



Southall, Armand <armand.southall@onrr.gov>

Close the Dirty Coal Loopholes Costing Taxpayers Billions

1 message

brooke still <feedback@lcv.org>
Reply-To: brooke still <brookeestill@gmail.com>
To: armand.southall@onrr.gov

Wed, Mar 25, 2015 at 12:04 PM

Mar 25, 2015

Armand Southall

Dear Southall,

As a U.S. taxpayer concerned about dirty coal companies taking advantage of outdated rules when mining coal on federal land, I am writing in support of the Federal & Indian Coal Valuation Reform (RIN 1012-A13). I agree that the proposed rule is good step in the right direction to ensure that coal companies are not taking advantage of royalty loopholes that are costing taxpayers tens of billions; however, the rule does not go far enough in its present form.

In addition to closing royalty loopholes and ensuring that coal companies aren't making arm-in-arm transactions, the rule should ensure that the transaction rate on which the royalty is assessed accurately reflects the fair market value of coal. Coal production should also be held to similar mineral production standards and subsidies for transportation, and coal washing expenditures should be capped at 50% of total costs similar to the oil and gas industry. Lastly, the royalty rate assessed to coal should match the rates assessed to offshore oil and gas.

The proposed rule was a step in the right direction but I believe making the rule stronger will go a long way to ensure that American taxpayers are receiving a fair and balanced return on coal production on federal lands.

Sincerely,

brooke still

DC 20009