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• Comments:

RIN 1219-ABGS

ABGS-2COMM-30

To whom it may concern,

As continuous miner operators at Hopkins County Coal, LLC's Elk Creek Mine, we are concerned about the proposed rule regarding proximity detection systems for continuous mining machines in underground coal mines. Specifically, we are concerned that—in real life application—the proposed rule will make our jobs unnecessarily less safe than they are today. 2011 NOV 28 P 5:40

We have had the opportunity to operate a continuous miner, utilizing the Matrix proximity system. During the early stages of the proximity system at our mine, we worked with Matrix personnel to define the "red zone" to reach the goal of enhancing operator safety. Early in our efforts, we had a zone very similar to that proposed by the August 31, 2011 rule. The problem with this zone, in real life, is the proposed rule creates more dangers for miner men than it solves. Under the proposed rule, miner men would have no choice but to stand behind the tail of a continuous mining machine when it is cutting coal or rock. While the continuous mining machine is turning a cross-cut and/or loading coal into a shuttle car, we would be forced to stand in a location that would place us at a significantly higher risk of being struck by an oncoming shuttle car. So, while MSHA may have presented a rule that keeps miner men at least three feet from the continuous mining machine at all times, the proposed rule does not reduce the possibility of us being struck by mining equipment. In fact, from our experience, we believe it increases that possibility.

Currently, during the cutting process, we are allowed to be positioned in an area next to the continuous mining machine. By doing this, we are positioned in a location that is largely free of the risk of being struck by a shuttle car. At the same time, any potential hazard from the continuous mining machine is also extremely low during the cutting cycle because the continuous mining machine's movements are slower than when the continuous mining machine is not cutting and/or tramming. In fact, we are not aware of any fatal accidents occurring while a continuous mining machine was cutting coal or rock.

In closing, we strongly recommend that MSHA consider the serious concerns raised in our comments and propose that the current zone utilized by the Matrix systems be used in the final rule.

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