

# CARLTON REAL ESTATE

January 12, 2015

The Honorable Sally Jewell

Secretary

Department of the Interior

Subject: Consolidation Federal Oil and Gas and Federal and Indian Coal Valuation Reform

(ONRR-2012-0004 (1012-AA13))

Dear Secretary Jewell:

We are writing to request the Department of the Interior provide a 60-day extension of the comment period for the "Consolidation Federal Oil and Gas and Federal and Indian Coal Valuation Reform." The complexity of this proposed rule requires additional time review the possible implication of the change and provides informed comments to the Department to help develop a reasonable policy for Federal lessees, buyers of oil, gas, and coal, taxpayers, and others impacted by such a change.

We at Carlton Real Estate have an interest in Federal energy resources and find the draft rule complicated and in need to extensive comment and revision. As the ONRR's charge is "to collect, disburse, and verify Federal and Indian energy and other resource revenues on behalf of all Americas," the Office should be mindful not to discourage investment in federal resources through rulemaking changing how royalty is calculated, leading to reduced revenues to fund needed federal and state priorities.

We are asking you to provide a 60-day extension of the comment period for the proposed "Consolidation Federal Oil and Gas and Federal and Indian Coal Valuation Reform.

Kindest regards,



Margaret Carlton

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