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November 23, 2011

M.S.H.A.
Office of Standards, Regulations and Variances
1100 Wilson Blvd.
Room 2350
Arlington, VA 22209-3939

2011 NOV 23 A 10:30

Re: RIN 1219-AB65
Comments: Proposed Rule Proximity Detection Systems for Continuous Mining Machines in Underground Coal Mines.

Dear Sirs;
The following are the comments of Bowie Resources

75.1732 (a) Proximity Detection Systems

The 18-month time limit to have in-service continuous miners retrofitted with proximity detection systems seems to be an impossible time limit.

It is the view of Bowie Resources that very few of the 1,150 continuous miners in service will be replaced with new or re-built machines.

The majority of the in-service machines will then require an in-mine retro-fit.

Information provided to Bowie by one equipment manufacturer is that the success of proximity detection is "highly dependent on machine integration, therefore (detection system) will only be installed in the field if a machine has been made prox ready ..."

It is the understanding of Bowie Resources that "prox ready" would require a shop type rebuild and preparation of the machine.

A representative of the manufacturer along with a representative of a proximity detection manufacturer seemed to modify the above statement when making comments in the October 18, 2011 Public Hearing in Denver the point was still made that the success of the proximity detection systems both in acceptable performance and acceptable maintenance requirements depends on thoughtful and careful installation.

Bowie agrees that in order for the detection systems to work properly they must be installed properly.

A system cannot be installed underground in one maintenance shift.

The time requirement for retro-fitting in-service continuous miners needs to be extended to 24-months after the date of publication.

75.1732 (b)

The requirement to stop the continuous miner no closer than 3-feet from a miner may not be possible under all conditions.

AB65-2COMM-20

75.1732 (b) needs to be re-worded to "cause the continuous miner to interrupt the tramming function no closer than 3-feet from a miner.

75.1732 (d) (1) and (d) (2)

The wording of these regulations would require that a record of defects, corrective actions, and the date of corrective action must be recorded in a record kept underground.

A record of the checks made under (c)(1) and (c)(2) kept with the record of dust control parameters would work the same, however a record of defects and corrective actions should be made at the end of the shift in a book kept on the surface.

Sincerely



Ernal A. Shaw
Safety Manager