EXHIBIT 91

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December 6, 2012

Via E-Mail

Elliot Moskowitz, Esq. Davis Polk & Wardwell 450 Lexington Avenue New York, NY 10017

Re: In re Patriot Coal Company, Bankr. E.D. Mo. (Surratt-States)

Dear Elliot:

We write on behalf of the UMWA 1974 Pension Trust, the UMWA 1993 Benefit Plan, the UMWA 1992 Benefit Plan, and the UMWA Combined Benefit Fund (collectively, the "UMWA Funds") to request certain information concerning Patriot Coal Corporation ("Patriot"). We understand that Patriot has prepared a business plan to address its benefit and pension obligations, and that Patriot plans to meet with the UMWA to discuss and negotiate the terms of the business plan. To prepare for negotiations, Patriot and the UMWA have already executed a Stipulated Protective Order Under 11 U.S.C. §§ 1113(d)(3) and 1114(k)(3) [Docket No. 1040]. As stated in the UMWA Funds' letter of November 8, 2012, requesting a form of the Stipulated Protective Order, one or more of the Funds may participate in the negotiations and/or litigation under Sections 1113 and 1114. In order to participate effectively, the Funds need certain information concerning Patriot's business operations as soon as possible.

Accordingly, the UMWA Funds request the documents and information below. Please note that these requests seek third-party and internally generated information, and include electronic communications. Also, when a request references "Patriot," we intend to refer to (i) the corporate entity Patriot Coal Corporation, (ii) each of its subsidiaries (including its subsidiaries that are debtors or debtors-in-possession in the above-referenced Chapter 11 cases as well as any of its non-debtor subsidiaries), (iii) any and all business segments, and (iv) any and all responsive documents and information that Patriot has or had in its possession, custody, or control from, to, or prepared by or for Peabody Energy Corporation ("Peabody"), Arch Coal, Inc. ("Arch"), and/or members of their controlled groups.



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Requests for Documents

Please provide the documents requested below.

- 1. The pleadings for each litigation or enforcement matter that is identified in Patriot's bankruptcy schedules and pending in state court and state and federal agencies.
- 2. Documents, as of each Patriot year-end from 2007 to the present, containing information, documentation, quantification, and/or analysis of selenium and Patriot's other environmental liabilities and environmental litigation in which it is a party. This request includes but is not limited to remediation reports and plans, cost quantifications, and assessments of any selenium remediation technology¹ considered or implemented, along with documentation of the analysis and quantification of, and factors influential in, assessing, selecting, rejecting, or changing such technology.
- 3. Documents, from 2005 to the present, containing or referring to analysis of the business risks of increased natural gas development and/or hydraulic fracturing and the potential impact on coal prices, including but not limited to natural gas development in the Marcellus Shale.
- 4. Documents, from 2007 through the present, containing information, analysis, or quantification of Patriot's asset retirement obligations.²
- 5. Documents, from 2002 through the present, containing information, analysis, or quantification of Patriot's post-retirement obligations, including but not limited to:
 - a. documents relating to the obligations and liabilities of Patriot to or under each of the UMWA Funds, as well as the UMWA Cash Deferred Savings Plan, and the Retiree Bonus Account Plan;
 - b. documents relating to continued participation by Patriot in the 1974 Pension Plan or withdrawal from the 1974 Pension Plan;
 - c. documents relating to the cost of providing health benefits to Patriot's Coal Act covered retirees (and their dependents) and non-Coal Act covered retirees in individual employer benefit plans, and documents relating to whether to continue or discontinue providing such benefits;
 - d. documents relating to the total number of beneficiaries attributable to Patriot in the UMWA Funds, the UMWA Cash Deferred Savings Plan, the Retiree Bonus

¹ Selenium remediation technology includes but is not limited to Patriot's use of Zero Valent Iron, Fluidized Bed Reactor, and Advanced Biological Metals Removal systems.

² As used herein, "asset retirement obligations" means costs related to future disposal of assets.



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Account Plan, and individual employer health benefits plans (separately for Coal Act and non-Coal Act beneficiaries); and

- e. documents to or from the UMWA Funds relating to post-retirement obligations.
- 6. Documents, from 2005 through the present, containing information, analysis, or quantification of Patriot's workers' compensation obligations.
- 7. Documents, from 2007 through the present, containing information, analysis, or quantification of below-market sales contracts acquired by Patriot.
- 8. Engineering reports for Patriot's reserves estimations, mining plans, pre-mining environmental assessments (including but not limited to those for selenium issues), such as regulatory filings, reports containing reclamation costs, or any other similar reports or environmental assessments.
- 9. Documents containing historical breakdowns, from 2003 through the present, of:
 - a. Patriot's sale of metallurgical and thermal coal (by BTU content per ton);
 - b. Patriot's sale of metallurgical and thermal coal (by contracted pricing per ton);³ and/or
 - c. spot pricing, organized by mine.
- 10. Documents, from 2007 to the present, containing the total budget for each mine and forecasted amounts to be sold (in tons) for metallurgical and thermal coal (by BTU content per ton) through contracted pricing and spot pricing, costs, and capital, organized by mine.
- 11. Documents, containing or referring to the research and information upon which Patriot management bases its judgments for expected metallurgical and thermal coal prices (organized by BTU content per ton, region, and mine).
- 12. Documents for each of Patriot's legal entities, complexes, and mines that identify the primary business purposes and contain historical financial statements, including but not limited to balance sheets and income statements.
- 13. Documents and reports, from 2002 to the present, including but not limited to historical detailed operating reports, organized by mine (including mines that may be idled due to economic slowdown or environmental issues) and including the following information:

³ This includes but is not limited to contracted pricing that is supplied from agreements with Peabody Energy Corporation, Arch Coal, Inc., or customers, or from intercompany sales.



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- a. revenue by coal type;
- b. related revenue streams, including non-coal revenue;
- c. intercompany versus customer revenue;
- d. a breakdown of labor (employee and independent contract) costs, including compensation and retirement, health, and welfare benefits, and other fixed and variable costs, consistent with the operations at each mine; and
- e. expected useful life and permitted operating period of each mine or operation.

For this request, any allocated selling, general, and administrative expenses ("SG&A") or other corporate overheads should be identified as such.

- 14. Documents, from 2007 to the present, identifying tons sold to Peabody and to all other customers, and the price per ton for each year.
- 15. Leases for coal reserves, fixed assets, and equipment at currently operating, closed, and idled Patriot mines and complexes, and the leases or royalties for any such mines, from 2007 through the present.
- 16. Customer contracts for which Patriot may be at risk of incurring higher costs in order to meet contracted quality standards, including but not limited to BTU levels, impurities, and sulfur content.
- 17. Documents, from 2006 through 2008, showing obligations of Patriot that were not paid current, including but not limited to trade accounts payable and Patriot's accounts payable aging at each month-end.
- 18. Documents, from 2007 through the present, containing or referring to future projections of the financial position, business operations, or solvency of Patriot.
- 19. Any and all notes from Patriot's investor relations department that were created within three months of each of Patriot's transactions, from 2007 to the present.
- 20. Any and all documents containing analysis of or referring to contingent liabilities, recorded or unrecorded, in Patriot's financial statements at each quarter and year-end, from 2007 through the present. For this request, all off-balance sheet items should be detailed.



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Requests for Information

In addition to the documents requested above, we would appreciate answers to the questions below. If documents exist that are sufficient to respond to any of these questions, please indicate that in your response and provide those documents.

- 1. Identify each Patriot mine and the particular Patriot entity owning and/or operating that mine, as of Patriot's bankruptcy petition date.
- 2. Identify the method or mechanism that Patriot currently uses to determine spot pricing at the time of sale.
- 3. Provide a breakdown of employee counts (union versus non-union), organized by mine, from 2007 to the present.
- 4. Identify, by mine (including mines that may be idled due to economic slowdown or environmental issues), the estimation of costs, including but not limited to costs of remediation efforts and costs to remove equipment and/or to cease operations, according to Patriot management as of today.
- 5. Identify, by mine (including mines that may be idled due to economic slowdown or environmental issues), the expected useful life and permitted operating period, according to Patriot management as of today.
- 6. Identify, by idled mine, the expectation of revenues and costs for resuming operation, and what criteria is used to restart the mine, according to Patriot management as of today.
- 7. At each year-end, from 2007 to the present, identify Patriot management's estimation of fair market value, by mine and Patriot legal entity owning the mine.

Thank you in advance for your prompt responses. Please do not hesitate to contact me with any questions or concerns.

John C. Goodchild, III

Very truly yours,

cc: Paul A. Green, Esq.

Edward L. Dowd, Jr., Esq. James E. Crowe, III, Esq.