



**DEPARTMENT OF THE INTERIOR**  
**TASKING PROFILE**

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**To (Recipient):** Jewell, Sally

**From (Author):** MacIntyre, Bruce

**Subject Text:** Billings Chamber of Commerce seeks 60 day comment period extension re: ONRR Oil, Gas, and Coal reform

**Req. Surnames:**

**Mail Carrier:**

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**Copies To:** SIO-OES

**Status Tracking:** 01/30/2015 11:00:30 AM - Daniel Vaught : See ESO 60721. Have packages travel together.

**Correspondence Specialist and Phone:** SIO-OES-Daniel Vaught/202-208-6540

**Closed**  
**Comments:**

**Signed:**

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January 19, 2015

The Honorable Sally Jewell  
Secretary  
Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

Subject: Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform (ONRR-2012-0004 (1012-AA13))

Dear Secretary Jewell:

The Billings Chamber of Commerce requests that the Department of the Interior provide a 60-day extension of the comment period for the "Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform." The complexity of this proposed rule requires additional time to review the possible implications of the change and provide informed comments to the Department to help develop a sensible policy for federal lessees, buyers of oil, gas, and coal, taxpayers, and others impacted by such a change.

The Billings Chamber of Commerce continues to monitor federal energy resources and we believe that the draft rule is very complicated and in need of extensive comment and revision. For example, the proposed rule would assess royalties on revenues earned by a logistics services business with its own cost structure, risks and potential profits (which are already subject to income taxes) rather than the commodity to which the royalty applies by law, and would create new, complex and burdensome administrative systems, not only for coal, oil and gas, but for any industry subject to federal regulation.

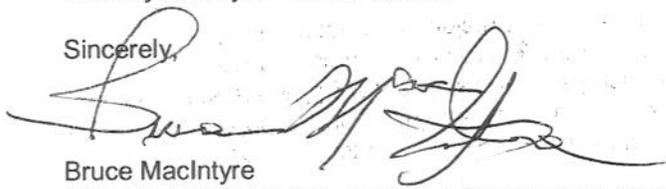
We are concerned that the likely outcome from this rule will be diminished sales of federal energy resources and diminished revenues for state and federal entities that may impact member businesses which we represent. The draft rule also has broader negative implications for the energy and other sectors that need to be fully evaluated before final comments can be provided.

The current rules and regulations for leasing and producing federally-owned coal have created substantial revenues for federal and state governments, including an estimated \$876 million from royalties in fiscal year 2012 alone. As the ONRR's charge is "to collect, disburse, and verify Federal and Indian energy and other natural resource revenues on behalf of all Americans," the Office should be mindful not to discourage investment in federal resources through a rulemaking dramatically changing how royalty is calculated, leading to reduced revenues to fund needed federal and state priorities.

For these reasons, we ask that you provide a 60-day extension of the comment period for the proposed "Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform."

Thank you for your consideration.

Sincerely,



Bruce MacIntyre  
Director, Business Advocacy and Government Affairs

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Billings

OFFICE OF THE  
Executive Secretary  
Chamber of Commerce





P.O. Box 31177  
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The Honorable Sally Jewell  
Secretary  
Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

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