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**Operations Department
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Date: August 18, 2008

Name of Sender: Duke Vctor

Transmit to: Patricia Silvey

At Phone Number: 202-693-9441

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August 18, 2008

Ms. Patricia Silvey
Director of Standards, Regulations and Variances
Department of Labor
Mine Safety and Health Administration

RE: Cleveland-Cliffs Inc Support of National Mining Association Comments in August 18
Letter to Patricia Silvey, Director of Standards, Regulations & Variances, on MSHA's
Proposed Rules on Refuge Alternatives for Underground Coal Mines

Dear Ms. Silvey:

The purpose of this letter is to communicate Cleveland-Cliffs support for the recommendations put forth by the National Mining Association in its letter regarding MSHA's Proposed Rules on Refuge Alternative for Underground Coal Mines.

Cleveland-Cliffs employ approximately 900 people in four underground coal mines and associated facilities located in West Virginia and Alabama. We fully support efforts to enhance miner safety in the event that miners cannot escape in an emergency situation. To that end, we have already placed orders for the full compliment of rescue chambers for our mines and expect to begin taking delivery of the chambers before the end of 2008.

The NMA makes a number of recommendations that Cleveland-Cliffs believes would clarify and help finalize rules regarding refuge alternatives.

Specifically, Cleveland-Cliffs supports the NMA's recommendation that MSHA unconditionally accept state approved refuge chamber units as meeting all requirements of the final rule, as well as the need for MSHA to provide clarity and finality to this question as soon as practical in advance of publication of the final rule. In addition, Cliffs believes that MSHA should only require modifications to existing units if the unit's design and functional capabilities will not, when properly maintained and operated, sustain life for the required period of time.

Existing units have been designed and engineered to provide occupants with, at minimum, 96-hours of life sustaining support and to maintain a temperature of 95 degrees Fahrenheit. Additionally, the units are designed to conform to mine specific considerations, including space limitations. Cleveland-Cliffs made a significant financial commitment to comply with the new standards, to impose requirements that effectively render these units non-compliant or require the purchase and placement of additional units is unwarranted.

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Cleveland-Cliffs also support:

- The NMA's recommendation regarding the requirement for outby refuge alternatives should be on a case-by-case, site-specific basis and the conflict regarding distance requirements (West Virginia statute and Section 75.1506 (b)(1)) should be resolved by:
 - requiring the placement of refuge facilities within 2,000 feet of the working face and from locations where mechanized mining equipment is being installed and removed,
 - The requirement for rigorous underground testing of refuge chambers before finalizing rulemaking on refuge chambers.

In conclusion, I would like to convey my thanks and appreciation to both the National Mining Association and the Mine Safety and Health Administration for the opportunity to participant in the process of developing standards that will help to further enhance miner safety.

Sincerely,



Duke Vetor
Senior Vice President
North American Coal
Cleveland-Cliffs Inc

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