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November 5, 2007, 2007
"RN1219-AB56"
Office of Standards, Regulations, and Variances
1100 Wilson Boulevard, Room 2350
Arlington, Virginia 22209-3939

Dear Sirs and Madams,

The Indiana Bureau of Mines and Peabody Coal Company's Black Beauty team trainers attended the Public hearings in Lexington, Kentucky. There were some concerns expressed and some of them were as follows:

I. The regulation that requires the mine rescue teams to train at each mine site that it covers is an issue that does not fulfill the needs of training. We propose that the same training could be accomplished by having the mines come to teams' practices and go over their mine's ventilation, escapeways, etc. We do go underground twice a year and we rotate the mines that we visit each year thus making each of our rescue teams familiar with the mine locations and workings. To visit each mine site once each quarter or twice each quarter is not in the best interest for the mine rescue training of our teams. This would entail hours of travel to and from the mine sites, and this time could be better spent with actual training. The mine rescue teams are trained miners who if given a job and a map of a coal mine not only in their coverage area but state to state could negotiate were they are to travel in any given mine. The proposed new regulation on this issue is to time consuming and not cost effective, taking workers away from their mine jobs and really not benefiting or strengthening the training of our teams. A point that was also brought up was that the mine at which a disaster occurred would not be in the same condition it would be before an event took place and would not be in the condition that you saw when you were there.

II. If the teams that now cover the given mine sites whether it is six mines or thirty mines, to meet the regulations, would put such a burden on the teams that they would be strained or in some cases could not fulfill the law as it is written, this could lead to mines not being covered by the two teams that they need and in such cases that mine or mines would have to be idled because they would not have the two team coverage required by law.

III. The requirement for two member's from each mine site for a composite team is a good idea, but the one draw back is, what if you can not get two volunteers from that mine. Then you would have to take away the word voluntary and make it mandatory, which then would give you a team member who may or may not be ready, willing and able to perform mine rescue operations to the best of their ability and could put another team member's life endanger.

Respectfully,

Don "Blink" McCorkle, Deputy Commissioner, Indiana Bureau of Mines and Greg Xanders, trainer for Black Beauty's Mine Rescue Teams, and Training instructor at Peabody's Midwest Training Center.