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

Sub: RIN 1012-AA20 Repeal of Consolidated Federal Oil & Gas and Federal & Indian Valuation Reform

Dear Mr. Southall:

As director of the Montana Coal Council, an industry trade association representing all six Montana coal mines, I am writing today in support of ONRR's proposal to repeal the Consolidated Federal Oil and Gas and Federal & Indian Coal Valuation Reform Rule. Simply put, the adopted rule appears to be incompatible with ONRR's mission to optimize revenues from federal resources.

I believe the recently adopted rule will have a negative impact on Montana by reducing important revenues this state receives from Federal royalties. The Office of Natural Resource Revenue has an important mission and appropriate development of America's abundant natural resources is essential for economic growth and funding of important Montana government services.

Repeal of this rule will return the regulations to the previous status quo and the market place will respond accordingly.

Thank you for your attention to this important matter.

Respectfully,

A handwritten signature in black ink that reads 'Bud Clinch'. The signature is written in a cursive, flowing style.

Bud Clinch, Executive Director
Montana Coal Council