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CIRCULATE TO

DIRECTOR _____
 PETROLEUM ENGINEER _____
 MINE COORDINATOR _____
 ADMINISTRATIVE ASSISTANT _____
 ALL _____

RETURN TO Sack
 FOR FILING
 WESTERN DISTRICT COAL OPERATIONS



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BOB
United States Steel Corporation

P. O. BOX 807
 EAST CARBON, UTAH 84520

February 27, 1978



File a ss
NOT/007/012

Mr. Cleon Feight, Director
 Division of Oil, Gas and Mining
 1588 West North Temple
 Salt Lake City, Utah 84116

Re: Surface Mining Reclamation
 Enforcement Provisions

42- Federal Register 62639,
 December 13, 1977

42- Federal Register 001,
 February 7, 1978 (Amended)

Dear Sir:

The Western District- Coal Operations of The United States Steel Corporation is engaged in the underground mining of coal in the state of Utah which will be subject to the requirements of Part 717 of the above regulations.

Pursuant to Section 710.11(a)(3)(ii) of the regulations, these mining operations must be in compliance with the requirements of Part 717 by May 4, 1978 unless the criteria as amended on February 7, 1978 and set forth in Section 710.11(d)(2), relating to preexisting, nonconforming structures or facilities, are satisfied. The initial criterion that must be satisfied is the submission by March 1, 1978 of a written statement demonstrating the physical impossibility of bringing the structure or facility into compliance by March 9, 1978 with reiteration of the steps to be taken for the reconstruction of the nonconforming structure or facility.

The Western District- Coal Operations of the United States Steel Corporation is in the process of conducting an inventory of its various underground coal mining operations to determine what structures or facilities will not be in compliance on May 4, 1978. Although the inventory has not been completed it is believed that there will be many instances of inability to comply by May 4, 1978. In addition, some specific situations will require discussions with agency personnel for clarifications on whether or not the existing structure or facility is in compliance with the requirements of the regulations.

With the short period of time between the date of publication of the final regulations and the March 1, 1978 submission date the Western District- Coal Operations of the United States Steel Corporation does not believe that a reasonable amount of time has been allowed to fully identify all preexisting, noncomplying facilities and to determine the detailed steps of reconstruction required by the regulations.

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Since compliance with the procedure in Section 710.11(d)(2) as now amended is the only manner in which time beyond May 4, 1978 to achieve compliance may be obtained, the Western District- Coal Operations of the United States Steel Corporation requests that it be granted additional time beyond March 1, 1978 to submit the statements of physical inabilities to comply and the steps of reconstruction of noncomplying structures and facilities identified by the Western District- Coal Operations of the United States Steel Corporation,

Sincerely,

Paul E. Watson
General Superintendent
Western District- Coal

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cc: J. Anderson
B. Tennant
D. Minoit
J. Moffitt (USGS)