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

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General Comment

My view is that the long-standing rules governing royalty valuation should stay the same and the proposed rule is the wrong way to go by the following reasons:

The Proposed Rule

1. Creates significant uncertainty;
2. Gives the Secretary of the Interior too much power;
3. Punishes miners that sell to small industrial customers and export coal, and hurts coal cooperatives and captive mine power plants
4. Discourages federal lands energy production
5. Needs more study and review

Please keep the current long-standing rules in place.

Thank you.