



Southall, Armand <armand.southall@onrr.gov>

---

## ONRR-2017-0001, Repeal of Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform

1 message

---

**Norm Lutter** <normlutter@gmail.com>  
To: armand.southall@onrr.gov

Wed, May 3, 2017 at 6:07 PM

I'm writing to support the regulations passed by ONRR that reformed royalty valuation on taxpayer-owned coal. ONRR did the right thing by closing the gaping loopholes that allowed coal companies to dodge royalty payments owed to American taxpayers, and ensuring that companies pay their fair share. Instead of paying royalties based on non-arms-length transactions to subsidiaries, royalties should be calculated off arm's-length sales, capturing what this coal is actually worth.

ONRR's rules should reflect the true value of publicly-owned coal and ensure fair value to taxpayers. Keep the loopholes closed.

Thank you.

Norman Lutter  
Cheyenne, WY