

# PUBLIC SUBMISSION

<b>As of:</b> 5/5/15 12:36 PM
<b>Received:</b> May 05, 2015
<b>Status:</b> Posted
<b>Posted:</b> May 05, 2015
<b>Tracking No.</b> 1jz-8iog-mdp8
<b>Comments Due:</b> May 08, 2015
<b>Submission Type:</b> Web

**Docket:** ONRR-2012-0004

Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform RIN 1012-AA13

**Comment On:** ONRR-2012-0004-0024

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

**Document:** ONRR-2012-0004-0200

Erik Strom

---

## Submitter Information

**Name:** Erik Strom

---

## General Comment

I opposed the proposed rule; the long-standing rules governing royalty valuation should stay the same on coal. The proposed rule is the wrong way to go as it creates significant uncertainty. The proposed rule punishes low cost energy producers that sell to small industrial customers and export coal, and hurts coal cooperatives and captive mine power plants; discourages low cost energy production on federal lands; and needs more study and review.

2014, coal producers in Wyoming and Montana paid over \$600 million in federal royalties alone, half of which were disbursed back to the states for education and infrastructure. I believe the proposed rule would likely diminish coal production and in turn reduce these important federal and state revenues. The proposed changes will only result in business uncertainty, confusion and unnecessary higher consumer costs and hurt the economy.