

1 October of 1991 and the process that followed the
2 submission of that plan.

3 The evidence is that in early October Gerald
4 Phillips submitted a plan that significantly differed
5 from the approved plan. And the submission triggered a
6 searching re-analysis in the Department of Resources of
7 Westray's mine planning.

8 On the 20th of November, Don Jones produced a highly
9 critical assessment. Westray had made revisions to its
10 main tunnels without fully realizing the implications of
11 those changes. The company had rushed into the Southwest
12 block to get coal early and changed the original
13 alignment of the section, probably exacerbating its
14 ground control problems. It proposed penetrating the
15 barrier pillar to the Allan Mine without doing any
16 geotechnical work. It realigned other mining blocks
17 without providing justification. It changed the mine
18 design under the Trans Canada Highway, possibly
19 increasing the danger of subsidence. And it failed to
20 show depillaring operations were to be conducted without
21 endangering the safety of miners.

22 You remember now that Mr. Jones' analysis was
23 endorsed by his superior, Pat Phelan, and Mr. Phelan
24 passed on the Jones' critique to his Deputy Minister and
25 added his own assessment: Westray was clearly in