

From:

"Greg McGlone" <gmcglone@shaw.ca>

To:

<les lafleur@luscar.com>

FAX 480-794-8150

Sent:

Wednesday, September 13, 2006 9:40 PM

Subject:

Input on Proposed Terms of Reference

Mr. Les LaFleur

My name is Greg McGlone, owner of 33 Embarras Drive, Robb Alberta.

The following are my comments on the Coal Valley Mining Expansion, EIA- Proposed Terms of Reference(TOR). My understanding is that the dealine for submissions is September 15, 2006.

CANADA E COM

In my opinion the following subjects are not properly articulated in the Proposed Terms of Reference and the TOR must be amended accordingly.

- 1. The Reclamation and Closure Plan must define the schedule of activities during the duration of the mining and the target date for completion and reopening of the mined areas to the General Public. Special emphasis must be placed on continuous reclamation during mining such that public access can be achieved on a continuous and as soon as possible timeframe.
- 2. The TOR needs to address the visual impact of the mining from public points of access such as highways, commercial and residential.
- 3. The TOR needs to address areas of nonalignment with the Coal Branch Sub-Regional Integrated Resource Plan (1990). The issue of "buffer zones" between mining operations and residential/commercial and watersheds must be addressed in the TOR. Where the EIA deviates from this plan, justification must be defined for the deviations.
- 4. The TOR needs to address possible negative impacts to residential land values and methods of mitigation.
- 5. In section 10, Public Consultation Requirements, the TOR must include education to the public on the process for obtaining funding for independent impact assessments, legal consultation and the establishment of Intervenor Status.

In addition, I would like to bring to your attention Mr. LaFleur that I did not receive from you the additional information July 2006 of the Public Disclosure Document. Your letter to me of June 12, 2006 confirmed to me that I was registered on your mailing list for newsletters and project materials. I also did not receive notification through you on the deadlines for the input to the Proposed Terms of Reference. Please confirm my correct postal code as T1S 2E8 (not 3E8).

I look forward to confirmation of my input, and continued participation in the public process.

Regards **Greg McGlone** 6 Cameron Close Okotoks Alberta T1S 2E8

Del Rokosh 309485 Alberta Inc. 101 Rocky Vista Circle NW Calgary, Ab. T3G 5B7

September 8, 2006

Director, Environmental Assessment Northern Region Alberta Environment 111 Twin Atria Bldg., 4999 - 98 Avenue Edmonton, Ab. T6B 2X3

Re: Coal Valley Mining Expansion & Coal Lease 1394080001

Dear Sir / Ms.

I have not yet received a requested copy of the Coal Valley Resources Inc. Coal Valley Mining Expansion as of this date. Considering the deadline for written comments is September 15, 2006, I wish to submit the following comments and concerns in order to meet that deadline. I apologize for the late date, but had hoped to receive the documents by the weekend.

Without the Public Disclosure Documents, I am unable to comment on specifics, but wish to express my concerns regarding the millions of tons of easily accessible coal in Lease 1394080001, immediately adjacent to Luscar's leases.

In 1982, Manalta Coal Ltd. Submitted an application for a Coal Mine named the Mercoal Coal project in the name of Mercoal Minerals Ltd. This mine was approved under certain conditions as found in the ERCB Decision Report of April, 1983. Included in this Report was the requirement by the ERCB that Manalta enter into agreements with third party leaseholders in the direct mine area. This was done with Amelia Spanach, but there have been no discussions or agreements with either Manalta or Luscar and ourselves regarding our leasehold area.

Our own calculations for coal reserves in our lease indicate slightly over 10 million tons, and Manalta, admittedly using early drill hole and underground mine data, had calculated closer to 15 million tons of raw coal in place. These figures were based on surface mining methods, equipment and preparation plant technology used in the early 1980's. There has been a drastic improvement in Canadian coal mining since then. In addition, reserves were only calculated to a depth of 100 meters for the Mynheer seam and 50 meters for the Silkstone seam. Making an educated guess regarding the influence of the Mercoal Townsite as well as other properties, pipelines and so forth, we had estimated approximately 7 millions tons of clean coal. Modern equipment and mining procedures would increase the raw coal tonnages , and correspondingly, the amount recovered,

considerably.

I would think that Luscar would have included this coal in their mine planning, as it outcrops on our lease and would be quite economical to recover. Manalta referenced the coal reserves in their original Mine Plan, and I would have expected that Luscar would have done the same, as it is simply a continuation of seams they propose to mine.

Regarding the townsite of Mercoal, I believe there are only seasonal residents, and very few of those. There are some acreages in the area, but I am not aware if these properties could be affected. I will have a better idea once the Public Disclosure Documents are received, but I would imagine that Luscar could enter into discussions with relevant property holders in order to recover even more reserves.

The Public Notice I received states that Alberta will be the Lead Party for the cooperative assessment, and it is hoped that you will strongly encourage Luscar to include this coal in their reserves and mine plan. Our lease is long and narrow, and if not included and mined by Luscar, recovering this coal would be uneconomical. Mining it now simply makes sense. We would be quite receptive to any reasonable offer Luscar would make in order to include these reserves in their mine.

Without further and more detailed information contained in the Terms of reference and the Public Disclosure Documents, I am unable to make any further comments or submit any opinions or questions. If possible and if necessary, I might have further submissions to your Department once I receive the above mentioned information.

Thank you for your consideration in this matter.

Sincerely,

Del Rokosh 390485 Alberta Inc.

## Mel e Daneluk

From:

Del [ddrokosh@telus.net]

Sent:

Thursday, September 14, 2006 9:07 PM

To:

Ron Swaren; Jim Lehtinen; environmental.assessment@gov.ab.ca

Subject: Luscar / Coal Valley Resources Mine Proposal

Dear Sir / Ms.

It is Thursday, September 14, 2006, 8:45 PM, and I have still not received the Public DIsclosure Documents from Coal Valley Resources or their agent. With Friday, Sept. 15, 2006 being the declared deadline for submission of comments, I am sending this e-mail

I had sincerely hoped to receive these documents earlier this week in order to have a chance to review them and submit more educated and informed comments. Also, having something less than absolute and complete faith in our postal system, I am sending the attached document which is the letter I sent to you last week.

I am very disappointed that I was unable to review Luscars documents, and look forward to receiving them soon. If it is possible, I would like to be able to submit comments on their Reports once I have had the opportunity to review them. I would also be quite interested in receiving copies of, or being able to review any comments made by the public in this matter. Is there any possibility that comments of others would be available on the internet, located on a website?

Thank you for your consideration.

Del Rokosh 309485 Alberta Inc. Calgary Del Rokosh Trycoal Resources 101 Rocky Vista Circle NW Calgary, Ab. T3G 5B7

August 28, 2006

Equus Consulting Group 250-9707 110 St. NW Edmonton, Ab. T5K 9Z9

Enclosed please find the Document Request Form you have provided regarding Coal Valley Resources reports.

The original was sent to me by Mr. Swaren who filled it in, then realized he would be working away from home when it arrived. I have made the appropriate necessary changes to the name and address.

Thanks for your consideration, and I look forward to receiving these reports in the near future.

Sincerely

Del Rokosh

Del Rokosh 309485 Alberta Inc. 101 Rocky Vista Circle NW Calgary, Ab. T3G 5B7

October 12, 2006

Director, Environmental Assessment Northern Region Alberta Environment 111 Twin Atria Bldg. 4999 – 98 Avenue Edmonton, Ab. T6B 2X3

RE: Luscar / Coal Valley Mining - Mercoal area

Dear Sir:

I am contacting you in response to a request by your department for comments on the documents provided by Luscar regarding their coal mining expansion requirements in the Mercoal area.

I have reviewed the Environmental Impact Assessment and, as expected, can find no faults or omissions. None was expected. Luscar and Coal Valley Mining are professionals and specialists. They are good at what they do.

On the other hand, I do have some comments, observations and a question or two with reference to their Public Disclosure Document and the Additional Information that was provided.

Our lease, #1394080001, was acquired in 1979, within days of an application by Mercoal for virtually the same areas. I am sure there was wailing and gnashing of teeth when it was discovered that someone else had gotten to this lease first.

We acquired this property as an investment in our province and because it is is a prime piece of coal real estate. I was in the coal industry at the time, working for Consol, based in Red Deer, and was well aware of the potential value of this lease. We are yet again making it available to Luscar / Coal Valley Mining, supported by the following.

The coal reserves in this area are well proven, based not only on Manalta and Luscar drilling, but also on figures obtained from a detailed map of the underground work just east of our lease. There is a lot of coal there. A large, multi-volume report obtained from Manalta years ago mentioned figures of 25 million tons in place on our lease, with estimates of 15 million tons recoverable at the time. These are Manalta figures, not mine. An assessment done for us separately gives estimates somewhat lower, but still substantial, at 15 million plus tons with over 7 million tons recoverable. With today's mining methods and equipment, I would expect Coal Valley Mines would be able to exceed that figure appreciably.

12 Od 06 11:36p Del Rokosh

Surface contours in this area are relatively gentle and the coal outcrops on our lease. This is ideal for dragline operations as well as straightforward reclamation. Should CVM acquire this property, it would automatically be included in the Mercoal West operation. The coal on our lease would have the lowest costs, being on outcrop and closest to the prep plant. With structures and geology being continuous and contiguous, mining our lease reserves would simply be an extension of the presently proposed Mercoal West operation. It is also closer to their prep plant, providing a lower haulage cost per ton. It would also enable CVM to extract all the coal on their present lease, reducing average cost per ton even further.

Lease maps indicate that our lease is virtually surrounded by Luscar leases. It seems to me that it would make sense to amalgamate all leases, making life simpler for future mine plans.

With today's coal prices, there could be something in the range of a billion dollars worth of good coal that CVM could access. I am not privy to CVM customer information, but that would be an awful lot of foreign income, and a substantial boost for Alberta royalties. We are all aware that the public is starting to become more aware of the royalty returns from the oilpatch, and mining this lease would be financially rewarding for all concerned.

## **OUESTIONS**

- 1. A number of years ago, Manalta applied for a coal mine in this area. One of the requirements for a successful mine application, so I understand, was that Manalta had to enter into agreements with ourselves and Mrs. Spanach. Since Luscar assimilated Mercoal, I assume they would have retained some of their files. Would it be possible or feasible to obtain a copy of these agreements?
- 2. The "Yellowhead Tower" area is almost continuous except for a small gap left for Coalspur. Is there a reason for the much larger gap at Morcoal? It seems that there is an awful lot of coal that is being ignored.
- Is there a time frame for a Phase 3?
- 4. The maps included in these reports are of a very small scale. Are there or will there be maps of a larger scale available?

There are numerous advantages to support the idea of Coal Valley Mines acquiring Coal Lease # 1394080001. It would seem to be a win – win situation for all parties, including Coal Valley Mines, ourselves, the Province of Alberta. I respectfully request that Coal Valley Mines be encouraged to acquire our lease and take advantage of a substantial amount of coal.

Thank you for your consideration and I look forward to your reply.

Del Rokosh

309485 Alberta Inc.



September 1, 2006

**ALBERTA** 

Director.

FISH &

Environmental Assessment,

Northern Region, Alberta Environment

**GAME** 

111 Twin Atria Building.

4999-98 Avenue Edmonton, AB T6B 2X3

**ASSOCIATION** 

Re: Coal Valley mining Expansion

To Whom It May Concern:

Our major concern is the large area that would be closed down access to hunting & fishing in the area. In the past Coal Valley Resources and Luscar/Gregg River Coal was open for access beyond the mine site and access through the mine site with marked access trails. We enjoyed good rapport and dealt with the issues and came to satisfactory results. We do not expect to travel or hunt where mining is in progress. but alternate routes going around the mine site would be satisfactory.

6924 - 104 St. NW

Edmonton, Alberta

Canada

T6H 2L7

We have a problem with Elk Valley Coal when in the planning and exploration, we were promised a designated trail for ATV's or a alternate routes which has not happen for the past three hunting seasons. There is a designated trail, which is in the access management plan, from Mountain park to the Drummond range through the white horse Wildland park for ATV's. As for Coal Valley Resources a yearly access meeting prior to hunting season I'm sure we could work out a access plan, and work together to a satisfactory plan.

Yours truly,

Steve Witiuk

Alberta Fish & Game Association Representative

WE for Steve Which

Phone:

(780) 437-2342

Cc:

Randy Collins, President, AFGA Les LaFleur, Coal Valley Resources

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