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To: NIOSH Docket Office (CDC)

Subject: FW: 100-mine seals

Enclosed are comments to the NIOSH Seal report that we have received from our mining operations.

INERTIZATION BEHIND NEW SEALS

- To inert behind new seals it would be necessary to inject a gas through a borehole on the surface and also inject through a pipe underground that penetrates through a set of seals back into the sealed area.
- The seals proposed in this report do not provide for any pipes to penetrate the seals, not even a water trap.
- Some surface boreholes would require U.S. Forest Service approval, if approved this would require an Environmental Impact Statement prior to any surface disturbance. This process would require a considerable amount of time.
- At some remote surface locations the necessary site could not be made accessible to the needed mechanized equipment due to the topography.
- If it becomes necessary to inert the area behind the seals, the process should be mine specific and developed based on the mines unique circumstances and the risks presented at that location.

MITCHELL/BARRETT SEALS

- If reinforcement bars are required in a Mitchell/Barrett Seal, how are the bars to be placed in the cement block structure?

HITCHING OF SEALS

- The theoretical sharp curves of a hitch cannot be effectively duplicated in most floor materials especially if you are using mechanized equipment to prepare the site.

MONITORING BEHIND NEW SEALS

- It appears that even the 640psi "not managed, not monitored" seal would require monitoring until the seal material gains full strength.
- The continuous monitoring envisioned by NIOSH is a system that involves multiple tube bundles with a surface collection site and extensive gas evaluating instrumentation. This sampling system may not be a reasonable option for some mines especially when needed only for very short time frames.
- This report provides for no other monitoring system options except for the Australian model.
- NIOSH should consider an evaluation of each set of seals on a mine by mine basis utilizing a risk based analysis and then developing a sampling protocol for that specific situation.

EXISTING SEAL AREAS

- When evaluating the area behind existing seals, consideration should be given to the sampling history and the stability of that gobs inert status.
- If a seal is to be rebuilt in a remote area that is difficult to access, consideration should be given to the material handling exposure of the miners who are trying to move the needed supplies into that location.
- Some existing seals do not have adequate space in front of them to build another seal, in order to replace a seal in this situation, it would be necessary to remove the original seal first.

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