



**TO:** Brent J. Field  
Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20459-1090

**FROM:** Bill Bissett, President   
Kentucky Coal Association

**DATE:** August 26, 2016

**SUBJECT:** **KCA COMMENTS REGARDING SEC'S PROPOSED RULES TO MODERNIZE  
PROPERTY DISCLOSURES FOR MINING REGISTRANTS**

My name is Bill Bissett and I serve as the President of the Kentucky Coal Association (KCA). Please accept these comments as our input related to the United States Securities and Exchange Commission's proposed rules to modernize disclosures for mining registrants, also known as *S7-10-16 Modernization of Property Disclosures for Mining Registrants*.

KCA is a trade association of more than 115 members and associate members throughout Kentucky that represents every aspect of Kentucky's coal mining industry, including coal production, equipment manufacturing and supply, electric power generation, engineering, coal transportation, blasting and other similar enterprises. KCA's members play an active and critical role in America's affordable, domestic energy market.

As you may be aware, Kentucky's coal industry has faced a precipitous decline in coal production and employment in recent years. In our Eastern Kentucky coalfield, which is part of the Appalachian Coal Basin, we have witnessed production decline from 91 million tons in 2008 to an expected production of this year of 18 million tons. As our production has declined, employment has also plummeted in this same timeframe from more than 14,000 direct workers in 2008 to less than 4,000 direct workers today. Please know that for every one direct coalmining job lost, Kentucky loses at least three other

Alden Resources, LLC ▲ Alliance Coal, LLC ▲ Armstrong Coal Company, Inc. ▲ Blackhawk Mining, LLC ▲ Booth Energy  
Hazard Coal Corporation ▲ Jamieson Construction Company ▲ Locust Grove, Inc. ▲ MountainSide Coal Co., Inc.  
Murray Energy/KenAmerican Resources ▲ Nally & Hamilton Enterprises ▲ Rhino Energy, LLC ▲ Western Kentucky Minerals, Inc.

indirect livelihoods as well as a countless number of induced jobs as well. As coalmining is the primary economic driver in Eastern Kentucky, the economic downturn has been systemic and well documented. Additional information about decline can be found at [http://energy.ky.gov/Coal%20Facts%20Library/Kentucky%20Quarterly%20Coal%20Report%20\(Q2-2016\).pdf](http://energy.ky.gov/Coal%20Facts%20Library/Kentucky%20Quarterly%20Coal%20Report%20(Q2-2016).pdf).

KCA agrees with both the National Mining Association (NMA) and Natural Resources Partners (NRP) in opposing these proposed rules as they deviate substantially from existing and sufficient requirements and will create an enormous and costly burden on many KCA member companies. KCA also joins NMA, NRP, and other key stakeholders in requesting an extension of the public comment period of at least sixty (60) days. The proposal is nearly 300 pages in length, and requires consideration of hundreds of unique issues in order to appropriately formulate comments. Given the sheer volume of issues under consideration, KCA's member companies and other key stakeholders will be deprived of a meaningful opportunity to participate in the rule-making process unless additional time for review and comment is provided.

If you have any questions regarding these comments, please contact me. Thank you in advance for your consideration of these comments and I hope you will either reconsider these rules or at a minimum provide more time for stakeholders to examine and comment upon them.

Sincerely,

A handwritten signature in black ink that reads "Bill Bissett". The signature is written in a cursive style with a long horizontal line extending to the right from the end of the name.

Bill Bissett, President  
Kentucky Coal Association