

PUBLIC SUBMISSION

| |
|-----------------------------------|
| As of: 4/15/15 2:13 PM |
| Received: April 14, 2015 |
| Status: Posted |
| Posted: April 15, 2015 |
| Tracking No. 1jz-8iag-fr9f |
| Comments Due: May 08, 2015 |
| Submission Type: 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-2012-0004-0102

Comment from Angel Leegaard,

Submitter Information

Name: Angel Leegaard

Address: 82727

Email: smilin_angel101@hotmail.com

General Comment

1. Creates significant uncertainty within the coal industry.
2. Gives the Secretary of the Interior too much power- this is along the same lines as the EPA overreach!
3. Punishes miners that sell to small industrial customers and export coal, and hurts coal cooperatives and captive mine power plants. When the mines and coal producers have to pay more in royalty there are more miners that are at risk of losing their jobs. Overall this hurts the economy because of government rules and regulations interference with a natural economy.
4. Discourages federal lands energy production
5. The federal government is becoming more greedy and wanting additional funds to cover unnecessary programs that should be cut from the budget. There are far too many taxes and royalties going to fraudulent agencies in the government umbrella.
6. Needs more study and review!!! The taxes and royalty that coal producers pay is fair economically to the government based on the price of the coal coming out of the ground and based on index valuation for the market. The proposed rule is just asking for an additional royalty on end value and would hurt companies due to the cost of transportation for exports. Non-Arms length sales are monitored and we already pay imputed revenue on these sales if the average mine price is lower than the non-arms length sale. Therefore any variance between the average mine price and the NAL price is added to the total revenue and we pay the 12.5% royalty on the imputed revenue. The government is not being cheated. The process of reporting may need to be cleared up and spelled out better in regulations but the calculation and end payment is fair.
7. Big government is overreaching again.