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

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Submitter Information

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General Comment

Dear ONRR,

Coal companies have spent years building a vast network of hundreds of subsidiaries -556 of them in Wyoming and Montana alone- which they use to cheat the royalty system. Thats a big deal because we live in Wyoming and the vast majority of coal mined in Wyoming belongs to you and me the taxpayers of the United States and federal royalties help fund schools, highway improvements, and local infrastructure.

The coal companies sell coal to themselves at artificially low prices paying the public a deflated royalty then turn around to sell the coal at a higher profit, and pocket the difference - without paying a cent in royalties on the markup. This is scandalous! This is cheating!

Instead of paying royalties off of self-dealing, companies should pay royalties based on the true market value of coal meaning the final value of coal sold to a power plant or exporter.

Anything less denies the American public our share of the value of a resource we own and subsidizes coal mining and coal exports.

We SUPPORT the rule making of the Office of Natural Resources Revenue, a branch of the Department of Interior, that proposes to close the affiliate company loophole to ensure royalties are paid based on arms-length transactions.

Thank you for closing this loophole.