

# PUBLIC SUBMISSION

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Repeal of Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform

**Comment On:** ONRR-2017-0001-0001

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

**Document:** ONRR-2017-0001-0003

Comment from Lyn Herdt,

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## Submitter Information

**Name:** Lyn Herdt

**Address:** 28451

**Email:** mlherdt@hotmail.com

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## General Comment

Here is a quote from DOI in 2016 about the rule: "The best indication of value is the gross proceeds received under an arm's-length contract between independent persons who are not affiliates and who have opposing economic interests regarding that contract. The best indicator of value under a non- arm's-length sale is the gross proceeds accruing to the lessee or its affiliate under the first arm's- length contract, less applicable allowances. In this final rule, we eliminated the benchmarks for both natural gas and coal. We implemented this method for Federal oil in 2000 and, in this final regulation, made it consistent for Federal gas and Federal and Indian coal."

The Native American people, and actually, all American people, need to understand what has changed since 2016 that makes the above statement no longer relevant and supports the proposed changes to the rule. Please explain.