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April 14, 2017

Office of Natural Resources Revenue
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Received
Lakewood, Colorado

ATTN: Armand Southall
Office of Natural Resources Revenue Building
Denver Federal Center
West 6th Ave. and Kipling Street
Denver CO 80225

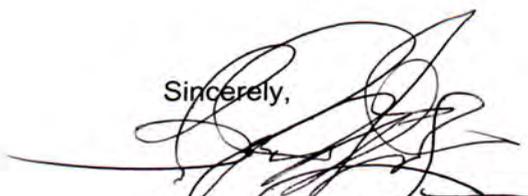
Re: Regulation Identifier Number 1012 – AA20; Repeal of Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform

Dear Mr. Southall,

The Billings Chamber of Commerce on behalf of our 1200 member businesses understands the fiscal impact in Billings both directly and indirectly. The development of these resources not only provide critical revenues to the counties in eastern Montana but are also a source of good paying jobs. In Billings, we see both the primary and secondary impact of the extractive resources industry as goods and services are purchased from our Billings businesses by the companies in this industry as well as by the employees of those companies.

We write to express our support for the repeal of RIN 1012 – AA20. The rule was poorly conceived and undoubtedly would have negatively impacted the development of natural resources, particularly coal, in the State of Montana. Repealing the rule and reverting to the decades old approach of valuing coal will provide certainty and clarity in the royalty process. Unless repealed, the rule will result in confusion and disputes over the development of federal coal resources.

Sincerely,



Bruce MacIntyre
Senior Public Policy Advisor

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