

TRAIL MOUNTAIN COAL COMPANY
1200 First Security Plaza
Lexington, Kentucky 40507

1984 AUG 16 11 30 AM
UTAH MINE RECLAMATION DIVISION

August 8, 1984

Mr. Allen D. Klein
Office of Surface Mining
Brooks Towers
1020 Fifteenth Street
Denver, CO 80202

RE: Mine Permit Application of Trail Mountain Coal Company;
Our File No. PRM 0033 TMC OSM NAT

Dear Mr. Klein:

I have received your July 20, 1984, letter on the above-referenced subject. In telephone conversations with OSM representatives such as Brent Wahlquist, Glenn Tiedt and Robert Hagen, I have relayed Trail Mountain's position concerning this letter; however, I believe it is appropriate that you receive this position in writing.

Trail Mountain Coal Company ("Trail Mountain") continues to believe that the correct identity of its principal shareholder pursuant to UMC 782.13 is Natomas Coal Company ("Natomas") inasmuch as Natomas holds all of the shares of Trail Mountain. Because Natomas, and no other company, holds all of Trail Mountain's shares, no other company can qualify as a principal shareholder of Trail Mountain, because such other company could not even qualify as a shareholder of Trail Mountain.

Having properly listed Natomas as Trail Mountain's principal shareholder and supplied all corporate and compliance information applicable to Natomas, Trail Mountain has correctly supplied all information which it is required to submit in its permit application under the Utah Mining Code. For this reason, Trail Mountain's application is both accurate and sufficient, and Trail Mountain demands that its permit be issued without further delay.

Sincerely,



George S. Brooks II
Counsel

bgc

cc: Brent Wahlquist
Glenn Tiedt