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OFFICE OF THE EXECUTIVE SECRETARIAT

February 12, 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:

I am writing 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 complexity of this proposed rule requires additional time to review the potential implications of the change and provide informed comments to the Department to help develop a meaningful policy for federal lessees, buyers of oil, gas, and coal, taxpayers, and others impacted by the proposed changes.

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, I 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 most important matter.

Sincerely,

Vista West Engineering, Inc.  
Joyce L. Schmidt  
Business Manager