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February 6, 1978

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BWB

Director
Office of Surface Mining Reclamation
and Enforcement
Department of the Interior
Washington, D.C. 20240



Re: Valley Camp of Utah, Inc.
Plan of Reconstruction

Gentlemen:

This letter is written on behalf of Valley Camp of Utah, Inc. (VC Utah), a coal mining company having existing operations near the town of Scofield in Carbon County, Utah. Correspondence regarding the subject matter of this letter should be addressed to the undersigned at the address shown on the letterhead.

It is the position of VC Utah that its present operation is in substantial compliance with existing law and the regulations now being administered by your office. It is also the position of VC Utah that its existing plans of operation substantially comply with the requirements concerning plans contained in those regulations.

While VC Utah believes its operations in Utah are in substantial compliance, there appear to be some specific areas in which compliance must be verified, and it is possible that slight modifications to existing plans must be approved and implemented in order to strictly adhere to the terms of the act and the newly promulgated regulations.

By this letter VC Utah is requesting that it be given at least six (6) months to bring its existing operations into compliance with said requirements. The reasons for this request are as follows:

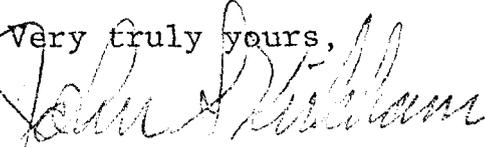
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1. The high elevation of VC Utah's mines (Utah No. 2 - 7,700 feet; Belina No. 1 - 9,200 feet) makes it physically impossible to design or reconstruct the pre-existing facilities because at the time the regulations were promulgated and at all times since said promulgation the surface has been covered with snow. At the date of this letter the snow depth at Belina No. 1 exceeds 100 inches.
2. The surface affected by such reconstruction is partially or wholly owned by third parties subject to a surface lease to VC Utah. It appears that this lease must be amended or renegotiated prior to any activities which will affect the surface.
3. The union workers at the mines have been on strike since December 6, 1977 and all available personnel have been engaged in other activities making them unavailable for surface reclamation design work.

At such time as VC Utah can prudently perform the required work to formulate plans to bring its operations into full compliance, it will do so and such plans will be submitted for review and approval in accordance with existing regulations.

In the interim if we can be of any assistance or if you need to be communicated with VC Utah, please do not hesitate to contact us.

Very truly yours,



John S. Kirkham

JSK/jt

cc: Ronald W. Daniels
State of Utah
Division of Oil, Gas & Mining