

# GENWAL COAL COMPANY

November 19, 1992

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

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DIVISION OF  
OIL GAS & MINING

RE: Permit #ACT 015-032  
Genwal Coal Company  
Amendment-Proposed Parking Expansion

Dear Mr. Haddock:

Please find enclosed, for approval, fourteen (14) copies of Chapter 3, Plate 3-1, a new Plate 3-14, Hydrologic calculations, and details reflecting a proposed area for parking expansion at the loadout area of the Genwal, Crandall Canyon Mine site.

As discussed with you on the telephone on Thursday, November 19, 1992, full details and all pertinent documentation are being submitted at this time for approval with full understanding that, upon approval, other chapters and Plates within the MRP will be modified to show "as built" design.

It is regretful but necessary that the area proposed to be used for expanded parking is a contemporaneous reclaimed area, some being within the 100' buffer limit. As we discussed, to receive a variance within this area, special circumstances would need to exist. Genwal feels that those special circumstances do indeed justify a variance and construction of the parking area.

Because of the limited parking area, employees are parking on the upper pad of the operations and along the upper road to the mine portals. These two areas are very necessary for the operation of the mine. Mine equipment, mine supply storage, vender deliveries, maintenance operations, and heavy equipment operation demand access and room to operate within these boundaries. But because of the congestion by employee parking, safety and liability is compromised, not only for the policies under Genwal Coal Company, but for the employees as well.

Enclosed with the submitted amendment is a memo from the Safety Director, Mr. Jim Pruitt, of Genwal Coal Company to Larry Johnson. In the memo Mr. Pruitt shows concern for the safety of the employees and potential accident related incidents. He has indicated that Genwal has experienced four near miss accidents and three actual accidents due to the congestion of the upper road and

pad. Also enclosed are copies of photographs showing the problem Genwal is confronted with due to the lack of employee parking areas.

Genwal has had incidents in which the company has ended up paying repair costs to employee vehicles due to mining equipment, operation, and maintenance functions. Employee cars have been run into because of the limited area mine vehicles have had to maneuver in. Employee vehicles have been oversprayed with paint during maintenance and construction functions. Genwal can foresee more liability responsibilities for employee vehicles in the future as long as the congestion on the upper road and upper pad exists.

Genwal Coal is limited to options that are allowed because of the configuration of the canyon slopes and compacted area that is available. The options that first seemed available to the company were (1)use of the USFS turn around area, (2)mandatory transportation for employees from Huntington to the mine site, and (3)addition or employee parking at the mine site. Use of the USFS turn around area was eliminated when the Forest Service was totally unwilling to allow any parking within that site. Mandatory transportation was ruled out because of the different starting times of the off shifts. Genwal has employees coming to work at other times than just 7:00am and 3:00pm. This facilitates the need of the operation of the mine more efficiently. Miners are also very independent and tend to bristle at the fact that they be forced to do something on their own time. Genwal employees miners beginning at the minesite and ending at the mine site.

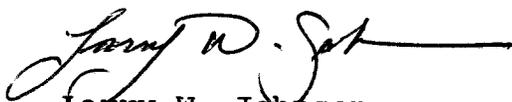
The last option available to Genwal was the location of a parking area to facilitate vehicles adequately and safely within the limited space of the mine site. It became evident that there was only one location that would be large enough to accommodate 20 to 25 vehicles. This area is shown on Plate 3-1 and design is addressed on Plate 3-14. Hydrologic calculations are addressed and has shown the design to be adequate.

Genwal feels that because of safety, liability, congestion, and the lack of space, the proposed parking area is necessary and justified. The location is obviously the only location on the mine site available for consideration.

Should you have any questions or comments, please contact me at (801)687-9813.

Sincerely,

GENWAL COAL COMPANY



Larry W. Johnson  
Engineer



R. Jay Marshall  
Chief Engineer

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