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MIEC Mangum
Engineering
Consultants

*orig mine file
12/19/91 call RRP
L Braxton
Pembrough-Littig*

388 East Boynton Road • Kaysville, Utah 84037 • (801) 544-3641

30 November 1991

Dianne R. Nielson
Director
Utah Division of Oil Gas & Mining
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Ms. Nielson,

Re: Compliance Program, Co-Op Mining Company, Bear Canyon Mine,
ACT/015/025, Emery County, Utah

Last week I discussed with you specific improvements that have been made during the last six months, concerning compliance with the State of Utah - R614 Coal Mining Rules at the Bear Canyon Mine. I am writing this letter to further bring these improvements to your attention.

M.E.C. has been digitizing all of the mine plan maps into a CAD (computer aided drafting) system, greatly increasing mapping accuracy and ability to make updates and modifications. The new computer digitized maps are a significant improvement over the old hand drawn maps. This process has included more than just the base maps that were requested by the Division Order issued in Nov 1990.

In order to coordinate abatement of certain violation issues open in the spring of this year, Charles Reynolds of M.E.C was sent to the site. In addition to directing abatement activities, a review of compliance procedures, records and verification of surface facilities and drainage structures was initiated. Although these issues had been addressed previously for Co-Op Mining Co., by M.E.C., this increased interaction allowed for a greater degree of attention.

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Page 2
DOGM
30 November 1991

As a result of our thoroughness, Co-Op Mining Company contracted with M.E.C. in Sept 1991 to place a full time employee on-site to establish an improved and effective compliance program. Charles Reynolds has filled this position from its start. Positive response to this change has been received from the Division, both verbally and in writing. See letter from Pamela Grubaugh-Littig, Permit Supervisor, dated 29 October 1991.

Charles Reynolds conducts weekly inspections, transferring any concerns to Co-Op personnel assigned to conduct maintenance activities. He also assists in on-site visits and inspections made by the Division, ensuring that all concerns are properly addressed.

Co-Op Mining Co. has used a collection of consultants in the past, but has now consolidated most of the responsibility with M.E.C., and M.E.C. has increased the number of personnel working on Co-Op Mining Co. issues. We are confident that Co-Op Mining Company will benefit from our efforts and abilities and are sure that the Division will continue to be pleased with the results.

Thank you,



Kimly C. Mangum, P.E.
Permitting & Compliance Consultant.

cc: Co-Op Mining Co.
COP Coal Development Co.