

# PUBLIC SUBMISSION

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**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-2012-0004-0194

Webb Brown

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## Submitter Information

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## General Comment

May 1, 2015

Armand Southall  
Regulatory Specialist  
Office of Natural Resources Revenue  
P.O. Box 25165  
MS61030A  
Denver, CO 80225

Subject: Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform (ONRR-2012-0004 (1012-AA13))

Dear Mr. Southall:

As an organization that represents the general business community in Montana, we are concerned with the Department of Interiors recently proposed rule Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform (ONRR-2012-0004 (1012-AA13)) and agree with the concerns outlined by Cloud Peak Energy in their comments on the rule. As proposed, this rule threatens to significantly curtail responsible production of natural resources, and so we ask that the Department of Interior withdraw the rule.

The proposed rule is deeply flawed and incompatible with the Office of Natural Resource Revenues (ONRR) mission to optimize revenues from federal resources and should be withdrawn.

The new rule is a thinly veiled attempt to keep federal coal in the ground rather than to optimize revenues.

We believe this proposed rule would likely have a negative impact by reducing important royalty revenue to Montana and the Federal government. The ONRR has an important charge to execute. Appropriate development of Americas natural resources is essential for current economic growth, future prosperity, and the generation of tax revenue to fund important government services.

Thank you for hearing our concerns on this matter of critical importance to coal development in Montana.

Sincerely,

Webb Brown  
President & CEO  
Montana Chamber of Commerce  
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