

# PUBLIC SUBMISSION

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**Docket:** ONRR-2017-0001

Repeal of Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform

**Comment On:** ONRR-2017-0001-0001

Repeal of Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform

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Hesid Brandow,

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## Submitter Information

**Name:** Hesid Brandow

**Address:** 82801

**Email:** hesidb@gmail.com

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## General Comment

It is essential, if a representative democracy is to function well, that the people be the focus of representatives. When corporate interests overshadow the benefit of the human beings who are served, there is a major problem. Loopholes that allow coal companies to avoid paying royalties harm the people and only benefit the industry. As an energy state, we must protect the rights of the individuals who live here. Energy extraction is only worthwhile so long as the people benefit. The coal, after all, belongs to the tax payers of Wyoming.

I'm writing to support the regulations passed by ONRR that reformed royalty valuation on taxpayer-owned coal. ONRR did the right thing by closing the gaping loopholes that allowed coal companies to dodge royalty payments owed to American taxpayers, and ensuring that companies pay their fair share. Instead of paying royalties based on non-arms-length transactions to subsidiaries, royalties should be calculated off arm's-length sales, capturing what this coal is actually worth. ONRR's rules should reflect the true value of publicly-owned coal and ensure fair value to taxpayers. Keep the loopholes closed.