

1 ceiling. And we'll elaborate on that in our written
2 submissions to you.

3 Further, Mr. Commissioner, there's been no credible
4 evidence that challenges the expert testimony of Reg
5 Brookes or Malcolm McPherson about propagation of the
6 explosion once the methane fire was ignited. The fire
7 travelled along the roof until there was a methane
8 explosion which triggered a coal dust explosion. We
9 submit you should find that conditions were right for the
10 layering of methane gas in the roadways leading to the
11 working faces of the Southwest section in the hours
12 preceding the explosion.

13 The expert evidence of Dr. McPherson and Westray's
14 own ventilation surveys shows that the ventilation at the
15 face of these headings could not prevent the layering of
16 gas produced there. And it's also likely that the gas
17 leaking from the Southwest 1 section was also layering
18 and was being drawn to the headings. This process would
19 have been increased by the steady drop in the barometric
20 pressure that had occurred in the 72 hours preceding the
21 explosion.

22 Mr. Commissioner, the United Steelworkers of America
23 has a deep interest in the recommendations for regulatory
24 reform which will form part of your report. And we
25 intend to make detailed proposals in our written