

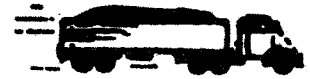


2864

ALLEGHENY MINERAL CORPORATION

P.O. Box 1022, Kittanning, PA 16201 • Phone Kittanning (724) 548-8101
Plants in Harrisville, Slippery Rock and Murrinsville

Miners and Shippers of
Coal, Clay
and Limestone



VIA ELECTRONIC TRANSMISSION
RegComments@state.pa.us

September 24, 2010

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17101-2301

RE: 25 PA Code CH. 77
Noncoal Mining Fees

Dear Board Members:

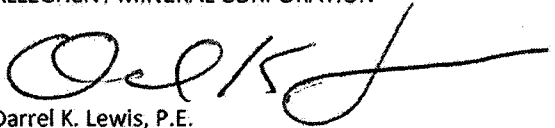
Allegheny Mineral Corporation objects to the above referenced rulemaking, as proposed in the *Pennsylvania Bulletin* (Vol. 40, No. 35, August 28, 2010, page 4964), based on the following:

- The operation of the Bureau of Mining and Reclamation permits program is a fundamental function of the state government, and should be funded as such. A modest processing fee can be justified; however, fees eighty (80) times higher cannot.
- The Department's review process is too lengthy and cumbersome for work submitted under a professional seal, an area where cost containment is highly achievable.
- Review costs for issues derived from public and resource agency comment should be solely born by the Commonwealth.
- Third party contracts could be used to economize certain functions, such as a water analysis.
- Redundant efforts, such as PNDI checks, municipality and landowner notifications, should be eliminated.

Allegheny Mineral Corporation has been a noncoal producer since 1952, and has never encountered such a drastic role shift in regulatory funding. We respectfully request the Board reevaluate these fee proposals, and adjust to a more reasonable level.

Thank you for your consideration.

ALLEGHENY MINERAL CORPORATION


Darrel K. Lewis, P.E.
Chief Engineer

DKL/kif

RECEIVED
IRRC
2010 SEP 27 P 2:17

Cooper, Kathy

2864

From: Darrel Lewis [darrel.lewis@snydercos.com]
Sent: Friday, September 24, 2010 11:42 AM
To: EP, RegComments
Subject: 25 PA Code Ch 77 - NONCOAL Mining Fees
Attachments: doc20100924103759.pdf

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IRRC

2010 SEP 27 P 2:17

Please see the attached comments regarding the above referenced proposed regulation.

Regards,

Darrel K. Lewis, P.E.
Allegheny Mineral Corporation
PO Box 1022
Kittanning, PA 16201
Darrel.lewis@snydercos.com

-----Original Message-----

From: Engineering@snydercorp.net [mailto:Engineering@snydercorp.net]
Sent: Friday, September 24, 2010 11:38 AM
To: Darrel Lewis
Subject:

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[00:c0:ee:4b:16:f7]
