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Comment On: ONRR-2012-0004-0024

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

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Comment from Michael Trainor,

Submitter Information

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General Comment

The Proposed Rule

1. Creates significant uncertainty;
2. Gives the Secretary of the Interior too much power;
3. Punishes miners that sell to small industrial customers and export coal, and hurts coal cooperatives and captive mine power plants
4. Discourages federal lands energy production
5. Needs more study and review