TREASURE STATE
RESOURCES ASSOCIATION
OF MONTANA

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April 14, 2017

Office of Natural Resources Revenue
Document Processing Section
APR 17 2017
Received
Lakewood, Colorado

Attn: Armand Southall
Office of Natural Resources Revenue Building
Denver Federal Center
West 6th Avenue and Kipling Street
Denver, CO 80225

RE: Regulation Identifier Number 1012-AA20; Repeal of Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform

Dear Sir:

The Treasure State Resources Association (TSRA) is a coalition of natural resources industries, organized labor, agriculture, businesses and over twenty other membership organizations. We work to support the responsible use and development of our natural resources and the jobs and quality of life it provides for our state.

We support the repeal of the Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform. Well over a year ago we requested an extension of time to comment on this complex and ill-conceived rule. We noted the need for extensive revisions to the draft changes that appeared to set decades-old policy for valuing resources on its ear. We were, and remain concerned such a dramatic shift in policy would ultimately reduce revenue for the federal and state government due to a reduction in resource development. That would impact our membership, but more important, the citizens of Montana.

Repealing the rule and reverting to the former approach for valuing coal and other resources will provide certainty and clarity in the royalty process. That certainty and predictability are key elements for responsible development of federal energy resources. For that reason, we support RIN 1012-AA20.

Thank you for this opportunity to comment.

Sincerely,

Peggy Trenk
Executive Director