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MONTANA STATE AFL-CIO

Home of the Montana Labor Movement

May 7, 2015

Armand Southall
Regulatory Specialist
Office of Natural Resources Revenue
P.O. Box 25165
MS61030A
Denver, CO 80225

Dear Mr. Southall:

We write concerning a proposed rule – Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform – from the Department of the Interior’s Office of Natural Resources Revenue (ONRR).

New federal policies, including this proposed rule, could have a significant and detrimental impact on federal energy production. In turn, reduced federal energy production decreases critical state and local tax revenue, leaving difficult cuts to government programs or the requirement to raise taxes in other areas. As our state already faces tough budget decisions, this rule threatens to make these problems worse.

In addition, federal energy production is one of the backbones to our state’s economy. Many of our members work in sectors that remain competitive in large part because of the low energy costs Montana has. Those low energy costs are a result of Montana’s abundant natural resources, which can and should be used in a responsible way to benefit the state’s residents.

Unfortunately, not enough is understood about the implications of this rule despite the extended comment period. If allowed to go forward without significant revision and consultation with all stakeholders, this rule could add an undue burden to the State of Montana.

We ask that you review the Department of Interiors rule proposal to ensure Montana’s key views on federal energy production are heard.

Sincerely,

Alan D. Ekblad
Executive Secretary
Montana State AFL-CIO

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