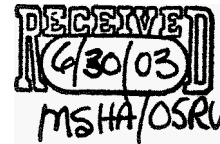


C Canyon Fuel Company, LLC

SUFCO Mine
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(435) 286-4880 Fax: (435) 286-4499



June 27, 2003

Mr. Marvin W. Nichols
Office of Standards, Regulations, and Variances
Room 2313
1100 Wilson Boulevard
Arlington, Virginia 22209-3939

Re: Proposed Rule; Safety Standards for the Use of a Belt Entry as an Intake Air Course To Ventilate Working Sections and Areas Where Mechanized Mining Equipment is Being Installed or Removed

Dear Mr. Nichols:

Canyon Fuel Company, Sufco Mine submits the following comments addressing the 30 CFR Part 75, Safety Standards for the Use of a Belt Entry as an Intake Air Course To Ventilate Working Sections and Areas Where Mechanized Mining Equipment is Being Installed or Removed; Proposed Rule. Canyon Fuel Company, Sufco Mine fully supports the use of belt air to ventilate working sections and we are currently successfully using this system. We feel the following items in the proposed rule should be addressed:

1. **30 CFR 75.350(c)(3)**. The proposed regulation requires the point feed regulator have a means of closing remotely. We believe this type of system would be difficult to maintain and would be difficult to install on a regulator.
2. **30 CFR 75.351(a) and 30CFR 75.351(c)(3)**. This proposed regulation requires the mine operator to have a designated AMS operator at a location where signals from the AMS can be seen and heard. Sufco believes a better option would be to have an operator at a location where the signal can be seen **or** heard. An operator can perform other tasks and quickly respond to a signal that is seen **or** heard. This type **of** system is currently employed at Sufco and is working well.
3. **30 CFR 75.351(b)(1)**. In this proposed regulation, the mine operator is required to designate a single location where AMS signals are received and two-way communications are maintained. This is very restrictive and is not necessary to achieve the intended goal. If more **than** one location is allowed the mine operator can utilize the resources and personnel already in place and have some flexibility in doing so.
4. **30 GFR 75.351(r)**. This proposed regulation requires voice communications lines to **be** in a different entry than AMS lines. Sufco mine has miles of communication lines in the same entry as the AMS system lines. There has never been an incident or indication that this may be a problem. Requiring **the** two lines be separated will only move one of the lines into an entry where the likelihood of being damaged is greater. Therefore we feel the proposed regulation will complicate and endanger a system that is working well.

Comments were requested on the need for and maintainability of lifelines in escapeways. Sufco Mine currently maintains a lifeline in portions of the secondary escapeway at the mine. This lifeline is located in the main returns and is routed to the closest portal. Maintaining a lifeline in the intake entries would be nearly impossible given the amount of mobile equipment used at the mine. Travel into and through crosscuts is necessary in daily operation. Any lifeline in these areas would surely be damaged on a regular basis. Sufco believes that lifelines should be installed on a voluntary basis in a location that will serve its purpose best at each mine.

Sufco mine has effectively used belt air to ventilate the working face for over **25** years. Many of the proposed regulations are already a part of our approved ventilation plan. Sufco mine would prefer to continue to operate under our approved vent plan and “grandfathered” status regarding using belt air for intake at the working face. If the rule is adopted we believe the concerns outlined above should be addressed. We appreciate the opportunity to comment on the proposed rule.

Sincerely,
CANYON FUEL COMPANY, LLC
SUFCON Mine



Kenneth E. May
Mine Manager