

GENWAL COAL COMPANY

November 14, 1991

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

RECEIVED**NOV 19 1991****DIVISION OF
OIL GAS & MINING**

RE: Permit # ACT 015-032
Genwal Coal Company
Chapter 14 Revision

Dear Mr. Haddock:

Genwal Coal Company believes that the 30° angle of draw found in chapter 14 of our approved mine plan is unreasonably conservative. Our objections to the excessive coal loss due to the 30° angle of draw was first brought to your attention on 10/12/91 at a meeting attended by Larry Johnson, Randal Ralphs, Jay Marshall, and yourself. During the meeting I showed you a colored map showing the coal that would be lost due to the barrier required by the 30° angle of draw. At that meeting you implied that the angle of draw could be reduced or even eliminated if the appropriate EA or EIS was completed by the responsible agency. Despite being a State Lease the surface owner was USFS who would be responsible for conducting the EA or EIS which ever was appropriate.

As a result of that 10/12/91 meeting a meeting was requested with the USFS and BLM. On 10/20/91 a meeting was held in Price with Walt Novak, Pete Kilbourne, Carter Reed, Steve Falk, Gary Johnson and Jay Marshall. As a result of this meeting it was determined that DOGM and not the USFS was responsible for conducting the appropriate environmental report that would be required by the USFS to allow for a reduction or elimination of the 30° angle of draw.

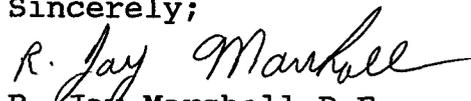
As a result of the 10/12/91 meeting with the BLM and USFS another meeting was set up to include DOGM, USFS, BLM, State Lands, and Genwal. This meeting was held on 10/24/91 in Price Forest Service office. Representing the USFS was Carter Reed, Aaron Howe, Pete Kilbourne, Laurie Kelso, Walt Novak, and Charles Jankiewkz. The BLM was represented by Stephen Falk, and Abe Elias. John Blake represented State Lands. Larry Johnson and Jay Marshall represented Genwal. Daron Haddock represented DOGM. As a result of this meeting it was determined that DOGM was ultimately responsible for approving the reduction of the subsidence angle. It was determined that OSM would not be involved. The big question was, if Genwal could submit the change as a minor revision or would it be a major modification to the mine plan. A major modification would require a public comment period which would result in a 60 to 90 day approval time which is unsatisfactory to Genwal.

On 10/28/91 You called Genwal and said that your legal people were looking at the situation but in your opinion that it would require a major modification. At that time we discussed reducing the angle of draw from 30° to 21° with the BLM supplying support data. In addition a 50% extraction within the 21° angle of draw would be requested.

As a result of the above meetings please find enclosed four (4) copies of revised pages 14-1, 14-5, 14-6, 14-36, 14-38 to 14-40, 14-42, and revised Plate 14-1 and Appendix 14-17, for your review. Once these revisions meet your approval please replace the revised pages with the corresponding pages found in the approved plan.

If you have any questions or comments please call.

Sincerely;



R. Jay Marshall P.E.
Chief Engineer
Genwal Coal Company