

PUBLIC SUBMISSION

As of: 4/21/15 11:44 AM
Received: April 20, 2015
Status: Posted
Posted: April 21, 2015
Tracking No. 1jz-8iel-6wuj
Comments Due: May 08, 2015
Submission Type: Web

Docket: ONRR-2012-0004

Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform RIN 1012-AA13

Comment On: ONRR-2012-0004-0024

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

Document: ONRR-2012-0004-0118

Michael Kollker

Submitter Information

Name: Michael Kollker

General Comment

RE: (RIN) 1012-AA13, Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform

To whom it may concern,

My name is Michael Kollker. I am a law student at the University of Wyoming. I was pleased to hear that there is some legislation on the table aimed at addressing coal extraction companies who dodge their duty to pay royalties to the public owners of their products.

Im writing to support reform of royalty valuation on taxpayer-owned coal. We need to close the gaping loopholes that allow coal companies to dodge royalty payments owed to American taxpayers, and ensure that companies pay their fair share. Instead of paying royalties based on non-arms-length transactions to subsidiaries, royalties should be calculated off arms-length sales, capturing what this coal is actually worth.

Your final rule should reflect the true value of publicly-owned coal and ensure fair value to taxpayers by basing royalties on the final sale of the coal to a power plant, exporter, or other end-user. It should also cap deductions for transporting and washing coal instead of allowing companies to pass these full costs onto the public.

In other words, do your jobs and pass a new rule that makes sense for the majority interest, the public's.

Thank you.