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Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform

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General Comment

The proposed rule by the ONRR creates a significant amount of uncertainty within the way coal is taxed and makes it very hard and undefined for a company to have a standard tax liability. This rule gives the Secretary of Interior too much power and the ability to pick any form of tax calculations they want. The rule will hinder coal company's abilities to stay open and will take income away from the federal and state government's because companies will not be able to afford to export coal, creating less coal to be taxed.