

STATE and TRIBAL ROYALTY AUDIT COMMITTEE

State of Alaska • Blackfeet Nation • State of California • State of Colorado • State of Montana • Navajo Nation • State of New Mexico
State of North Dakota • State of Oklahoma • Shoshone & Arapaho Tribes • Southern Ute Indian Tribe • State of Texas
• State of Utah • Ute Indian Tribe • Ute Mountain Ute Tribe • State of Wyoming

Luke Decker, *Chair* (512) 463-6907
Dawn Hirman, *1st Vice Chair* (970) 563-5561
Ryan Nichols, *2nd Vice Chair* (916) 445-4804

February 9, 2015

Gregory Gould
Director
Office of Natural Resources Revenue
U.S. Department of the Interior
1849 C Street NW, MS 4230
Washington, D.C. 20240

Re: Proposed Consolidated Valuation Rules (RIN 1012-AA13)

Dear Mr. Gould:

On January 6, 2015, the Office of Natural Resource Revenue (ONRR) published a proposed valuation rule for Federal Oil & Gas and Federal & Indian coal valuation with the deadline to comment on March 9, 2015. On behalf of the State and Tribal Royalty Audit Committee (STRAC), we request an extension of 90 days. If our proposed comment date of June 9, 2015 is approved, the additional time would greatly benefit our ability to provide comprehensive feedback and comments.

The rule changes will have an enormous impact on States' and Tribes' royalty revenue collections going forward. STRAC believes in order to provide comprehensive feedback (whether supportive, disagreeable, or in some cases issues that were not addressed) we will need additional time to put these ideas together.

Moreover, this is something STRAC would also like to discuss with its members at the next STRAC only meeting. The 60 day window will end in March, two months prior to the next STRAC meeting. Currently, most delegations are focused on completing next year's work plan which is due on April 1.

If you have any questions, please feel free to call me at (512) 463-6907.

Sincerely,


Chairperson, STRAC