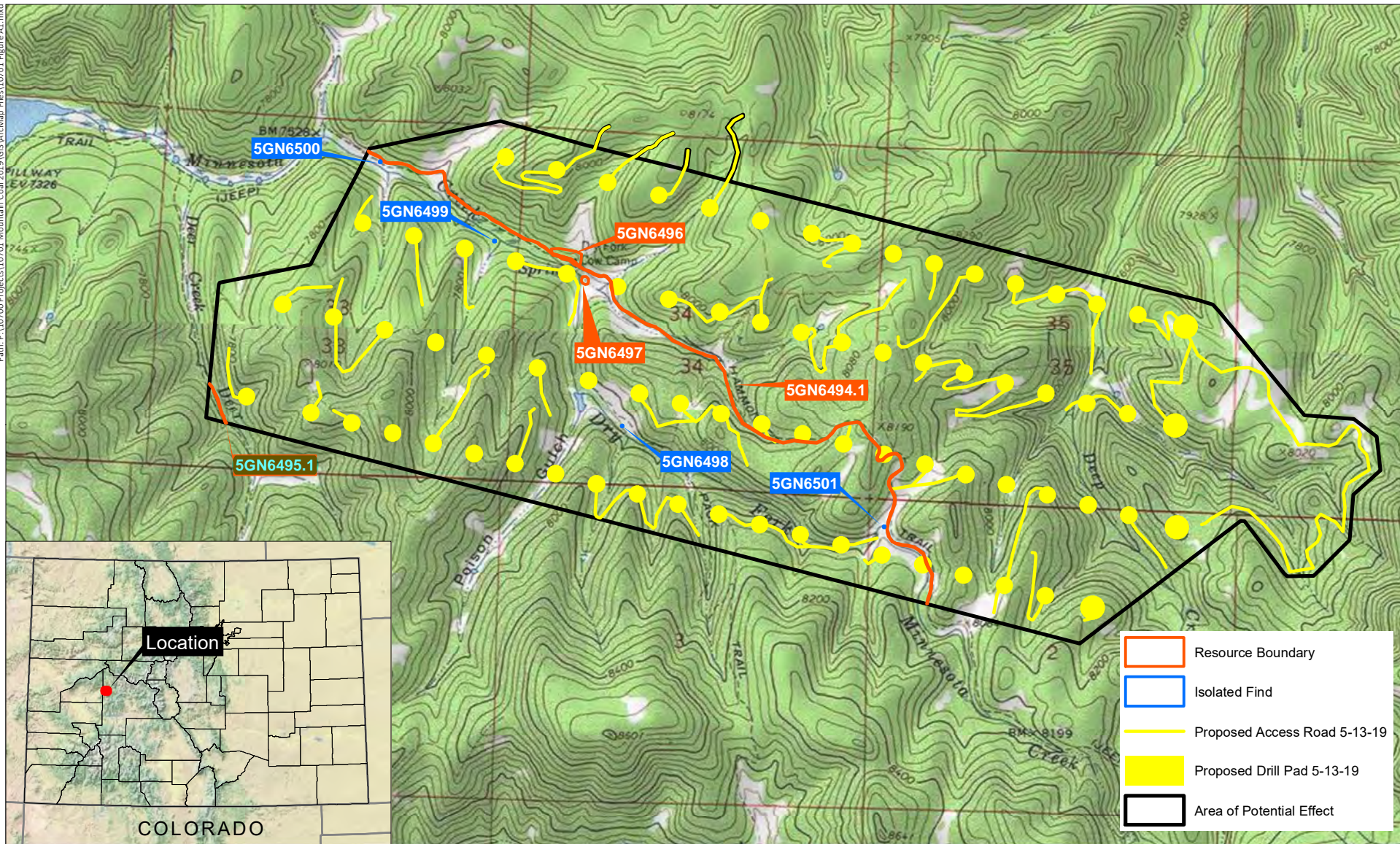
☐ Supporting ☐ Non-supporting ☐ Not applicable

Remarks/Justification: Because the resource is recommended not eligible for listing in the NRHP, segment evaluation is not necessary.

20. Recorder(s): Kathy Croll, Matthew Howryla, Justin Batista

21. Date: 6/13/2019

History Colorado - Office of Archaeology & Historic Preservation
1200 Broadway, Denver, CO 80203
303-866-3395



Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM
 Sections 1-4, T14S, R90W; 6th PM
 USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
 Gunnison County, Colorado

0 1,000 2,000
 Feet
 1:24,000

Figure A1
Resource Locations

Prepared for: Mountain Coal Company, LLC
 File: 10701 Figure A1.mxd (MH)
 July 2, 2019

ERO
 ERO Resources Corp.





**5GN6495.1 – Segment overview, Deer Creek Road, view to the southwest.
Photo Number: K.1040041 Date: 6.13.19**



**5GN6495.1 – Segment overview, Deer Creek Road, view to the northeast.
Photo Number: K.1040042 Date: 6.13.19**

Management Data Form

A Management Data Form should be completed for each cultural resource recorded during an archaeological survey. Isolated finds and revisits are the exception and they do not require a Management Data Form. Please attach the appropriate component forms and use continuation pages if necessary. Fields can be expanded or compressed as necessary.

1. Resource Number: 5GN6496**2. Temporary Resource Number:** 10701-KC01**3. Attachments (check as many as apply)**

- ☐ Prehistoric Archaeological Component
☒ Historic Archaeological Component
☐ Linear Component
☒ Sketch/Instrument Map (required)
☒ U.S.G.S. Map Photocopy (required)
☒ Photograph(s) (required)
☐ Other, Specify:

4. Official Determination (OAHP use only)

- ☐ Determined Eligible NR/SR _____
☐ Determined Not Eligible NR/SR _____
☐ Nominated _____
☐ Need Data NR/SR _____
☐ Contributing to NR Dist./SR Dist _____
☐ Not Contributing to NR Dist./SR Dist _____
☐ Supports overall linear eligibility NR/SR _____
☐ Does not supports overall linear eligibility NR/SR _____

I. IDENTIFICATION**5. Resource Name:** Hammond Cow Camp/Dry Fork Cow Camp**6. Project Name/Number:** Mountain Coal Future B Seam (Project 10701)**7. Government Involvement:** ☐ Local ☐ State ☒ Federal

Agency: Grand Mesa, Uncompahgre, and Gunnison National Forests

8. Site Categories (check as many as apply):

Prehistoric: ☐ archaeological site ☐ paleontological site ☐ In existing National Register district
 National Register district name:

Historic: ☒ archaeology site ☒ building(s) ☒ structure(s) ☐ object(s) ☐ In existing National Register district
 National Register District name

9. Owner(s) Name and Address Grand Mesa, Uncompahgre, and Gunnison National Forests
 2777 Crossroads Boulevard, Unit 1
 Grand Junction, Colorado 81506

10. Boundary Description and Justification: Extent of surface artifacts and features

11. Site/Property Dimensions: Length: 130m Width: 42m Area: 5746.7m² Ac: 1.42
 Area was calculated as: ☐ Length x Width (rectangle/square) ☐ Length x Width x 0.785 (ellipse) ☒ GIS

II. LOCATION**12. Legal Location**

PM: 6th Township: 13S Range: 90W Section: 34 SW 1/4 of NW 1/4

If section is irregular, explain alignment method:

13. USGS Quad(s) Somerset, CO**14. County(ies):** Gunnison**15. UTM Coordinates:** Datum used ☐ NAD 27 ☒ NAD 83 ☐ WGS 84 ☐ Other:

A. Zone 13 288,248 mE 4,306,059 mN

16. UTM Source: ☒ Corrected GPS/rectified survey (<5m error) ☐ Uncorrected GPS ☐ Map template
 Other (explain):

17. Site elevation (feet): 7,675**18. Address** Colorado Road 50 Lot: Block: Addition:

Management Data Form

Resource Number: 5GN6496

Temporary Resource Number: 10701-KC01

Somerset, Colorado
814434

19. Location/Access From Paonia CO, drive east along Minnesota Creek Road until the intersection of Forest Service Roads 710A and 711. Take a left to FSR 711 and continue for approximately 2.6 miles, passing the Minnesota Reservoir to your north until the road intersects with CR 50. Take CR 50 and drive southeast for 0.8 miles. The cow camp is on the north side of the road.

III. NATURAL ENVIRONMENT/SITE CONDITION

20. General Description should include both on-site as well as geographical setting with aspect, landforms, vegetation, soils, depositional environment, water, ground visibility):

5GN6496 is a historical grazing camp located at the base of a steep south-facing slope on the northern terrace of the Dry Fork of Minnesota Creek, east of the town of Paonia. On-site vegetation consists of dense stands of scrub oak and choke cherry on the upland portions of the site and dense stands of willow in the riparian areas adjacent to the Dry Fork of Minnesota Creek. The ground visibility is 30 to 60 percent.

21. Soil depth (cm) and description:

Soils are a very deep and well drained loam formed in slope alluvium (NRCS 2019).

22. Condition

a. Architectural/Structural

- ☐ Excellent
- ☒ Good
- ☐ Fair
- ☐ Deteriorated
- ☐ Ruin

b. Archaeological/Paleontological

- ☐ Undisturbed
- ☐ Light disturbance
- ☐ Moderate disturbance
- ☐ Heavy disturbance
- ☐ Total disturbance

23. Describe condition:

The cabin has been continually maintained and is currently in use, and it is, therefore, in good condition. Visible exterior alterations include recent replacement of the front door, most windows, and the roof with modern metal materials.

24. Vandalism: ☐ Yes ☒ No

Describe:

IV. NATIONAL/STATE REGISTER ELIGIBILITY ASSESSMENT

25. Context or Theme(s): Agriculture (Church and Clark 2007)

26. Applicable National Register Criteria:

- ☒ A. Associated with events that have made a significant contribution to the broad pattern of our history
- ☐ B. Associated with the lives of persons significant in our past
- ☐ C. Embodies 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
- ☒ D. Has yielded, or may be likely to yield, information important in history or prehistory
- ☐ Does not meet any of the National Register criteria
- ☐ Qualifies under exceptions A through G. List exception(s):

27. Applicable State Register Criteria:

- ☒ A. Property is associated with events that have made a significant contribution to history
- ☐ B. Property is connected with persons significant in history
- ☐ C. Property has distinctive characteristics of a type, period, method of construction or artisan
- ☐ D. Property is of geographic importance
- ☒ E. Property contains the possibility of important discoveries related to prehistory or history
- ☐ Does not meet any of the State Register criteria

Management Data Form

Resource Number: 5GN6496

Temporary Resource Number: 10701-KC01

28. Areas of significance:

Archaeology: Historic - Non-Aboriginal

Agriculture

29. Periods of significance:

1930s-1960s

30. Level of significance: ☐ National ☒ State ☒ Local

31. Statement of significance:

ERO recommends 5GN6496 as eligible for listing in the NRHP under Criteria A and D. The site is associated with development of grazing programs on the GMUG. Archival research did not indicate the grazing camp is known to be associated with any historically significant individuals (Criterion B), nor do any constructed features embody a distinctive architectural design or any unique aspects of craftsmanship or engineering (Criterion C). Cultural materials dumped into the privy (F7) have potential to yield information important to interpreting the history of the camp (Criterion D).

32. Statement of historic integrity related to significance (reference Location, Design, Setting, Materials, Workmanship, Feeling, and Association):

Integrity of location, setting, feeling, design, and association have largely remained intact, due to the continued use of the camp for its original purpose as a camp for grazing allottees on the GMUG. The aspects of workmanship and materials have been minimally impacted by the small upgrades to the cabin, but these aspects remain largely intact.

33. National Register Eligibility Field Assessment:

Linear Segment Evaluation (if applicable):

☒ Eligible

☐ Not eligible

☐ Need data

☐ Supporting

☐ Non-supporting

34. Status in an existing National Register District:

☐ Contributing

☐ Non-contributing

35. State Register Eligibility Field Assessment:

☒ Eligible

☐ Not eligible

☐ Need data

36. Status in an existing State Register District:

☐ Contributing

☐ Non-contributing

37. National/State Register District Potential: ☐ Yes ☒ No Describe:

Insufficient density of sites, structures, buildings, or objects exists within the area to constitute a historic district.

38. Cultural Landscape Potential: ☐ Yes ☒ No Describe:

No cultural landscape potential.

39. If Yes to either 37 or 38, is this site: ☐ Contributing ☐ Non-contributing Explain:

V. MANAGEMENT AND ADMINISTRATIVE DATA

40. Threats to Resource ☐ Water erosion ☐ Wind erosion ☐ Grazing ☒ Neglect ☐ Vandalism
☒ Recreation ☐ Construction ☐ Other (explain):

41. Existing protection: ☐ None ☐ Marked ☐ Fenced ☐ Patrolled ☒ Access controlled
☐ Other (specify):

Comments:

42. Local landmark designation:

43. Easement:

44. Recorder's Management Recommendations: Avoid and protect

Management Data Form

Resource Number: 5GN6496

Temporary Resource Number: 10701-KC01

The current design for the placement of MVB pads and roads will not impact this resource.

VI. DOCUMENTATION

45. Previous actions accomplished at the site: ☐ Tested ☐ Partial excavation ☐ Complete excavation

Date(s):

a. Excavations:

b. Stabilization:

c. HABS/HAER documentation [date(s) and numbers]:

d. Other:

46. Known collections/reports/interviews and other references (list):

Natural Resources Conservation Service (NRCS)

2019 Web Soil Survey. Electronic document, <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>, accessed June 28, 2019.

U.S. Department of Agriculture, Forest Service

2007 "Dry Fork Improvements." Internal Forest Service Documentation.

United States Geological Survey (USGS)

1938 Mt. Gunnison, Colorado Map. 1:62,500 (Topographic). U.S. Department of the Interior Geological Survey.

1963 Historical Aerial, Entity ID: AR1VAQR00010034. Electronic Document: <https://earthexplorer.usgs.gov/>. Last Accessed June 26, 2019.

47. Primary location of additional data: ERO Resources Corporation

48. State or Federal Permit number: CAN715HR

49. Collection: Artifact collection authorized: ☐ Yes ☒ No Were artifacts collected? ☐ Yes ☒ No

Artifact repository:

Collection method: ☐ Diagnostics ☐ Grab ☐ Random Sample

Other (specify):

50. Photograph Numbers: K1030979-999, 1040007-008

Files or negatives stored at: ERO Resources Corporation

51. Report Title: Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision #TR-147, Gunnison County, Colorado

52. Recorder(s): Kathy Croll, Matthew Howryla, Justin Batista

Date: 6/10/2019

53. Recorder affiliation: ERO Resources Corporation - Denver/Durango

Phone number/Email: 303.830.1188 / 970.422.2136

Note: Please attach a site map, a photocopy of the USGS 1:24000 map indicating resource location, and photographs.

Colorado Historical Society - Office of Archaeology & Historic Preservation
1200 Broadway, Denver, CO 80203
303-866-3395

COLORADO CULTURAL RESOURCE SURVEY
Historic Archaeology Component Form

OAHP1402
Rev. 11/10

1. Resource Number: 5GN6496 2. Temporary Resource Number: 10701-KC01
3. Site Name: Hammond Cow Camp/Dry Fork Cow Camp

4. Does this form pertain to the site in general? ☒ Yes ☐ No

If no, please supply a feature/structure number or name: Site

5. Site, Component, or Feature Type: Cow Camp

6. Narrative History (based on archival research, expand as necessary):

5GN6496 appears on a 1938 Mount Gunnison 1:62,500 topographic map as the Hammond Cow Camp (USGS 1938). Forest Service records indicate the spring (F2) was constructed in 1935 and the cabin (F1) was constructed in 1940 (USDA Forest Service 2007). The structure has remained in the same location, according to historical aeriels, and still serves as a water source for cattle that graze on Forest Service land. The new door and windows on the cabin and modern gates F5 and F8 show that the site has been maintained, but the overall design and materials of the site have not been significantly modified. The camp is still used for the same purpose as when originally built. Building materials and weathering indicate that the cabin and associated features F4 (potentially) and F5 were constructed during the same period; therefore, features F1, F4, and F5 contribute to the eligibility of the resource.

7. Is this site located in a NRHP historic landscape? ☐ Yes ☒ No If yes, please describe:

8. Component or Feature Description (expand as necessary):

The camp is located along County Road 50 (5GN6494.1) and consists of eight features. Feature 1 (F1) is a one-story wood-frame cabin. The rectangular foundation is constructed of concrete and native stone and measures 34.75 by 15.75 feet. Exterior walls are clad with vertical lumber board siding (batten board). The entrance is off center on the south elevation and covered with a paneled metal door with multiple lights in the top half. The door is elevated slightly over a small concrete pad porch that is flush to the ground. The front-gabled roof extends almost 4 feet over the porch, and the roof extension features decorative saw tooth-shaped trim. On the east side of the porch a concrete block chimney is exposed along the exterior of the south elevation and through the slope of the roof extension. The roof is covered with lapped seam steel sheets and features exposed rafter tails. On the rear (north) elevation of the building is a shed addition measuring 8 feet by 16 feet wide; it has a separate entrance covered with a vertical board door on its west side. Window fenestrations include a wood-framed sliding window centered on the south elevation, two aluminum-framed sliding windows on the east elevation, and one aluminum-framed sliding window on the west elevation. The cabin has been continually maintained and is currently in use, and it is, therefore, in good condition. Visible exterior alterations include recent replacement of the front door, most windows, and the roof with modern metal materials.

F2 is a water catchment feature to the east of the main cabin on a small drainage that includes an outlet of PVC pipe into two troughs; active and/or abandoned components of the features appear to be made from salvaged and modified materials, including a water softener. F3 is a fire ring made of local stone. The fire ring contains modern trash.

F4 is a wood-framed outhouse measuring 5 feet by 3 feet. The walls are constructed of vertical lumber boards, and the shed roof is covered with asphalt roll. Recent repairs include use of corrugated steel sheets to patch exterior damages.

F5 is a loafing shed with an enclosed storage area and a small corral located at the center of the site. Exterior walls are clad with vertical lumber boards (batten board), and plywood is visible in the interior of the open livery. The south wall of the livery portion of the shed is uncovered (about 12 feet by 15 feet), and the east third of the shed is fully enclosed (8 feet by 15 feet). The building has a concrete-footing foundation in a rectangular plan that measures 20 feet by 15 feet. The attached corral is constructed of a variety of materials, including steel tube gates, chain link fence, timbers and unhewn logs, and bailing wire.

F6 is a fence line oriented east-to-west north of the features and includes a gate. It is constructed of rebar, barbed wire, and timbers. F7 is a circular depression measuring approximately 3 feet in diameter and 3 to 6 inches deep; it is a possible privy location.

F8 is a corral complex that measure 75 feet by 45 feet and includes an inner division in the southwest corner; the complex is constructed primarily of unhewn logs and bailing wire; gates are constructed from milled lumber and steel tubes. A large rectangular fiberglass water trough that is fed by a PVC pipe is located in the northeast portion of the corral.

9. Historic Component Date(s): 1935-1940

Justification and Sources Consulted: USGS 1938; USDA, Forest Service 2007

10. Component Function(s):

Historic Archaeology Component Form

Resource Number: 5GN6496

Temporary Resource Number: 10701-KC01

Original Use: Cattle grazing camp

Present Use: Cattle grazing camp

11. Ethnic affiliation of occupants: Unknown

Justification and Sources Consulted:

12. Historic Boundary Description: Boundary is based on extent of main building and associated features

Justification and Sources Consulted:

13. NRHP Area of Significance: Agriculture

Justification and Sources Consulted: USGS 1938; USDA, Forest Service 2007

14. NRHP Period of Significance: 1935-1960s

Justification and Sources Consulted: USGS 1938; USDA, Forest Service 2007

15. Site, Component, or Feature Theme (use the Historic Archaeology Lexicon):

Rural Agriculture: Ranching

The camp is still used for the same purposes as when originally built, as a cattle grazing camp.

16. Does this component or feature support the NRHP eligibility of the entire resource?

☒ Yes

☐ No

☐ Undetermined

☐ N/A

Justification: The site is associated with development of grazing programs on the GMUG and cultural materials dumped into the privy (F7) have potential to yield information important to interpreting the history of the camp (Criterion D).

17. Recorder(s): Kathy Croll, Matthew Howryla, Justin Batista

18. Date: 6/10/2019

19. Presence and Quantity of Artifacts

None

20. Total assemblage size: Or estimate: ☐ 0-10 ☐ 11-100 ☐ 101-1,000 ☐ 1,001-10,000 ☐ >10,000

21. Artifact Density ☐ High ☐ Medium ☐ Low Describe:

22. Unique Artifact Descriptions. Particularly important attributes are listed following the artifact class and standardized terminology can be found in the Appendix to the instructions. Expand or contract tables as necessary. All of these items should be included in the counts of the Artifacts table above.

None

23. Are standing structures present on the site? ☒ Yes ☐ No

If yes, please complete Architectural Inventory Form(s) (1403)

24. Feature Descriptions Include a site map, to scale, with each feature listed below depicted on it. Please use the Historic Archaeology Lexicon for feature types. Insert rows and feature types into table as necessary. If desired, sort table by feature number.

Feature Type (add others as necessary)	Feature Number/Name	Dimensions (feet / inches)	Description
Cabin	F1	34.75 feet long and 15.75 feet wide	See narrative.
Water catchment feature	F2	6 feet long and 2 feet wide	See narrative.
Fire ring	F3	2.5 feet long and 2.5 feet wide	See narrative.

Historic Archaeology Component Form

Resource Number: 5GN6496

Temporary Resource Number: 10701-KC01

Outhouse	F4	5 feet long and 3 feet wide	See narrative.
Loafing shed	F5	20 feet long and 15 feet wide; See narrative	See narrative.
Fence line with gate	F6	373 feet long and 4-5 feet high	See narrative.
Circular depression/possible privy location	F7	3 feet long, 3 feet wide, and 3-6 inches deep	See narrative.
Corral complex	F8	75 feet long and 45 feet wide	See narrative.

25. Potential for Additional Archaeological Information

Is there potential for additional information? ☒ Yes ☐ No ☐ Unknown If yes or unknown describe below

Potential Within:	Describe
a. Subsurface deposits within a structural feature	Unlikely based on site interpretation; structures are currently still in use.
b. Subsurface deposits outside a structural feature	Unknown, structures are still in use.
c. Trash area	n/a
d. Privy pits	Unknown, however subsurface cultural materials dumped into the privy (F7) have potential to yield information important to interpreting the history of the camp.
e. Other	n/a

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303-866-3395

Resource Number: 5GN6496
Temporary Resource Number: 10701-KC01

OAHP1403
Rev. 9/98

Official eligibility determination
(OAHP use only)

Colorado Cultural Resource Survey

Architectural Inventory Form

Associated with an Historic Component Form

Date _____ Initials _____
____ Determined Eligible-NR
____ Determined Not Eligible-NR
____ Determined Eligible-SR
____ Determined Not Eligible-SR
____ Need Data
____ Contributes to eligible NR District
____ Noncontributing to eligible NR District

I. IDENTIFICATION

- | | | | |
|-------------------------------|------------------------------------|----------------|------------|
| 1. Resource number: | 5GN6496 | 3. Locus: | Site |
| 2. Temporary resource number: | 10701-KC01 | 4. Feature No: | 10701-KC01 |
| 5. Historic building name: | Hammond Cow Camp/Dry Fork Cow Camp | | |
| 6. Current building name: | Dry Fork Cow Camp | | |

III. ARCHITECTURAL DESCRIPTION

- | | | |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| 7. Building plan (footprint, shape): | Rectangular | |
| 8. Dimensions in feet: Length | 34.75 | x Width 15.75 |
| 9. Number of stories: | 1 | |
| 10. Primary external wall material(s): | Wood | : Board and batten |
| | | : |
| 11. Roof configuration: | Gabled | : |
| 12. Primary external roof material: | Metal | : |
| 13. Special features: | none | |
| 14. General architectural description: | <p>Feature 1 (F1) is a one-story wood-frame cabin (Figure 3). The rectangular foundation is constructed of concrete and native stone and measures 34.75 by 15.75 feet. Exterior walls are clad with vertical lumber board siding (batten board). The entrance is off center on the south elevation and covered with a paneled metal door with multiple lights in the top half. The door is elevated slightly over a small concrete pad porch that is flush to the ground. The front-gabled roof extends almost 4 feet over the porch, and the roof extension features decorative saw tooth-shaped trim. On the east side of the porch a concrete block chimney is exposed along the exterior of the south elevation and through the slope of the roof extension. The roof is covered with lapped seam steel sheets and features exposed rafter tails. On the rear (north) elevation of the building is a shed addition measuring 8 feet by 16 feet wide; it has a separate entrance covered with a vertical board door on its west side. Window fenestrations include a wood-framed sliding window centered on the south elevation, two aluminum-framed sliding windows on the east elevation, and one aluminum-framed sliding window on the west elevation. The cabin has been continually maintained and is currently in use, and it is, therefore, in good condition. Visible exterior alterations include recent replacement of the front door, most windows, and the roof with modern metal materials.</p> | |

Resource Number: 5GN6496
Temporary Resource Number: 10701-KC01

15. Architectural style/building type:

Late 19th and Early 20th Century American Movements: Rustic: Cabin

16. Landscaping or special setting features:

17. Associated buildings, features, or objects:

F2 is a water catchment feature on small drainage east of F1, consisting of a singular pvc pipe dumping into two troughs; F3 is a fire ring made of local stone; F4 is a one-holed, wood-framed outhouse with a metal roof; F5 is a loafing shed with an enclosed storage area and a small corral; F6 is a fence line oriented east-to-west north of the features and includes a gate; F7 is a circular depression and possible previous privy location; and F8 is a corral complex with an inner division in the southwest corner.

IV. ARCHITECTURAL HISTORY

18. Date of construction: Estimate: Actual: 1935-1940

Source of information: USGS 1938; USDA, Forest Service 2007

19. Architect: Unknown

Source of information:

20. Builder/contractor: Unknown

Source of information:

21. Original owner: Unknown

Source of information:

22. Construction history (include description and dates of major additions, alterations, or demolitions):

5GN6496 appears on a 1938 Mount Gunnison 1:62,500 topographic map as the Hammond Cow Camp (USGS 1938). Forest Service records indicate the spring (F2) was constructed in 1935 and the cabin (F1) was constructed in 1940 (USDA Forest Service 2007). Metal slide windows and a metal door are visible on F1, and metal gates are visible on F5 and the associated corral, with plywood used on the interior of the loafing shed structure.

23. Original location X Moved Date of move:

V. HISTORICAL ASSOCIATIONS

24. Original use(s): Domestic Single Dwelling

25. Intermediate use(s):

26. Current use(s): Domestic Single Dwelling

27. Site type(s): Historical Backcountry Camp

28. Historical background:

5GN6496 appears on a 1938 Mount Gunnison 1:62,500 topographic map as the Hammond Cow Camp (USGS 1938). Forest service records indicate the spring (F2) was constructed in 1935 and the cabin (F1) was constructed in 1940 (USDA, Forest Service 2007). The structure has remained in the same location, according to historical aerials, and still serves as a water source for cattle that graze on Forest Service land. The new door and windows on the cabin and modern gates F5 and F8 show that the site has been maintained, but the overall design and materials of the site have not been greatly modified. The camp is still used for the same purposes as when originally built. Building materials and weathering indicate that the cabin and associated features F4 (potentially) and F5 were constructed during the same period; therefore, features F1, F4, and F5 contribute to the eligibility of the resource.

29. Source of information:

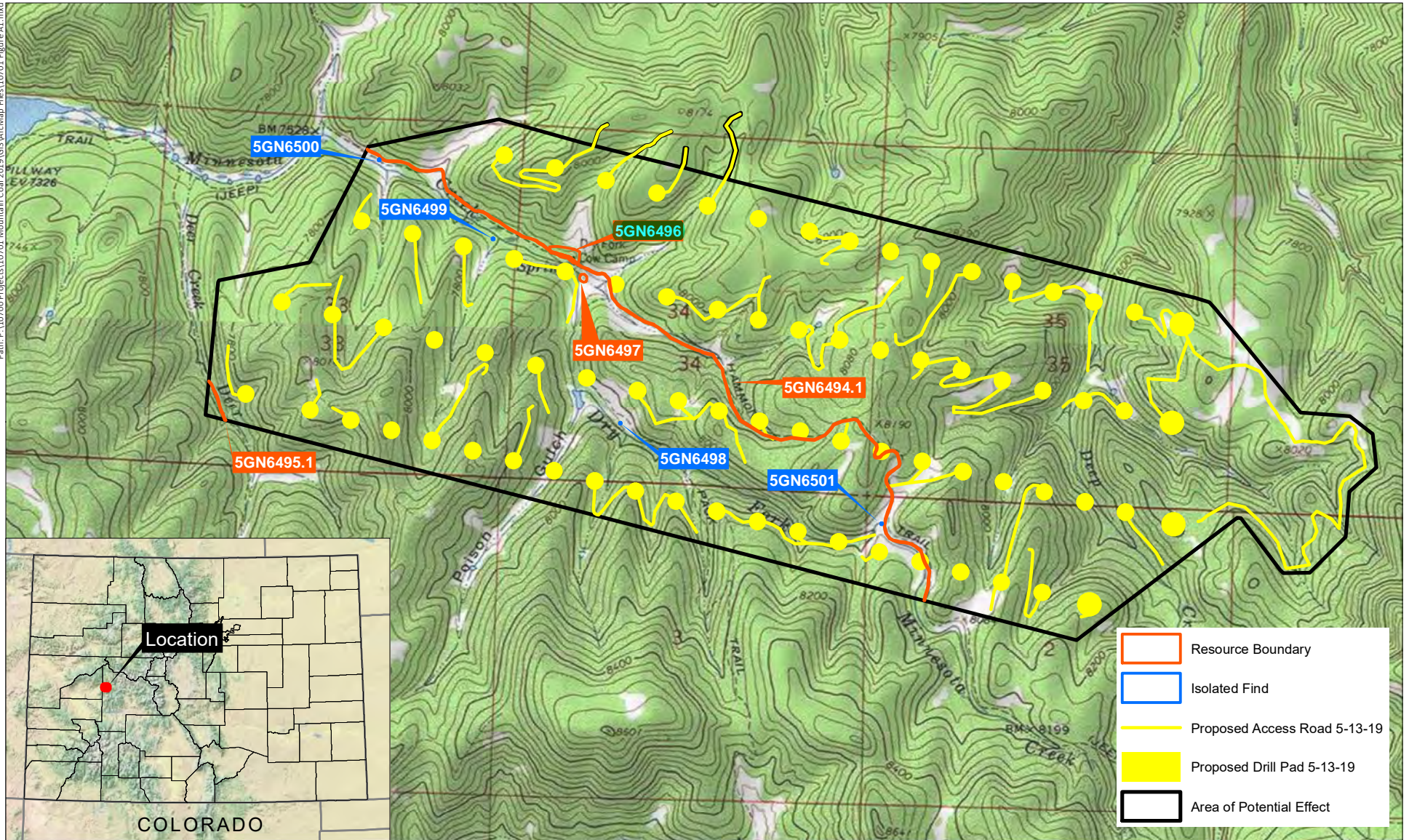
U.S. Department of Agriculture, Forest Service
2007 "Dry Fork Improvements." Internal Forest Service Documentation.

Resource Number: 5GN6496
Temporary Resource Number: 10701-KC01

United States Geological Survey (USGS)
1938 Mt. Gunnison, Colorado Map. 1:62,500 (Topographic). U.S. Department of the Interior Geological Survey.

NOTE: Please include a sketch map, a photocopy of the USGS quad map indicating resource location, and photographs.

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Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM
 Sections 1-4, T14S, R90W; 6th PM
 USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
 Gunnison County, Colorado

Figure A1
Resource Locations

Prepared for: Mountain Coal Company, LLC
 File: 10701 Figure A1.mxd (MH)
 July 2, 2019

ERO
 ERO Resources Corp.



**5GN6496 – Site overview, Hammond (Dry Fork) Cow Camp (F1, F2, and F3 visible), view to the east.
Photo Number: K.1040007 Date: 6.10.19**



**5GN6496 – Site overview, Hammond (Dry Fork) Cow Camp (F1, F3, F4, and F5 visible), view to the northwest.
Photo Number: K.1040008 Date: 6.10.19**



**5GN6496 – F1 overview, main cabin south elevation, view to the north.
Photo Number: K.1030979 Date: 6.10.19**



**5GN6496 – F1 detail, south and west elevation of the main cabin, view to the northeast.
Photo Number: K.1030980 Date: 6.10.19**



**5GN6496 – F1 detail, north and west elevation of the main cabin, view to the southeast.
Photo Number: K.1030981 Date: 6.10.19**



**5GN6496 – F1 detail, north and east elevation of the main cabin, view to the south/southwest.
Photo Number: K.1030982 Date: 6.10.19**



**5GN6496 – F1 detail, south and east elevation of the main cabin, view to the northwest.
Photo Number: K.1030983 Date: 6.10.19**



**5GN6496 – F2 overview, water catchment feature, view to the east.
Photo Number: K.1030984 Date: 6.10.19**



**5GN6496 – F3 overview, fire ring constructed of local stone, view to the north.
Photo Number: K.1030985 Date: 6.10.19**



**5GN6496 – F4 overview, outhouse exterior, view to the northwest.
Photo Number: K.1030986 Date: 6.10.19**



5GN6496 – F4 detail, outhouse interior, plan view.
Photo Number: K.1030987 Date: 6.10.19



5GN6496 – F5 overview, loading shed and small corral, view to the northwest.
Photo Number: K.1030989 Date: 6.10.19



**5GN6496 – F5 overview, shed and small corral with plywood interior visible, view to the northwest.
Photo Number: K.1030991 Date: 6.10.19**



**5GN6496 – F6 overview, fence line with gate, view to the north.
Photo Number: K.1030988 Date: 6.10.19**



5GN6496 – F7 overview, circular depression and possible privy location, view to the west.
Photo Number: K.1030994 Date: 6.10.19



5GN6496 – F8 overview, corral complex, view to the east.
Photo Number: K.1030999 Date: 6.10.19

Management Data Form

A Management Data Form should be completed for each cultural resource recorded during an archaeological survey. Isolated finds and revisits are the exception and they do not require a Management Data Form. Please attach the appropriate component forms and use continuation pages if necessary. Fields can be expanded or compressed as necessary.

1. Resource Number: 5GN6497**2. Temporary Resource Number:** 10701-KC03**3. Attachments (check as many as apply)**

- ☐ Prehistoric Archaeological Component
☒ Historic Archaeological Component
☐ Linear Component
☒ Sketch/Instrument Map (required)
☒ U.S.G.S. Map Photocopy (required)
☒ Photograph(s) (required)
☐ Other, Specify:

4. Official Determination (OAHP use only)

- ☐ Determined Eligible NR/SR _____
☐ Determined Not Eligible NR/SR _____
☐ Nominated _____
☐ Need Data NR/SR _____
☐ Contributing to NR Dist./SR Dist _____
☐ Not Contributing to NR Dist./SR Dist _____
☐ Supports overall linear eligibility NR/SR _____
☐ Does not supports overall linear eligibility NR/SR _____

I. IDENTIFICATION**5. Resource Name:****6. Project Name/Number:** Mountain Coal Future B Seam (Project 10701)**7. Government Involvement:** ☐ Local ☐ State ☒ Federal

Agency: Grand Mesa, Uncompahgre, and Gunnison National Forests

8. Site Categories (check as many as apply):

Prehistoric: ☐ archaeological site ☐ paleontological site ☐ In existing National Register district
 National Register district name:

Historic: ☒ archaeology site ☐ building(s) ☐ structure(s) ☐ object(s) ☐ In existing National Register district
 National Register District name

9. Owner(s) Name and Address Grand Mesa, Uncompahgre, and Gunnison National Forests**10. Boundary Description and Justification:** Extent of cultural manifestations within the APE

11. Site/Property Dimensions: Length: 34.75m Width: 33m Area: 909m² Ac: 0.225
 Area was calculated as: ☐ Length x Width (rectangle/square) ☐ Length x Width x 0.785 (ellipse) ☒ GIS

II. LOCATION**12. Legal Location**

PM: 6th Township: 13S Range: 90W Section: 34 SW 1/4 of NW 1/4

If section is irregular, explain alignment method:

13. USGS Quad(s) Somerset, CO**14. County(ies):** Gunnison**15. UTM Coordinates:** Datum used ☐ NAD 27 ☒ NAD 83 ☐ WGS 84 ☐ Other:

A. Zone 13N 288,300 mE 4,305,961 mN

16. UTM Source: ☒ Corrected GPS/rectified survey (<5m error) ☐ Uncorrected GPS ☐ Map template
 Other (explain):

17. Site elevation (feet): 7,680**18. Address** Lot: Block: Addition:

Management Data Form

Resource Number: 5GN6497

Temporary Resource Number: 10701-KC03

19. Location/Access From Paonia CO, drive east along Minnesota Creek Road until the intersection of Forest Service Roads 710A and 711. Take a left to FSR 711 and continue for approximately 2.6 miles, passing the Minnesota Reservoir to your north until the road intersects with CR 50. Take CR 50 and drive southeast for 0.9 miles. The site is 150 feet south of the road.

III. NATURAL ENVIRONMENT/SITE CONDITION

20. General Description should include both on-site as well as geographical setting with aspect, landforms, vegetation, soils, depositional environment, water, ground visibility):

5GN6497 consists of a sparse scatter of possible structural debris located on a terrace at the confluence of the Dry Fork of Minnesota Creek and an unnamed drainage. Surrounding vegetation includes low-lying forbes and grasses, with willow located adjacent to the drainage. Ground visibility is 70 to 90 percent.

21. Soil depth (cm) and description:

Soils are a very deep and well drained loam formed in slope alluvium (NRCS 2019).

22. Condition

a. Architectural/Structural

- ☐ Excellent
- ☐ Good
- ☐ Fair
- ☐ Deteriorated
- ☒ Ruin

b. Archaeological/Paleontological

- ☐ Undisturbed
- ☐ Light disturbance
- ☐ Moderate disturbance
- ☐ Heavy disturbance
- ☐ Total disturbance

23. Describe condition:

Little evidence of the historic cabin remains.

24. Vandalism: ☐ Yes ☒ No

Describe:

IV. NATIONAL/STATE REGISTER ELIGIBILITY ASSESSMENT

25. Context or Theme(s): Historic Settlements (Clark and Corbett 2007)

26. Applicable National Register Criteria:

- ☐ A. Associated with events that have made a significant contribution to the broad pattern of our history
- ☐ B. Associated with the lives of persons significant in our past
- ☐ C. Embodies 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
- ☐ D. Has yielded, or may be likely to yield, information important in history or prehistory
- ☒ Does not meet any of the National Register criteria
- ☐ Qualifies under exceptions A through G. List exception(s):

27. Applicable State Register Criteria:

- ☐ A. Property is associated with events that have made a significant contribution to history
- ☐ B. Property is connected with persons significant in history
- ☐ C. Property has distinctive characteristics of a type, period, method of construction or artisan
- ☐ D. Property is of geographic importance
- ☐ E. Property contains the possibility of important discoveries related to prehistory or history
- ☒ Does not meet any of the State Register criteria

28. Areas of significance:

None

Management Data Form

Resource Number: 5GN6497

Temporary Resource Number: 10701-KC03

29. Periods of significance:

Late-1800s

30. Level of significance:

☐ National

☐ State

☐ Local

31. Statement of significance:

ERO recommends site 5GN6497 not eligible for listing in the NRHP due to loss of integrity. The site is potentially eligible under Criterion A due to its association with early settlement in the North Fork valley. The cabin is not known to be associated with any historically significant individuals and is not eligible for listing in the NRHP under Criterion B. There are no remaining structures on the site, and the sparse scatter of structural debris does not embody any unique aspects of design or craftsmanship (Criterion C). The fluctuation of the water table and the presence of wetland within the site has heavily impacted the likelihood for intact archaeological deposits to be present (Criterion D).

32. Statement of historic integrity related to significance (reference Location, Design, Setting, Materials, Workmanship, Feeling, and Association):

The only intact aspect of integrity is location. Burning and removal of the cabin structure have affected the integrity aspects of materials, workmanship, design, feeling, and association. The historical setting has been compromised by development associated with coal mining as well as alteration of the original trail that led to the cabin (the trail is now a heavily travelled road).

33. National Register Eligibility Field Assessment:

Linear Segment Evaluation (if applicable):

☐ Eligible

☒ Not eligible

☐ Need data

☐ Supporting

☐ Non-supporting

34. Status in an existing National Register District:

☐ Contributing

☐ Non-contributing

35. State Register Eligibility Field Assessment:

☐ Eligible

☒ Not eligible

☐ Need data

36. Status in an existing State Register District:

☐ Contributing

☐ Non-contributing

37. National/State Register District Potential: ☐ Yes ☒ No Describe:

Insufficient density of sites, structures, buildings, or objects exists within the area to constitute a historic district.

38. Cultural Landscape Potential: ☐ Yes ☒ No Describe:

No cultural landscape potential.

39. If Yes to either 37 or 38, is this site: ☐ Contributing ☐ Non-contributing Explain:

V. MANAGEMENT AND ADMINISTRATIVE DATA

40. Threats to Resource ☐ Water erosion ☐ Wind erosion ☐ Grazing ☐ Neglect ☐ Vandalism
☐ Recreation ☐ Construction ☐ Other (explain): none

41. Existing protection: ☒ None ☐ Marked ☐ Fenced ☐ Patrolled ☐ Access controlled
☐ Other (specify):

Comments:

42. Local landmark designation:

43. Easement:

44. Recorder's Management Recommendations: No further work

No further work upon concurrence with the not-eligible recommendation. Regardless, based on current design for the placement of MVB pads and roads, this resource would not be affected by proposed project activities.

VI. DOCUMENTATION

Management Data Form

Resource Number: 5GN6497

Temporary Resource Number: 10701-KC03

45. Previous actions accomplished at the site: ☐ Tested ☐ Partial excavation ☐ Complete excavation

Date(s):

a. Excavations:

b. Stabilization:

c. HABS/HAER documentation [date(s) and numbers]:

d. Other:

46. Known collections/reports/interviews and other references (list):

General Land Office (GLO)

1885 Township No. 13 South Range No. 90 West of the 6th Principal Meridian, Colorado. Map. 40 chains to an inch. U.S. Surveyor General's Office, Denver.

Natural Resources Conservation Service (NRCS)

2019 Web Soil Survey. Electronic document, <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>, accessed June 28, 2019.

United States Geological Survey (USGS)

1938 Mt. Gunnison, Colorado Map. 1:62,500 (Topographic). U.S. Department of the Interior Geological Survey.

1963 Historical Aerial, Entity ID: AR1VAQR00010034. Electronic Document: <https://earthexplorer.usgs.gov/>. Last Accessed June 26, 2019.

47. Primary location of additional data: ERO Resources Corporation

48. State or Federal Permit number: CAN715HR

49. Collection: Artifact collection authorized: ☐ Yes ☒ No Were artifacts collected? ☐ Yes ☒ No

Artifact repository:

Collection method: ☐ Diagnostics ☐ Grab ☐ Random Sample

Other (specify):

50. Photograph Numbers: K.1040009-013

Files or negatives stored at: ERO Resources Corporation

51. Report Title: Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision #TR-147, Gunnison County, Colorado

52. Recorder(s): Kathy Croll, Matthew Howryla, Justin Batista

Date: 6/10/2019

53. Recorder affiliation: ERO Resources Corporation - Denver/Durango

Phone number/Email: 303.830.1188 / 970.422.2136

Note: Please attach a site map, a photocopy of the USGS 1:24000 map indicating resource location, and photographs.

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303-866-3395

COLORADO CULTURAL RESOURCE SURVEY
Historic Archaeology Component Form

OAHP1402
Rev. 11/10

1. Resource Number: 5GN6497

2. Temporary Resource Number: 10701-KC03

3. Site Name:

4. Does this form pertain to the site in general? ☒ Yes ☐ No

If no, please supply a feature/structure number or name: Site

5. Site, Component, or Feature Type: Foundation

6. Narrative History (based on archival research, expand as necessary):

The only evidence that the site represents a cabin appears on a GLO plat from 1885. A square labelled Cabin is located on the map in the approximate location as 5GN6497. Archival research indicates that the cabin was not present for long. The 1938 Mt. Gunnison topographic map notes the location of the Hammond Cow Camp/Dry Fork Cow Camp (5GN6496) northwest of 5GN6497 but does not indicate the presence of a cabin in the current location of the site (USGS 1938). Additionally, aerial photographs from 1963 show no standing structures in the location of 5GN6497 (USGS 1963).

7. Is this site located in a NRHP historic landscape? ☐ Yes ☒ No If yes, please describe:

8. Component or Feature Description (expand as necessary):

A sparse scatter of structural debris (F1) includes 11 sandstone cobbles and 6 cut log remnants with evidence of burning. A square sheet of galvanized tin with a circular stove pipe hole in the center was located approximately 51 ft northwest of F1. At the time the site was recorded, the area was saturated from flowing water during spring runoff. Additional cultural material may be present but could not be assessed due to saturated ground; however, any cultural material would now be compromised from periodic saturation.

9. Historic Component Date(s): Pre-1885

Justification and Sources Consulted: GLO plat from 1885

10. Component Function(s):

Original Use: Unknown

Present Use: Ruin

11. Ethnic affiliation of occupants: Unknown

Justification and Sources Consulted:

12. Historic Boundary Description: Unknown

Justification and Sources Consulted:

13. NRHP Area of Significance: None

Justification and Sources Consulted:

14. NRHP Period of Significance: None

Justification and Sources Consulted:

15. Site, Component, or Feature Theme (use the Historic Archaeology Lexicon):

Unknown

16. Does this component or feature support the NRHP eligibility of the entire resource?

☐ Yes ☐ No ☐ Undetermined ☒ N/A

Justification:

17. Recorder(s): Kathy Croll, Matthew Howryla, Justin Batista

18. Date: 6/10/2019

Historic Archaeology Component Form

Resource Number: 5GN6497

Temporary Resource Number: 10701-KC03

19. Presence and Quantity of Artifacts

f. Structural Artifacts	Quantity	Quantity
Galvanized tin with a circular stove pipe hole in the center	1	Log: hewn 6
Sandstone cobbles	11	

20. Total assemblage size: 1 Or estimate: ☐ 0-10 ☒ 11-100 ☐ 101-1,000 ☐ 1,001-10,000 ☐ >10,000

21. Artifact Density ☐ High ☐ Medium ☒ Low Describe:

Galvanized tin sheet, hewn log fragments, and sandstone cobbles

22. Unique Artifact Descriptions. Particularly important attributes are listed following the artifact class and standardized terminology can be found in the Appendix to the instructions. Expand or contract tables as necessary. All of these items should be included in the counts of the Artifacts table above.

None

23. Are standing structures present on the site? ☐ Yes ☒ No

If yes, please complete Architectural Inventory Form(s) (1403)

24. Feature Descriptions Include a site map, to scale, with each feature listed below depicted on it. Please use the Historic Archaeology Lexicon for feature types. Insert rows and feature types into table as necessary. If desired, sort table by feature number.

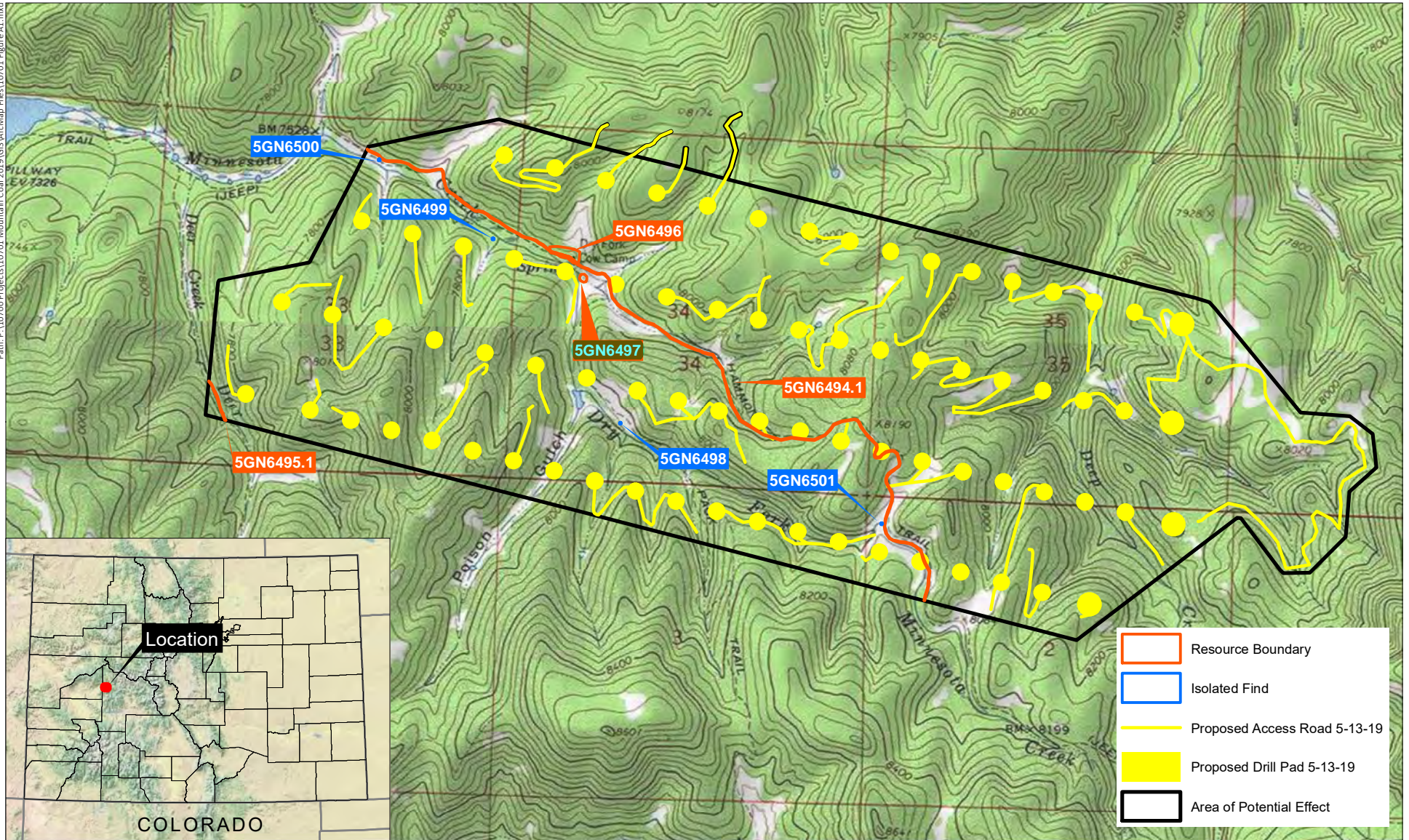
Feature Type (add others as necessary)	Feature Number/Name	Dimensions (feet / inches)	Description
Structural debris	F1	26 feet by 22 feet	See narrative.

25. Potential for Additional Archaeological Information

Is there potential for additional information? ☐ Yes ☒ No ☐ Unknown If yes or unknown describe below

Potential Within:	Describe
a. Subsurface deposits within a structural feature	
b. Subsurface deposits outside a structural feature	
c. Trash area	
d. Privy pits	
e. Other	

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303-866-3395



Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM
 Sections 1-4, T14S, R90W; 6th PM
 USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
 Gunnison County, Colorado

0 1,000 2,000
 Feet
 1:24,000

Figure A1
Resource Locations



Prepared for: Mountain Coal Company, LLC
 File: 10701 Figure A1.mxd (MH)
 July 2, 2019

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5GN6497

[] Site Boundary

[] Nearby Resource

▲ Datum

[] Feature

⊕ Photo Point

● Stove Pipe

—▶ Drainage

— Contour 10 Foot Interval

Minnesota Reservoir Road/CO Road 50 (5GN6494.1)

5GN6494.1

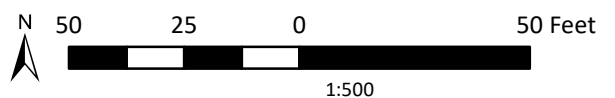
11

F1

43

7670

Dry Fork Minnesota Creek



For Official Use Only: Disclosure of site locations prohibited (43 CFR 7.18)



**5GN6497 – Site overview, historic cabin location, view to the southeast.
Photo Number: K.1040011 Date: 6.10.19**



**5GN6497 – Site overview, historic cabin location with Minnesota Creek Road in background,
view to the north. Photo Number: K.1040013 Date: 6.10.19**



5GN6497 – F1 detail, sparse scatter of structural debris, plan view.
Photo Number: K.1040012 Date: 6.10.19



5GN6497 – Detail, galvanized tin with circular stove pipe hole, plan view.
Photo Number: K.1040009 Date: 6.10.19

Archaeological Isolated Find/Feature Form

This form is not to be used for phenomena that are eligible for the National Register or are part of the built environment. To be used only for phenomena that meet the requirement of the recorder's definition as provided below. A map at 1:24000 scale with IF clearly plotted must be attached.

1. Site Number: 5GN6498 **2. Temporary Resource Number:** 10701-KCIF01 **3. County:** Gunnison

4. Recorder's Definition of Isolated Find:

Isolated finds represent evidence of past human activity that is either not patterned (as in the inadvertent loss or discard of one or more artifacts), too limited to qualify as a site, or represents one or more episodes of conscious discard of material culture manufactured and/or used for its primary purpose elsewhere. Professional judgment is generally used to distinguish between purposeful activity and isolated occurrences of artifacts that are often attributable to "background noise".

5. PM 6th **Township:** 13S **Range:** 90W **Section:** 34 SE **1/4 of** SW **1/4**

If section is irregular, explain alignment method:

6. USGS Quad: Minnesota Pass, CO **7. Elevation:** 7,783 ft.

8. UTM Coordinates: Datum used ☐ NAD 27 ☒ NAD 83 ☐ WGS 84 ☐ Other:
Zone: 13N 288,457 mE 4,305,333 mN

9. UTM Source: ☒ Corrected GPS/rectified survey (<5m error) ☐ Uncorrected GPS ☐ Map template
☐ Other (explain):

10. Landowner: Grand Mesa, Uncompahgre, and Gunnison National Forests
2777 Crossroads Boulevard, Unit 1
Grand Junction, Colorado 81506

11. Describe Artifact(s) and their distribution:

A large, collapsed, galvanized steel and riveted boiler tank.

12. Describe Features (including dimensions):

☒ No features

13. Cultural Affiliation and Justification:

Historic American

14. Time Period and Justification:

Unknown historic

15. Relevant environmental information (e.g. elevation, topography, soils, vegetation, nearby water source):

This isolate is situated between two roads, just above the Dry Fork of Minnesota Creek, and east of Poison Gulch. The surrounding vegetation includes low lying forbes and grasses, with various riparian species visible in the drainage. Ground visibility is 60 percent.

16. Is this isolate located in a cultural landscape? ☐ Yes ☒ No

If yes, describe:

17. Why is this isolated find not eligible for the National Register?

The isolate represents limited use and will not provide additional information important to the history of the area.

18. Additional Information (e.g., narrative, drawings, photographs, sketch map; attach extra pages if desired):

19. Artifacts Collected? ☐ Yes ☒ No

If yes, provide repository information:

20. Report Title and Project Number:

Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision
#TR-147, Gunnison County, Colorado - Project 10701

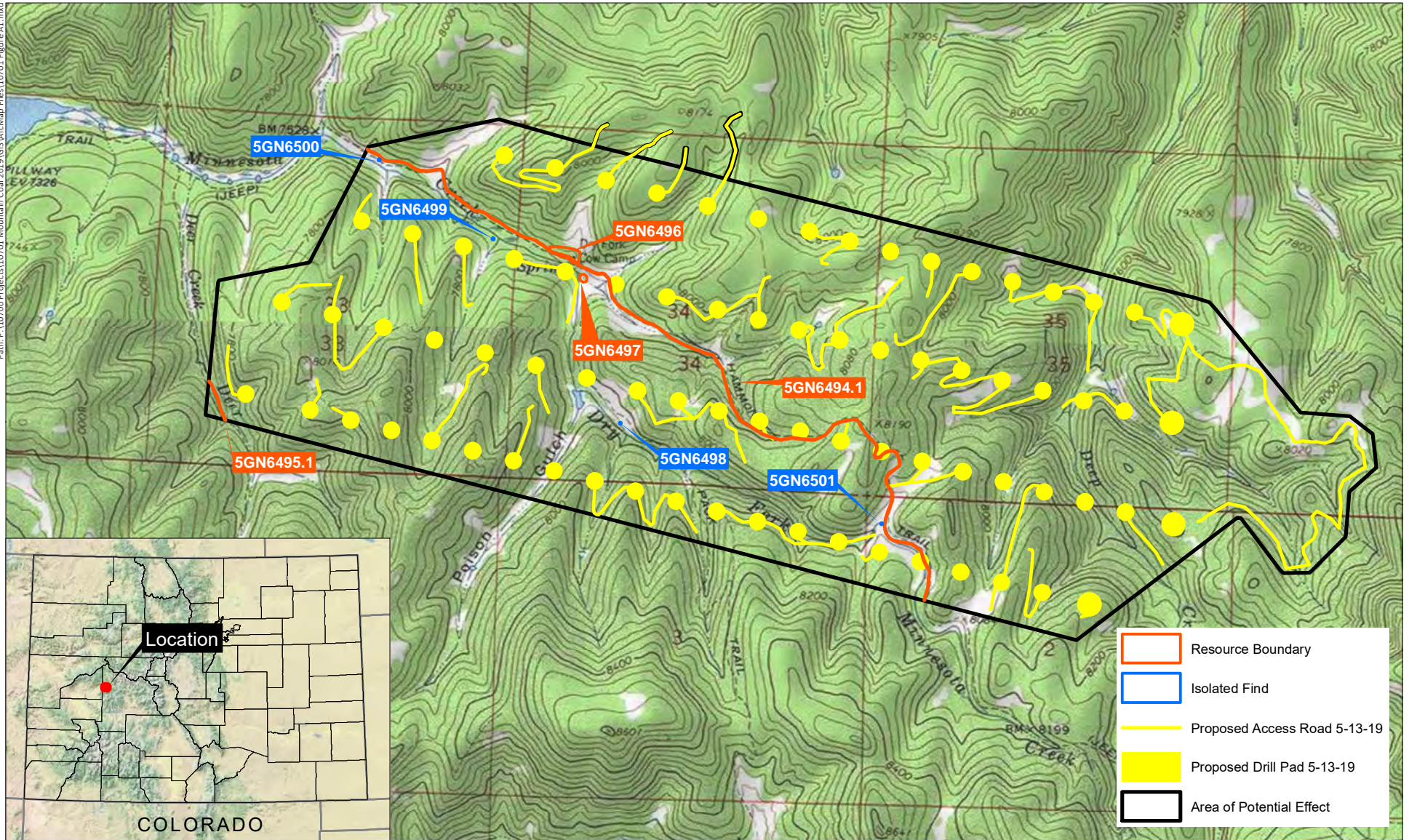
21. Recorder and Affiliation: Kathy Croll, Matt Howryla, Justin Batista (ERO Resources Corporation -
Date: 6/11/2019 Denver/Durango)

Archaeological Isolated Find/Feature Form

Resource Number: 5GN6498

Temporary Resource Number: 10701-KCIF01

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Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM
Sections 1-4, T14S, R90W; 6th PM
USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
Gunnison County, Colorado

0 1,000 2,000
Feet
1:24,000

Figure A1
Resource Locations

Prepared for: Mountain Coal Company, LLC
File: 10701 Figure A1.mxd (MH)
July 2, 2019

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**5GN6498 – Overview of riveted tank, view to the southwest.
Photo Number: K.1040034 Date: 6.12.19**

Archaeological Isolated Find/Feature Form

This form is not to be used for phenomena that are eligible for the National Register or are part of the built environment. To be used only for phenomena that meet the requirement of the recorder's definition as provided below. A map at 1:24000 scale with IF clearly plotted must be attached.

1. Site Number: 5GN6499 **2. Temporary Resource Number:** 10701-KCIF02 **3. County:** Gunnison

4. Recorder's Definition of Isolated Find:

Isolated finds represent evidence of past human activity that is either not patterned (as in the inadvertent loss or discard of one or more artifacts), too limited to qualify as a site, or represents one or more episodes of conscious discard of material culture manufactured and/or used for its primary purpose elsewhere. Professional judgment is generally used to distinguish between purposeful activity and isolated occurrences of artifacts that are often attributable to "background noise".

5. PM 6th **Township:** 13S **Range:** 90W **Section:** 33 SE **1/4 of** NE **1/4**

If section is irregular, explain alignment method:

6. USGS Quad: Somerset, CO **7. Elevation:** 7,644 ft.

8. UTM Coordinates: Datum used ☐ NAD 27 ☒ NAD 83 ☐ WGS 84 ☐ Other:
Zone: 13N 287,901 mE 4,306,137 mN

9. UTM Source: ☒ Corrected GPS/rectified survey (<5m error) ☐ Uncorrected GPS ☐ Map template
☐ Other (explain):

10. Landowner: Grand Mesa, Uncompahgre, and Gunnison National Forests
2777 Crossroads Boulevard, Unit 1
Grand Junction, Colorado 81506

11. Describe Artifact(s) and their distribution:

The isolate consists of one white orthoquartzite secondary flake fragment.

12. Describe Features (including dimensions):

☒ No features

13. Cultural Affiliation and Justification:

Unknown prehistoric

14. Time Period and Justification:

Unknown prehistoric

15. Relevant environmental information (e.g. elevation, topography, soils, vegetation, nearby water source):

The isolate sits on the edge of a small tributary of Minnesota Creek. Visibility is 60 percent. Vegetation consists of small aspens, wild dill, small bushes, shrubs, and various grasses.

16. Is this isolate located in a cultural landscape? ☐ Yes ☒ No

If yes, describe:

17. Why is this isolated find not eligible for the National Register?

The isolate represents limited use and will not provide additional information important to the prehistory of the area.

18. Additional Information (e.g., narrative, drawings, photographs, sketch map; attach extra pages if desired):

19. Artifacts Collected? ☐ Yes ☒ No

If yes, provide repository information:

20. Report Title and Project Number:

Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision
#TR-147, Gunnison County, Colorado - Project 10701

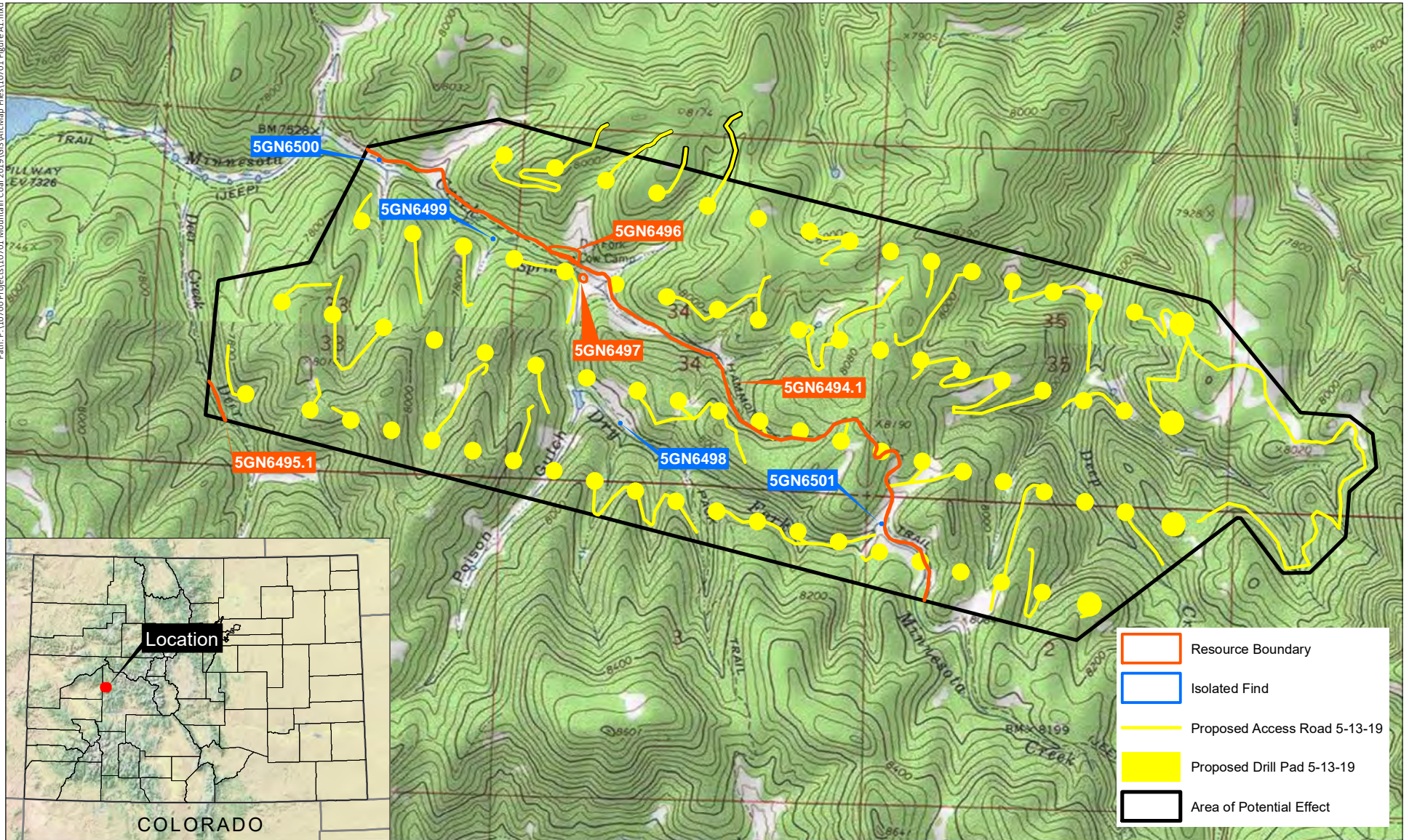
21. Recorder and Affiliation: Kathy Croll, Matt Howryla, Justin Batista (ERO Resources Corporation -
Date: 6/13/2019 Denver/Durango)

Archaeological Isolated Find/Feature Form

Resource Number: 5GN6499

Temporary Resource Number: 10701-KCIF02

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Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM
 Sections 1-4, T14S, R90W; 6th PM
 USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
 Gunnison County, Colorado

0 1,000 2,000
 Feet
 1:24,000

Figure A1
Resource Locations

Prepared for: Mountain Coal Company, LLC
 File: 10701 Figure A1.mxd (MH)
 July 2, 2019

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1. Site Number: 5GN6500 **2. Temporary Resource Number:** 10701-KCIF03 **3. County:** Gunnison

4. Recorder's Definition of Isolated Find:

Isolated finds represent evidence of past human activity that is either not patterned (as in the inadvertent loss or discard of one or more artifacts), too limited to qualify as a site, or represents one or more episodes of conscious discard of material culture manufactured and/or used for its primary purpose elsewhere. Professional judgment is generally used to distinguish between purposeful activity and isolated occurrences of artifacts that are often attributable to "background noise".

5. PM 6th **Township:** 13S **Range:** 90W **Section:** 33 NW **1/4 of** NE **1/4**

If section is irregular, explain alignment method:

6. USGS Quad: Somerset, CO **7. Elevation:** 7,581 ft.

8. UTM Coordinates: Datum used ☐ NAD 27 ☒ NAD 83 ☐ WGS 84 ☐ Other:
Zone: 13N 287,435 mE 4,306,492 mN

9. UTM Source: ☒ Corrected GPS/rectified survey (<5m error) ☐ Uncorrected GPS ☐ Map template
☐ Other (explain):

10. Landowner: Grand Mesa, Uncompahgre, and Gunnison National Forests
2777 Crossroads Boulevard, Unit 1
Grand Junction, Colorado 81506

11. Describe Artifact(s) and their distribution:

☒ No artifacts

12. Describe Features (including dimensions):

This historic feature is a galvanized steel Parshall flume on the Dry Fork of Minnesota Creek.

13. Cultural Affiliation and Justification:

Historic American

14. Time Period and Justification:

Unknown historic

15. Relevant environmental information (e.g. elevation, topography, soils, vegetation, nearby water source):

This isolate is a water measurement and management device situated in the Dry Fork of Minnesota Creek, just east of CR50. The surrounding vegetation includes low-lying forbes, various grasses, and willow visible in the drainage. Ground visibility is 80 percent.

16. Is this isolate located in a cultural landscape? ☐ Yes ☒ No

If yes, describe:

17. Why is this isolated find not eligible for the National Register?

The isolate represents limited use and will not provide additional information important to the history of the area.

18. Additional Information (e.g., narrative, drawings, photographs, sketch map; attach extra pages if desired):

Photo Number: K.1040043

19. Artifacts Collected? ☐ Yes ☒ No

If yes, provide repository information:

20. Report Title and Project Number:

Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision
#TR-147, Gunnison County, Colorado - Project 10701

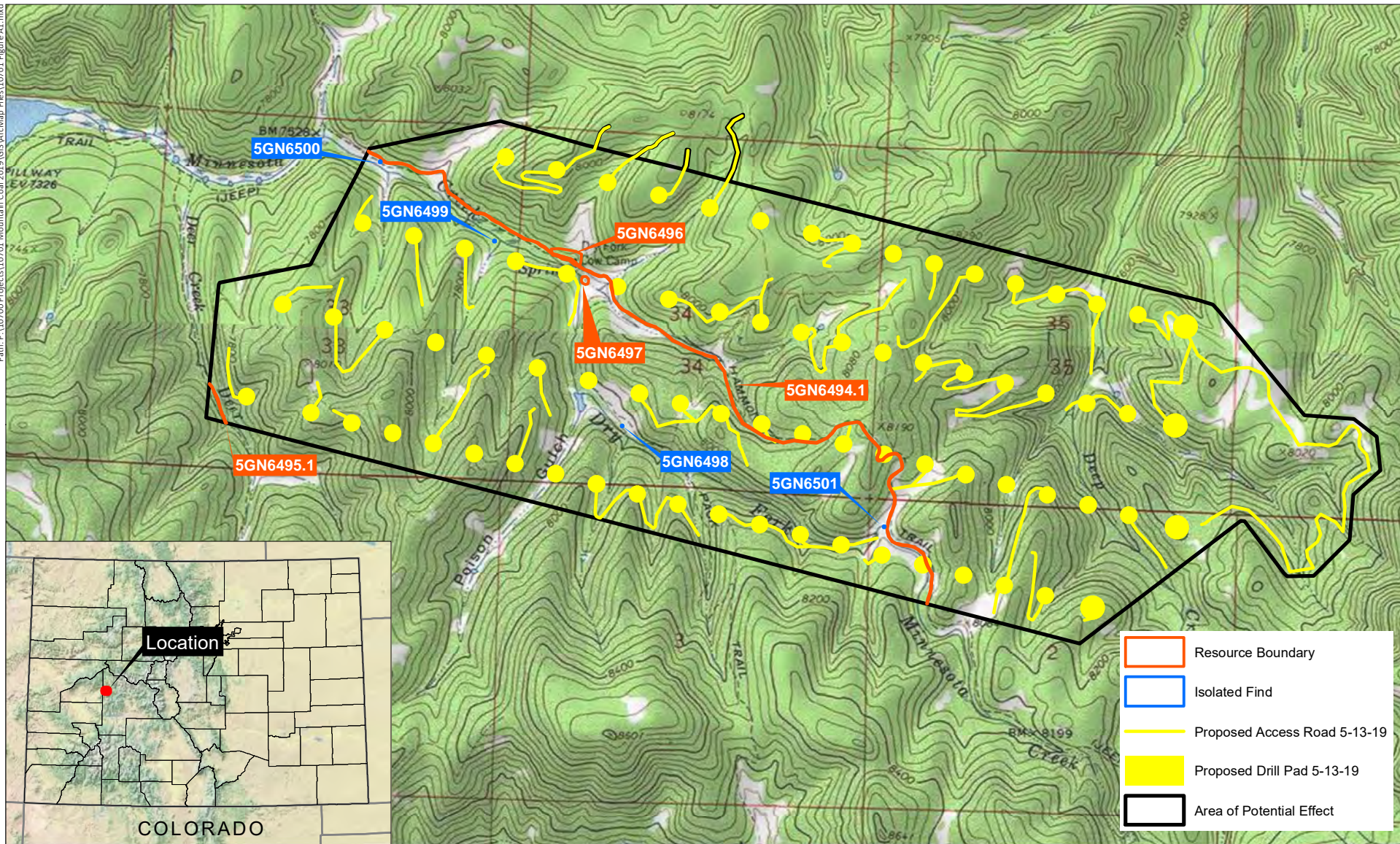
21. Recorder and Affiliation: Kathy Croll, Matt Howryla, Justin Batista (ERO Resources Corporation -
Date: 6/13/2019 Denver/Durango)

Archaeological Isolated Find/Feature Form

Resource Number: 5GN6500

Temporary Resource Number: 10701-KCIF03

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Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM
 Sections 1-4, T14S, R90W; 6th PM
 USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
 Gunnison County, Colorado

0 1,000 2,000
 Feet
 1:24,000

Figure A1
Resource Locations

Prepared for: Mountain Coal Company, LLC
 File: 10701 Figure A1.mxd (MH)
 July 2, 2019

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**5GN6500 – Parshall flume installed in Minnesota Creek, view to the south.
Photo Number: K.1040043 Date: 6.13.19**

Archaeological Isolated Find/Feature Form

This form is not to be used for phenomena that are eligible for the National Register or are part of the built environment. To be used only for phenomena that meet the requirement of the recorder's definition as provided below. A map at 1:24000 scale with IF clearly plotted must be attached.

1. Site Number: 5GN6501 **2. Temporary Resource Number:** 10701-KCIF04 **3. County:** Gunnison

4. Recorder's Definition of Isolated Find:

Isolated finds represent evidence of past human activity that is either not patterned (as in the inadvertent loss or discard of one or more artifacts), too limited to qualify as a site, or represents one or more episodes of conscious discard of material culture manufactured and/or used for its primary purpose elsewhere. Professional judgment is generally used to distinguish between purposeful activity and isolated occurrences of artifacts that are often attributable to "background noise".

5. PM 6th **Township:** 14S **Range:** 90W **Section:** 2 NW **1/4 of** NW **1/4**

If section is irregular, explain alignment method:

6. USGS Quad: Minnesota Pass, CO

7. Elevation: 8,027 ft.

8. UTM Coordinates: Datum used ☐ NAD 27 ☒ NAD 83 ☐ WGS 84 ☐ Other:
Zone: 13N 289,598 mE 4,304,895 mN

9. UTM Source: ☒ Corrected GPS/rectified survey (<5m error) ☐ Uncorrected GPS ☐ Map template
☐ Other (explain):

10. Landowner: Grand Mesa, Uncompahgre, and Gunnison National Forests
2777 Crossroads Boulevard, Unit 1
Grand Junction, Colorado 81506

11. Describe Artifact(s) and their distribution:

☒ No artifacts

12. Describe Features (including dimensions):

This historic feature is a galvanized steel Parshall flume on the Dry Fork of Minnesota Creek.

13. Cultural Affiliation and Justification:

Historic American

14. Time Period and Justification:

Unknown historic

15. Relevant environmental information (e.g. elevation, topography, soils, vegetation, nearby water source):

This isolate is a water measurement and management device situated in the Dry Fork of Minnesota Creek, just east of CR50. The surrounding vegetation includes low-lying forbes, various grasses, and willow visible in the drainage. Ground visibility is 80 percent.

16. Is this isolate located in a cultural landscape? ☐ Yes ☒ No

If yes, describe:

17. Why is this isolated find not eligible for the National Register?

The isolate represents limited use and will not provide additional information important to the history of the area.

18. Additional Information (e.g., narrative, drawings, photographs, sketch map; attach extra pages if desired):

Photo Number: K.1040044

19. Artifacts Collected? ☐ Yes ☒ No

If yes, provide repository information:

20. Report Title and Project Number:

Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads & Roads, Technical Revision
#TR-147, Gunnison County, Colorado - Project 10701

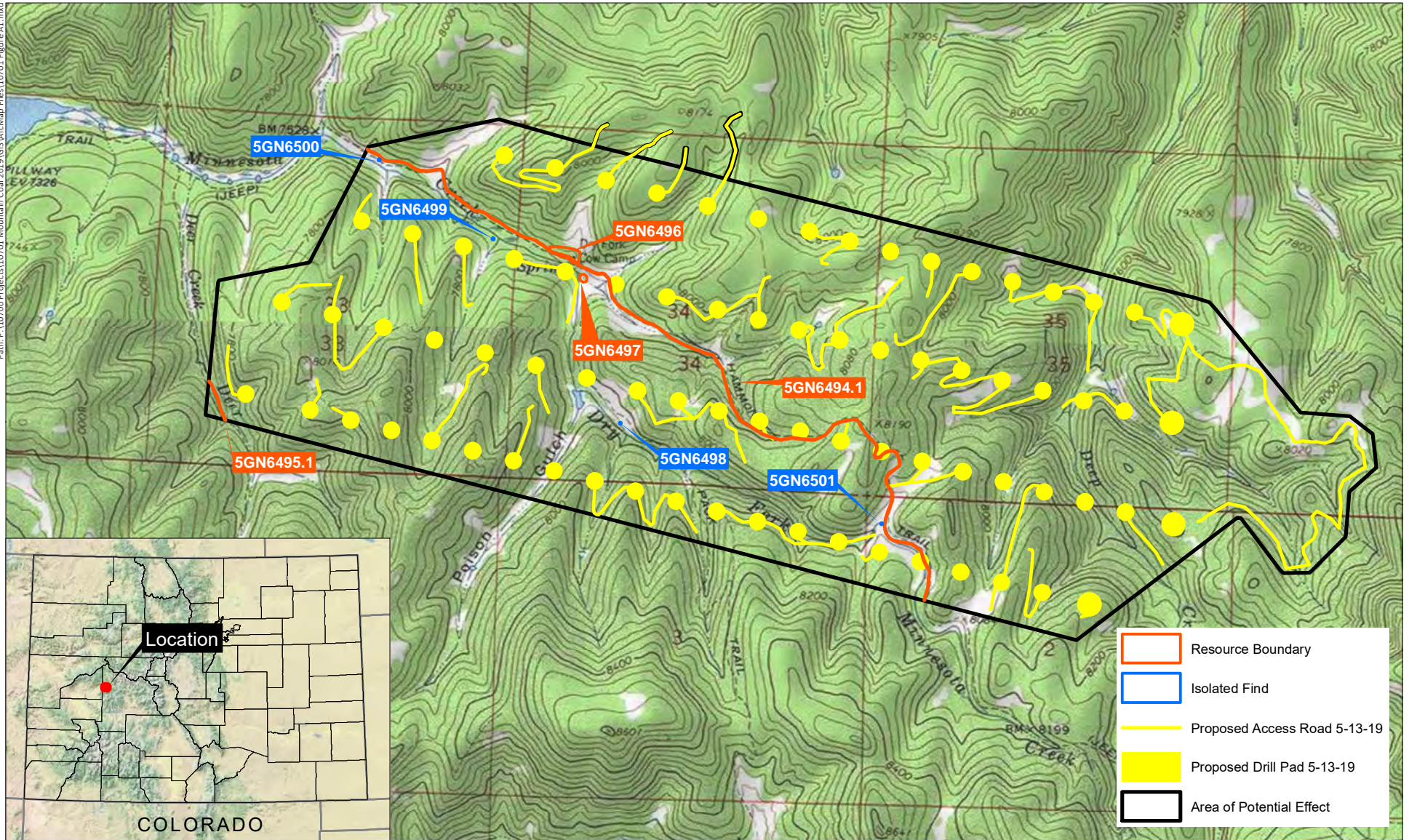
21. Recorder and Affiliation: Kathy Croll, Matt Howryla, Justin Batista (ERO Resources Corporation -
Date: 6/13/2019 Denver/Durango)

Archaeological Isolated Find/Feature Form

Resource Number: 5GN6501

Temporary Resource Number: 10701-KCIF04

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Cultural Resource Survey
Mountain Coal's Future B seam Short-term MVBs Pads & Roads,
Technical revision #TR-147
Gunnison County, Colorado

Sections 27, and 33-36, T13S, R90W; 6th PM
 Sections 1-4, T14S, R90W; 6th PM
 USGS Somerset and Minnesota Pass, CO Quadrangles (1:24,000, 1979)
 Gunnison County, Colorado

0 1,000 2,000
 Feet
 1:24,000

Figure A1
Resource Locations



Prepared for: Mountain Coal Company, LLC
 File: 10701 Figure A1.mxd (MH)
 July 2, 2019

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**5GN6501 – Overview of Parshall flume installed near bridge, view to the southeast.
Photo Number: K.1040044 Date: 6.13.19**



Chad Stewart
Forest Supervisor
Grand Mesa, Uncompahgre, and Gunnison National Forests
2250 South Main Street
Delta, Colorado 81416

Re: Class II Cultural Resource Survey Mountain Coal's Future B Seam Short-Term MVBs Pads
& Roads, Technical Revision #TR-147 Gunnison County, Colorado (R2019020408005) (HC#76244)

Dear Mr Stewart:

As requested by your November 1, 2021 letter, please find revised correspondence on the subject matter that mirrors our July 23, 2019 reply in content:

After review of the documentation provided, we concur with the following eligibility determinations:

- That site 5GN.6496 is eligible for listing to the National Register of Historic Places (NRHP).
- That sites 5GN.6495.1 and 5GN.6497 are not eligible for listing to the NRHP.
- That site segment 5GN.6494.1 does not support overall eligibility of the linear resource for listing to the NRHP.
- That isolates 5GN.6498, 5GN.6499, 5GN.6500, and 5GN.6501 are not eligible for listing to the NRHP.

We also concur that the recommended effect finding of no adverse effect [36 CFR 800.5(d)(1)] is appropriate for the proposed undertaking.

Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register eligibility criteria (36 CFR 60.4) in consultation with our office pursuant to 36 CFR 800.13. Also, should the consulted-upon scope of the work change, please contact our office for continued consultation under Section 106 of the National Historic Preservation Act.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Dawn DiPrince
State Historic Preservation Officer