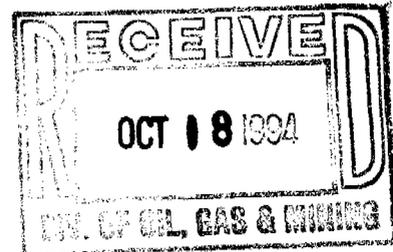


**GENWAL COAL COMPANY**

September 16, 1994

Mr. Joe Helfrich  
Division of Oil, Gas and Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203



Re: WELLINGTON PREP PLANT - ASCA's & SAE's

Dear Mr. Helfrich:

We request that the due date for submittal of the requested MRP amendment modifying the Alternate Sediment Control areas (ASCA's) at the Castle Valley Resources Wellington Coal Loadout be extended to November 11, 1994.

The Coal Regulatory Program Directive Tech - 003 was delivered to the Wellington Coal Loadout site on August 26, 1994 by Mr. Steve Demczak (DOGM). The directive and the Wellington ASCA's were reviewed with Mr. Larry Johnson (Genwal) and differences were found between how ASCA's are to be implemented according to the Directive and how ASCA's have been implemented at the Wellington Site. Larry Johnson was then verbally instructed by Mr. Demczak that Wellington has 30 days to make a submittal resolving the discrepancies.

Arrangements were made to have a consultant (Greg Poole of HA&L with the Mt. Nebo Scientific team) visit the site August 31 to review the requested changes in the field. During the course of the field visit it became obvious that communication was needed with DOGM permitting staff to clarify the directive and the ongoing work on the mid-term permit renewal.

Phone calls were placed with Mr. Daron Haddock (DOGM) the day following the consultant field visit (September 1) and a meeting was set up as early as possible with Mr. Steve Johnson and Ms. Sharon Falvey on September 8, 1994. In the September 8th meeting the consultant (Greg Poole) was informed that the directive (Tech 003) was being changed. There appeared to be significant differences between interpretations of the directive presented by Mr. Steve Johnson and Mr. Steve Demczak. It was decided to arrange a field visit to have both Steve Johnson and Steve Demczak on site to clarify how to implement the directive at the Wellington site.