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July 26, 2011

Ms. Hyla Hurst
Regulatory Specialist
Office of Natural Resources Revenue
P.O. Box 25165
Denver, CO 80225

Dear Ms. Hurst:

RE: RIN 1012- AA00, Advanced Notice of Proposed Rulemaking on Federal and Indian Coal Valuation

On May 27, 2011, the Office of Natural Resources Revenue (ONRR) published an advanced notice of proposed rulemaking (ANPR) regarding potential changes to federal and Indian coal valuation regulations. 76 Fed. Reg. 30,881.

The Wyoming Mining Association (WMA) is a statewide trade association representing bentonite, coal, trona (which is processed into soda ash), and uranium producers. Wyoming leads the nation in production of all four of those mineral commodities.

WMA does not believe wholesale changes to the coal royalty valuation regulations are justified. While the current regulations may not be perfect in all respects, they are workable and provide much needed certainty to both regulators and the regulated community. Broad changes to the regulations would create regulatory uncertainty that would outweigh the benefits of simplification.

WMA also endorses the comments submitted by the National Mining Association.

Sincerely,
WYOMING MINING ASSOCIATION

A handwritten signature in blue ink that reads 'Marion Loomis'.

Marion Loomis
Executive Director