

Litvin

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From: David A. Litvin [mining@xmission.com]
Sent: Friday, November 16, 2007 6:30 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Cc: Mike Cooper; Ralph Sanich; Kevin Tuttle; Kent Eden; Gary Leaming
Subject: RIN 1219-AB53

Importance: High

Attachments: Canyon Fuel Letter on Mine Rescue Teams.jpg

Dear MSHA Officials:

As a follow-up to my testimony in Salt Lake City before the MSHA panel on the Mine Rescue Team proposal on October 23, 2007, please find an attached letter from Mike Cooper, Safety Manager for the Skyline Mine. I would ask that this letter be made a part of the official MSHA record on this proposed rule making.

I also wish to thank the MSHA panel for holding a meeting on this important matter in Salt Lake City. If I can be of further assistance on this proposed rulemaking, please let me know.

Best regards,

David Litvin
President
Utah Mining Association
office: 801-364-1874



Canyon Fuel
Company, LLC
Skyline Mine

A Subsidiary of Arch Western Bituminous Group, LLC

Mike Cooper, Safety Manager
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Helper, UT 84526
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October 30, 2007

Dear Mr. David Litvin,

Skyline mine has two trained mine rescue teams. In Arch Western, each of our underground mines (Sufco, Dugout, West Elk, and Skyline) takes a turn hosting two training days at their minesite. This allows both teams at each mine to take a turn training at our sister mines. This involves a total of 8 training days. Training includes traveling underground and going through a disaster scenario/problem. It also includes specialty training (Firefighting, Rope Rescue, Mine Maps, etc.) on the surface. This inter-company training is very beneficial to all our teams. The teams become familiar with each others facilities and are able to cross train with those they would be backing up in an emergency. This practice also allows the schedule to be arranged to avoid critical times like longwall moves, high vacation/holiday schedules, etc. All mines still plan on sending a team to competition or to Edgar mine occasionally. The Mine Rescue Competition sponsored by MSHA is more an opportunity to show off the results of your training, than a training exercise. Quality Mine Rescue Training is without a doubt the most important aspect of mine rescue. There should be requirements to insure all Mine Rescue teams receive proper training. That they have the opportunity to become comfortable with the equipment they use and they know the facilities they may respond to. Teams should be accredited more for holding good proper training than if they attend a competition.

The 2-hour response requirement for Mine Rescue Teams should remain in effect. Skyline has highly experienced team members that live more than 60 miles from the mine-site. Changing response requirements to 1-hour would create untrained, inexperienced teams for quit some time. Example: One of our team captains lives in Springville, Utah. He is 68 miles from the mine. Most of the speed limit is 55 to 60 mph up a mountain highway. In order to meet the proposed requirement this team member would have to hurry to the point his driving would put him at risk or that he breaks the law. This is not acceptable. He has been a Mine Rescue team member for more than 15 years and has devoted endless amounts of time and energy. Team members should be chosen based on their abilities and dedication, not on where they live.

Sincerely,

Mike Cooper
Safety Manager/Skyline Mine