



May 4, 2017

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Comments on the Repeal of the Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform (1012-AA20)

COPAS is a professional organization comprised of the oil and gas industry's most knowledgeable and influential accounting professionals. COPAS has operated as a non-profit entity for 50 years and has over 4,000 members with 24 societies in the United States and Canada. COPAS was established in 1961 by representatives from various independent local societies throughout the U.S. and Western Canada. These societies recognized the need for standardized procedures and guidelines as the oil and gas industry expanded across the country so that common issues and problems could be addressed in a central forum. The societies have developed standardized documents in areas such as joint interest accounting, auditing, production volume and revenue accounting, and financial reporting and tax matters so that companies operating in all parts of the U.S. and Canada can effectively and efficiently use the same standards and guidelines. Additionally, many of our members are responsible for the filing of the Federal royalty reports to the ONRR.

COPAS appreciates the opportunity to comment on the Repeal of the Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform. Due to all the issues that need to be deleted, changed, and/or added back, COPAS supports ONRR's repeal of the 2017 Valuation Rule. COPAS believes the existing royalty valuation regulations can be improved, we strongly recommend they start with a new rulemaking process, with involvement and input from the newly re-established and fully engaged Royalty Policy Committee (RPC) Federal Advisory Committee.

Once again, COPAS appreciates the opportunity to comment on the Repeal of the Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform. COPAS also welcomes and encourages additional opportunities for Industry participation in drafting these valuation rules. We believe industry can provide valuable insight to ONRR on how the proposed valuation rules

will impact royalty reporting and payments. If you have any questions regarding our comments, please contact me at (918) 877- 0792.

Sincerely,

A handwritten signature in black ink, appearing to read "Trey Thee", with a long horizontal flourish extending to the right.

Trey Thee  
COPAS Revenue Committee Chairperson