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

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Comment from Mark Gilbertson,

Submitter Information

Name: Mark Gilbertson

General Comment

I am strongly opposed to this rule. If implemented, this rule could severely hamper business integration, which would inevitably lead to third-party ownership, likely foreign, of the downstream businesses that currently engage in value-adding processes. Paying a royalty on every part of the process is taxation that renders the business unprofitable.