

Mine file VB
Daren Haddock



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JUN 28 1990

Consolidation Coal Company
Mid-Continent Region
12755 Olive Boulevard
St. Louis, Missouri 63141
(314) 275-2300

DIVISION OF
OIL, GAS & MINING

June 26, 1990

ACT/015/015
#2

Mr. Lowell P. Braxton
Associate Director-Mining
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: Emery Permit Renewal

Dear Mr. Braxton:

The permit renewal for Consolidation Coal Company's Emery mine is due to be submitted by September 9, 1990. We were also requested to submit as much of the revision as early as possible to allow the Division additional time to review. In order to meet these objectives, we began rewriting the permit in the fall of 1989. Shortly after our work started, we were informed that the Coal Mining Rules were being rewritten and might be available in April of 1990.

During subsequent conversations with the Division, we explained that we could not complete the permit revision by September if we had to wait until April to receive the revised rules. At that time, we were told that we should use the existing regulations and that the permit would be reviewed accordingly.

Your letter of June 21, 1990 states that the Five-Year Permit Renewal should incorporate the rewritten rules. As we have completed nearly 70% of the rewrite using the old rules, it would be impossible to re-revise the permit according to the new rules in the time frame allotted.

Please let me know what problems this will create and any suggestions that you may have.

Sincerely,
Kevin L. Cheeks

Kevin L. Cheeks
Supervisor-EQC

/vms

cc: D. Haddock

Daren Please discuss This
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