

*Board of Commissioners
Converse County, Wyoming*

107 No. 5th St., Suite 114 • Douglas, WY 82633-2448 • 307-358-2244 • Fax 307-358-5998
Rick Grant, Chair • Robert Sharp, Vice-Chair • Mike Colling • Tony Lehnert • Jim Willox

751193
February 3, 2015

2015 FEB -9 AM 11:07

RECEIVED
OFFICE OF THE
EXECUTIVE SECRETARIAT

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:

We write to request 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 Converse County Commissioners believe 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.

Converse County is a mineral county and has a significant interest in federal energy resources. The draft rule needs to be carefully reviewed. We are concerned that the outcome from this rule will be diminished sales of federal energy resources and diminished revenues for our county and state. 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 attention to this matter of significant importance.

Respectfully yours,



Richard C. Grant, Jr., Chairman