



Canyon Fuel  
Company, LLC.  
Sufco Mine

A Subsidiary of Arch Western Bituminous Group, LLC.

Ken May, General Manager  
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October 3, 2005

Ms. Pam Grubaugh-Littig  
Utah Coal Regulatory Program  
Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
P. O. Box 145801  
Salt Lake City, Utah 84114-5801

*Enclosure  
10/04/05  
Copy to H,  
Steve Miller  
Jana*

Dear Ms. Grubaugh-Littig:

Sufco recently uploaded to the Division's water database the electronic water data containing the results of the mine's 2005 second quarter water monitoring. While this task was being performed, it became apparent the laboratory data for two sample sites, 041 and 042, were missing. We received the field data for these two sites from Petersen Hydrologic, Inc, the company responsible for performing the mine's quarterly water monitoring. However, SGS, the laboratory responsible for performing the data analysis on samples delivered to their facility by Petersen, did not forward to the mine either a paper copy or electronic copy of the sample analyses. Upon discovering this data discrepancy, both SGS and Petersen were contacted to determine where the data could be found. The results of the inquiry to-date have not solved the mystery of the missing data.

Petersen provided his field sheets as proof that he and his staff had indeed been to the site, taken the appropriate field measurements, and obtained the necessary lab samples. Unfortunately, he was unable to locate a chain-of-custody to prove the samples were delivered to the lab for analysis. This is not an unusual occurrence since samples are frequently collected late during the day and delivered to the lab after hours when lab personnel are unavailable to sign and create a copy of the chain-of-custody. Also, there are instances where the samples are delivered after business hours to the homes of lab employees willing to take custody of the samples and deliver them to the lab the following day. Historically, Sufco has not had significant trouble with Petersen losing samples or failing to obtain all of the necessary samples.

Searches of the received laboratory sample logs by SGS laboratory personnel have not resulted in the missing samples being found. Without a copy of a chain-of-custody, the mine is unable to track the history of the samples once they left Petersen's control. SGS has searched other mine sample logs and results to determine if they were misplaced or credited to the wrong mine. This search was unsuccessful in locating the missing samples. SGS personnel are not optimistic they will find the samples and Petersen's search of likely places that samples may be miss placed has been fruitless. It appears at this point it is unlikely the samples will be found.

To avoid this situation in the future, we will ask that all samples delivered to the lab have some sort of chain-of-custody proof. This may include making certain an original chain-of-custody is

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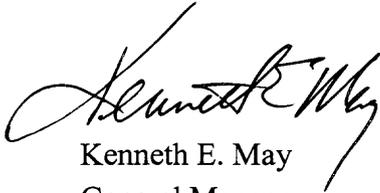
October 3, 2005

Page 2

left with all samples left after hours and then calling the lab the following day for a copy of the chain-of-custody with their signature demonstrating their receipt of the sample. Another, less desirable, solution could include not delivering samples after hours. The appropriate solution to this problem will be determined after consultation with Petersen Hydrologic, Inc. and the receiving lab.

If you have any questions regarding this issue, please give me a call at (435) 286-4400 or Mike Davis at (435) 286-4421.

Sincerely,  
CANYON FUEL COMPANY, LLC  
SUFCO Mine



Kenneth E. May  
General Manager

cc: DOGM Price Office  
DOGM Correspondence File

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