

751545

RECEIVED

2015 FEB 24 AM 11:07

AVIS®

OFFICE OF THE  
EXECUTIVE SECRETARIAT

Avis System Licensee  
Rovar, LLC  
913 W. Brundage Lane  
Sheridan, WY 82801

February 13, 2015

The Honorable Sally Jewell  
Secretary  
Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

RE: Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform  
(ONRR-2012-0004 (1012-AA13))

Dear Secretary Jewell:

Please support the request made by various groups and organizations to provide a 60 day extension of the comment period for the "Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform." The complexity of this proposed rule dictates additional time is necessary to review the implications of the change and provide informed comments to the Department to help develop a sensible, reasonable policy for federal lessees, buyers of oil, gas, and coal, taxpayers and other impacted by such a change.

The current rules and regulations for leasing and producing federally-owned coal have created substantial revenues for federal and state governments, including an estimated \$876 million from royalties in fiscal year 2012 alone. As the ONRR's charge is "to collect, disburse and verify Federal and Indian energy and other natural resource revenues on behalf of all Americans," the Office should be very mindful not to discourage investment in federal resources through rulemaking that would dramatically change how royalties are calculated, leading to reduced revenues to fund both federal and state priorities.

For these reasons, I ask that you provide the requested 60 day extension of the comment period of the proposed "Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform."

Thank you for your time and attention to this matter of significant importance and ramifications.

Sincerely,



Dawn Helling  
Location Manager  
Avis Rent a Car Licensee  
Sheridan, Wyoming