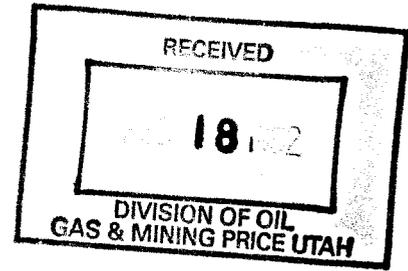


**GENWAL COAL COMPANY**

February 18, 1992

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



RE: Permit # ACT 015-032  
Genwal Coal Company  
Chapter 3 Deficiencies  
December 3, 1992 submittal

Dear Mr. Haddock:

Please find enclosed fourteen (14) copies of the response to the deficiencies for the December 3, 1991 submittal. As you recall the intent of the Chapter 3 submittal was to reflect the modifications that have occurred to Genwal's surface facilities over the last two construction periods. These modifications were done under minor revisions to the permit. DOGM had requested that Genwal rewrite chapter 3 to include these changes. It appears that comments on Chapter 8 are of the type that are found during major reviews and are beyond the original intent of the chapter 3 submittal. However, an attempt was made to address these concern as complete as possible with the time period allowed.

It would be more appropriate to address comments in chapter 8 during a major review. Genwal's MRP is up for renewal in February 1993, which fits the time frame for the LBA. Genwal feels that it would be more appropriate to address the concerns in chapter 8 at the time of the major review. I believe your technical staff will find the following responses adequate. Genwal would be more than happy to meet with you and your staff at your earliest convenience to discuss the time frame for addressing chapter 8 concerns in more detail.

As you know the surface area will be surveyed as soon as weather allows. This will put to rest questions involving the location and size of disturbed areas.

It is unknown how much if any subsoil was saved. Many concerns were about this subsoil and can not be addressed.

Genwal is not aware of any permitted area where uncontrolled drainage has caused the road embankment to erode. Maintenance of the road off the permit area is addressed with the U.S. Forest Service.

The valves from the oil storage and fuel containment area are located where they can be inspected on a routine basis, however on occasion coal may cover the valves. Times when the valves are covered are going to be rare and of short duration. During normal, routine operations the valves can be inspected. At all times the valves can be inspected even if it requires the removal of some coal. Equipment and manpower is available to move any coal should it become necessary at any time.

If you have any questions or comments please call.

Sincerely;

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