

DOCKET NUMBER

PROPOSED RULE

PR-19,20,21 et al

(50 FR 13797)

(18)

VIRGINIA IRON, COAL AND COKE COMPANY

SUBSIDIARY OF ANR COAL COMPANY

P.O. DRAWER C, COEBURN, VIRGINIA 24230

Telephone 703 395 3316

'85 JUL -3 AIO:20



OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

July 1, 1985

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir:

As a member of the coal community, I must file a formal protest regarding the rules proposed in Part 39 of 10 Code of Federal Regulations regarding drill hole geophysical logging. At the present time, high resolution gamma density borehole logs are probably the most definitive and sophisticated geophysical parameter available to the coal industry. This method of borehole "mapping" is an intricate part of our exploration program and needs to remain available as an exploration tool.

We would like to suggest that rules and regulations for coal logging be drafted separate from those proposed for oil and gas since both types maintain large variations in method and source. It is also hoped that the Nuclear Regulatory Commission will not prohibit open hole logging as this procedure provides an accurate, high resolution log at minimum cost. However, we urge that safety guidelines for the open-hole use of logging tools be adopted in order to protect surrounding residents and the environment.

We sincerely appreciate your prompt attention in this matter.

Very Truly Yours,

John C. Lydzinski

John C. Lydzinski, C.P.G.S.
Chief Geologist

/slp

8507080249 850701
PDR PR
19 50FR13797 PDR

DS1010
add: Anthony M. Tse
113055

EXECUTIVE OFFICES, P. O. BOX 1871, ROANOKE, VIRGINIA 24008 (703) 342-1801

Acknowledged by card JUL - 3 1985