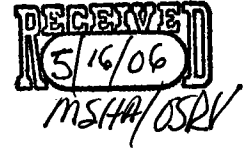


Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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Sincerely,

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Miner for Advent Mining

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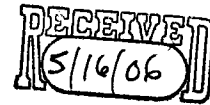
Sincerely,

A handwritten signature in black ink that reads "Samuel Lipsa". The signature is written in a cursive, somewhat stylized font.

Miner for Advent Mining

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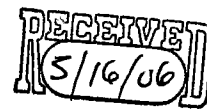
Sincerely,

A handwritten signature in black ink that reads "Heath Tucker". The signature is written in a cursive, somewhat stylized font.

Miner for Advent Mining

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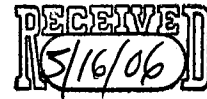
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Sincerely,
A handwritten signature in black ink that reads "Seth Cobell".

Miner for Advent Mining

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Office of Standards, Regulations, and Variances
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May 4, 2006



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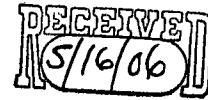
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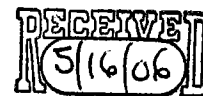
Sincerely,

A handwritten signature in black ink that reads "Bruce Clark". The signature is written in a cursive style.

Miner for Advent Mining

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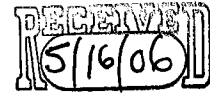
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Miner for Advent Mining

A handwritten signature in black ink, appearing to be "John P. [unclear]". The signature is written in a cursive, flowing style.

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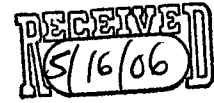
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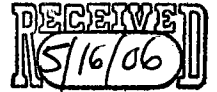
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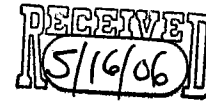
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A handwritten signature in cursive script that reads "Edwin Williams". The signature is written in black ink and is positioned above the typed name.

Miner for Advent Mining

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A handwritten signature in black ink, appearing to be "Chris Smith". The signature is written in a cursive, somewhat stylized font.

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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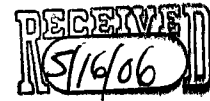
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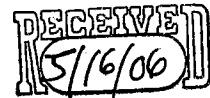
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Sincerely, *Danell Aoir*

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
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May 4, 2006



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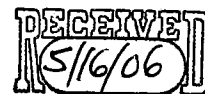
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Miner for Advent Mining

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Office of Standards, Regulations, and Variances
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Arlington, VA 22209-3939

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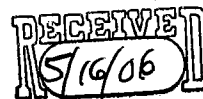
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Miner for Advent Mining

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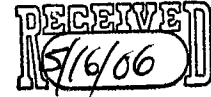
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Charles R. Knight Miner for Advent Mining

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Office of Standards, Regulations, and Variances
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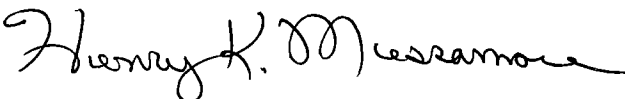
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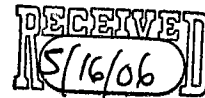
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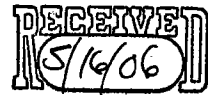
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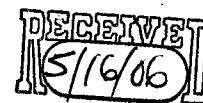
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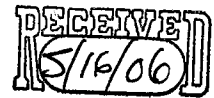
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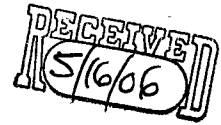
Sincerely,

A handwritten signature in black ink that reads "Arden Bentley". The signature is written in a cursive style with a large, sweeping flourish at the end.

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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May 4, 2006



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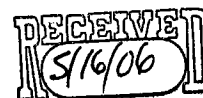
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Miner for Advent Mining

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May 4, 2006



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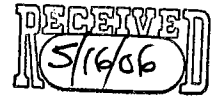
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May 4, 2006



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May 4, 2006



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May 4, 2006

RECEIVED
5/16/06

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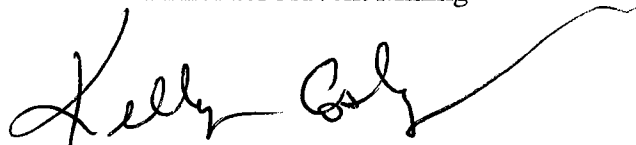
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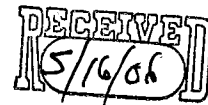
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Miner for Advent Mining

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May 4, 2006



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Charles A. Humphrey
Miner for Advent Mining

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May 4, 2006



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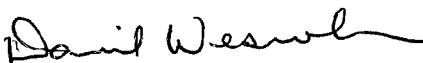
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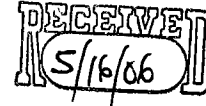
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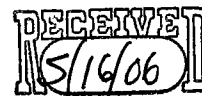
Sincerely,

A handwritten signature in black ink that reads "William Withe". The signature is written in a cursive style.

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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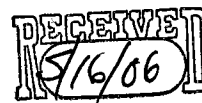
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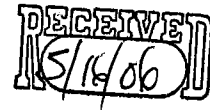
Sincerely,

A handwritten signature in black ink that reads "Paul Holt". The signature is written in a cursive style with a long, sweeping underline.

Miner for Advent Mining

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Office of Standards, Regulations, and Variances
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A handwritten signature in black ink that reads "Chris Wolfe". The signature is written in a cursive, flowing style.

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A handwritten signature in black ink that reads "James Faller". The signature is written in a cursive style.

Miner for Advent Mining

RECEIVED
5/16/06

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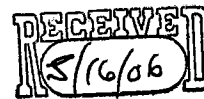
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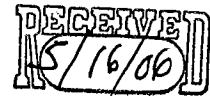
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A handwritten signature in black ink that reads "Michael McJannet".

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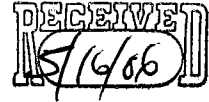
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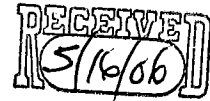
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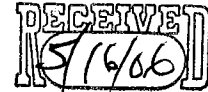
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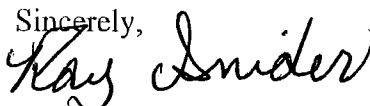
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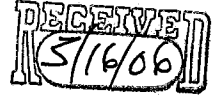
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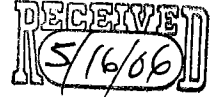
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Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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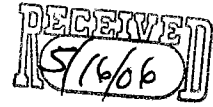
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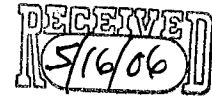
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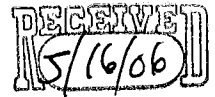
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A handwritten signature in black ink, appearing to read "Lundal E. Joch". The signature is written in a cursive style with a long horizontal line extending to the right.

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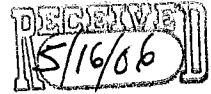
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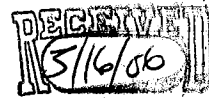
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May 4, 2006



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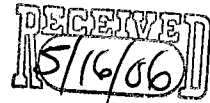
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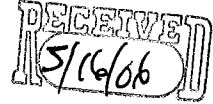
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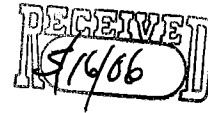
Sincerely,

A handwritten signature in black ink, appearing to read "Jan T. [unclear]".

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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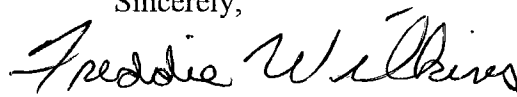
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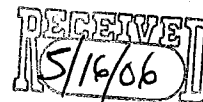
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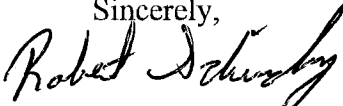
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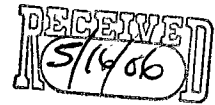
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A handwritten signature in black ink that reads "Mike McCreger". The signature is written in a cursive, somewhat slanted style.

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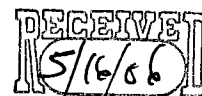
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Sincerely, *Brent Mennel*

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Sincerely, *Bej Mason*

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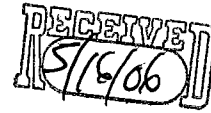
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Thank you for your attention to my concerns.

Sincerely,

Mike Clayton
Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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Sincerely,

A handwritten signature in black ink that reads "Terry Bush". The signature is written in a cursive, flowing style.

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



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Sincerely,

A handwritten signature in black ink, appearing to read "Derek W. Lynch". The signature is written in a cursive, flowing style.

Miner for Advent Mining

RECEIVED
5/16/06

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006

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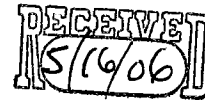
Sincerely,

Lawrence Benson

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



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Miner for Advent Mining

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May 4, 2006



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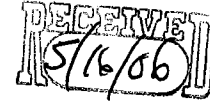
Sincerely,

A handwritten signature in black ink that reads "David Hancock".

Miner for Advent Mining

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Office of Standards, Regulations, and Variances
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May 4, 2006



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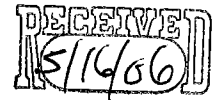
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A handwritten signature in cursive script that reads "William R. Smith".

Miner for Advent Mining

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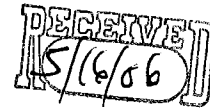
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Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
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Arlington, VA 22209-3939

May 4, 2006



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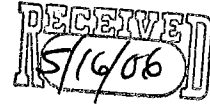
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Sincerely, Hancock, Brian C.
Brian C. Hancock
Miner for Advent Mining

Mine Safety and Health Administration
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May 4, 2006



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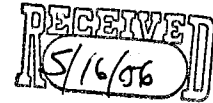
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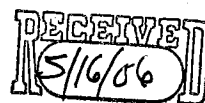
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A handwritten signature in black ink that reads "Gareth Durcan". The signature is written in a cursive style.

Miner for Advent Mining

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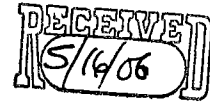
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Thank you for your attention to my concerns.

Sincerely,

A handwritten signature in black ink that reads "Barry Beard". The signature is written in a cursive, slightly slanted style.

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



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James W Bigger

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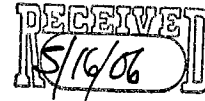
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Miner for Advent Mining

A handwritten signature in black ink, appearing to read "Pat Steelman". The signature is written in a cursive, somewhat stylized font. Below the signature, the name "Pat Steelman" is written in a simpler, blocky font.

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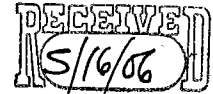
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A handwritten signature in black ink, appearing to be "Dg Mj", written over a horizontal line.

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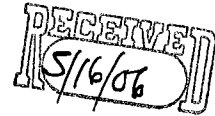
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Lawrence M. Hobdy
Miner for Advent Mining

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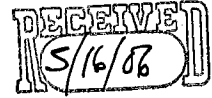
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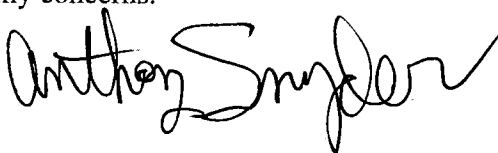
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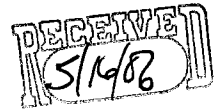
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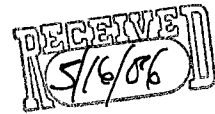
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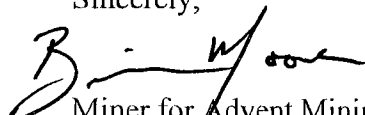
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Thank you for your attention to my concerns.

Sincerely,


Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



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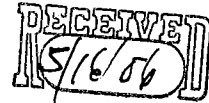
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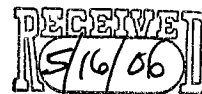
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A handwritten signature in black ink that reads "Mark B. Stone". The signature is written in a cursive style with a long horizontal line extending to the right.

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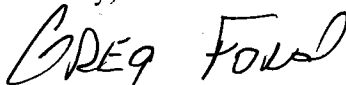
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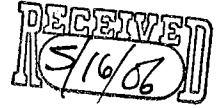
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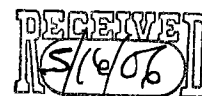
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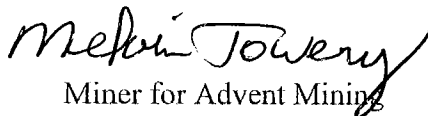
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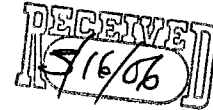
Thank you for your attention to my concerns.

Sincerely,

A handwritten signature in cursive script that reads "Ray Davis".
Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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Sincerely,

A handwritten signature in cursive script that reads "Amen Davis".

Miner for Advent Mining

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Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
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May 4, 2006



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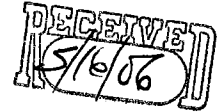
Sincerely,

A handwritten signature in black ink that reads "Jason Jarvis". The signature is written in a cursive style with a large initial "J".

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
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May 4, 2006



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Sincerely,

A handwritten signature in black ink that reads "Kevin Bigger". The signature is written in a cursive, slightly slanted style.

Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
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May 4, 2006



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Miner for Advent Mining

A handwritten signature in dark ink that reads "Jason Parker". The signature is written in a cursive, flowing style.

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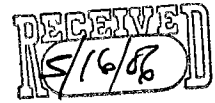
Sincerely,

Miner for Advent Mining

A handwritten signature in black ink that reads "Paul Harney". The signature is written in a cursive, flowing style.

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
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May 4, 2006



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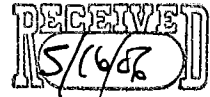
Sincerely,

Bill Thomason

Miner for Advent Mining

Mine Safety and Health Administration
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1100 Wilson Blvd., Room 2350
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Sincerely,

A handwritten signature in black ink that reads "Roger Shoulders". The signature is written in a cursive style.

Miner for Advent Mining

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Office of Standards, Regulations, and Variances
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Arlington, VA 22209-3939

May 4, 2006



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Sincerely,

A handwritten signature in black ink, appearing to read "A. Wall". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Miner for Advent Mining

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Miner for Advent Mining

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Finally, the ETS commentary suggests what is called the "heart rate" method to determine the appropriate distance for caches. I am very concerned about this suggested method. I do not believe it is practical, effective or reliable to expect those working underground to determine a "worst case scenario." This method requires a judgment about which miner appears to be the slowest to be able to evacuate. This could change day to day, depending on the employees, whether someone is injured or even whether one miner doesn't feel well on a particular day. Mining is physically demanding enough without asking one of our miners (especially one who is physically poorly suited) to engage in a physically demanding exercise. I understand that the height/distance chart contained in the MSHA Policy Manual has been adopted in West Virginia, and I would suggest that this chart or another objective standard be adopted.

Thank you for your attention to my concerns.

Sincerely,


Miner for Advent Mining

Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

Dear Sir or Madam:

I am an hourly miner employed by Advent Mining and am writing this letter to offer my comments on MSHA's Emergency Temporary Standards ("ETS"). First, I do not agree with the new training requirements. Current training does not require miners to physically travel the entire distance of the escapeway. In my experience, the current practice ensures that all miners are familiar with the primary and secondary escapeways. For example, when I go to work I travel one of the escapeways into the mine. I have not worked with anyone in the mines who did not know where the escapeways were located or which direction to travel. Requiring miners to participate in a physically exhausting practice drill does not increase safety. In fact, it may actually increase risk by making miners walk (or, in some cases, crawl) thousands of feet through the mine. At the very least, we should be allowed to travel the escapeway by mechanical means, rather than on foot.

I am also concerned about the "expectations" training mentioned in the ETS commentary, especially the suggestion that drills be practiced in smoke. No training should expose miners to smoke or other dangerous conditions. The risk, no matter how small, of actual injury is too great.

Third, since pumpers, examiners, fire bosses and others are not assigned to one location in the mine often travel through the mine on foot, I would suggest that the caches along the escapeways contain extra SCSRs for these individuals. Otherwise, they may be required to actually carry an extra unit with them.

Finally, the ETS commentary suggests what is called the "heart rate" method to determine the appropriate distance for caches. I am very concerned about this suggested method. I do not believe it is practical, effective or reliable to expect those working underground to determine a "worst case scenario." This method requires a judgment about which miner appears to be the slowest to be able to evacuate. This could change day to day, depending on the employees, whether someone is injured or even whether one miner doesn't feel well on a particular day. Mining is physically demanding enough without asking one of our miners (especially one who is physically poorly suited) to engage in a physically demanding exercise. I understand that the height/distance chart contained in the MSHA Policy Manual has been adopted in West Virginia, and I would suggest that this chart or another objective standard be adopted.

Thank you for your attention to my concerns.

Sincerely,

A handwritten signature in black ink that reads "Cody Bates". The signature is written in a cursive, somewhat slanted style.

Miner for Advent Mining