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Comments Regarding Sealing of Abandoned Areas

- To inert a sealed area would cost a mine operator thousands of dollars especially if the area sealed is very large. With production costs and other safety costs, the action taken to inert an area behind a seal is economically non-feasible for a mine operator. With fractured strata the nitrogen or alternate substance that is pumped into the sealed area to dilute and inert the sealed area will leak through the fractures of the surrounding strata while methane continually enters the mined area at a constant rate and then an explosive mixture is present once again.
- MSHA continues to propose and mandate new seals regulations which leads me and I am sure the rest of the coal industry to believe that this will be a continual process costing the coal industry thousands of dollars. I am sure you are aware of the fact that NIOSH has conducted experimental explosions and recorded pressures exceeding 600 psi. When an explosion does occur behind a sealed area the pressure from the explosion has to propagate to relieve the pressure(when the sealed area is pressurized), therefore no matter how strong the seal, the explosion will blow out the weakest point whether that be the seal or the coal in the surrounding pillar of the seal. Which brings me to the point; what is the point of increasing the strength of a seal?
- The purpose of increasing a seal's strength from 47 to 50 psi is also unjustifiable considering my previous point that the pressure from the explosion will not be contained whether the seal is 47, 50 or 120 psi.
- The reinstallation of prior built seals would cause two major problems; cost and safety. Many coal mines in America have several sets of seals and to rebuild these seals would cost the mine operator thousands of dollars to do so and expose the constructor of the seals to grave danger when breaching these seals. If the seals were not breached and a set of seals were constructed in front of them; in many cases there would not be of room along the pillar to construct a new set of seals and this would also expose the constructor to grave danger when constructing the seals due to the fact that seals breathe and the possibility of igniting an explosive mixture outby the sealed area.
- MSHA has informed us that we can not use samples prior to May 22, 2007 but in my reasoning wouldn't these samples prior to May 22 be more representative of the sealed area considering that the samples are covering a larger time frame, rather than 14 days of outgassing after May 22.
- MSHA has also informed us that an open flame is restricted in areas within 150 feet of a seal, therefore eliminating maintenance on a preset head-drive that is within 150 feet of a seal. I suggest that some type of alteration to the law be made so that mine operators are able to perform maintenance on these head-drives because there is no other option to maintain these head-drives.
- To deem a professional engineer liable for the construction of a seal for the life of the seal is irrational. If the engineer that designed the seal retires, he/she should no longer be liable for that seal for the simple fact that he/she will no longer be monitoring that seal or have the responsibility of maintaining the seal as that responsibility should be passed on to his/her predecessor. The maintenance of the

seal(s) certified by that engineer is actually out his control leaving the engineer liable for other individuals' mistakes.

Seal Comments

SOUTHEASTERN KY 407
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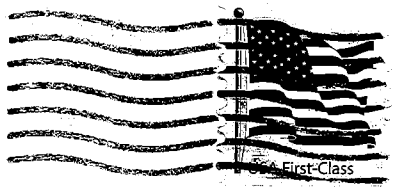

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