

PUBLIC SUBMISSION

As of: 4/20/15 11:59 AM
Received: April 17, 2015
Status: Posted
Posted: April 20, 2015
Tracking No. 1jz-8icf-9346
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-2012-0004-0110

Comment from Denise Tugman,

Submitter Information

Name: Denise Tugman

General Comment

The long-standing rules governing royalty valuation should stay the same. The proposed rule is the wrong way to go as it creates significant uncertainty; gives the Secretary of the Interior too much power; punishes miners that sell to small industrial customers and export coal, and hurts coal cooperatives and captive mine power plants; discourages energy production on federal lands; and needs more study and review.

For example, in 2014, coal producers in Wyoming and Montana paid over \$600 million in federal royalties alone, half of which were disbursed back to the states for education and infrastructure. I believe the proposed rule would likely diminish coal production and in turn reduce these important federal and state revenues and hurt the economy.