PUBLIC SUBMISSION

As of: 4/9/15 6:39 PM
Received: April 09, 2015
Status: Posted
Posted: April 09, 2015
Tracking No. 1jz-8i79-eh76
Comments Due: May 08, 2015
Submission Type: Web

Docket: ONRR-2012-0004
Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform RIN 1012-AA13

Comment On: ONRR-2012-0004-0024
Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform

Document: ONRR-2012-0004-0086
Comment from Julie Erisman,

Submitter Information

Name: Julie Erisman

General Comment

1. Creates significant uncertainty;
2. Gives the Secretary of the Interior too much power;
3. Punishes miners that sell to small industrial customers and export coal, and hurts coal cooperatives and captive mine power plants
4. Discourages federal lands energy production
5. Needs more study and review

The current royalty valuation guidelines provide significant benefit to taxpayers and certainty for producers and have worked well since 1989. In fact, in 2014, coal producers in Wyoming and Montana paid over $600 million in federal royalties alone, half of which are disbursed back to the states for education and infrastructure. Today, over 30% of the price per ton of coal is tax, not including income taxes. If the proposed rule is put in place, it will likely diminish coal production, in turn cutting these important federal and state revenues and hurting the economy. This new rule is yet another attempt by the Administration to keep the coal in the ground. Tell the Administration that long-standing rules governing royalty valuation should stay the same and the proposed rule is the wrong way to go.

DON'T CHANGE IT!!!!!!!!!!!!!!!!!!!!!!!