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Rosemary L. Klein
Assistant General Counsel

August 22, 2016

VIA OVERNIGHT DELIVERY

The Honorable Brent J. Fields
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

**RE: SEC Proposed Rule for Modernization of Property Disclosure
Requirements for Mining Registrants**

Dear Mr. Fields:

Arch Coal, Inc. ("Arch") respectfully requests a 60-day extension of the comment period for the Securities and Exchange Commission's (SEC) proposed rule to modernize property disclosure requirements for mining registrants. Arch will be directly impacted by the proposed revisions, and the complexity of the proposed rule requires additional time for review in order that we may provide comments necessary to ensure workable and effective change.

The proposed revisions deviate considerably from the existing SEC Industry Guide 7 that has worked well for Arch for many years. The onus brought about by the proposed rule, and the potential liability placed on a single individual in the capacity of a Qualified Person, are a couple of concerns Arch has with the proposed rule. The proposal includes many new concepts and requirements that merit further evaluation and require an extension of time to provide proper evaluation and feedback.

I understand other industry participants have similar concerns and are also seeking an extension of the comment period and, accordingly, your consideration of this request is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "RL 2 RK".

Rosemary L. Klein
Assistant General Counsel

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