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General Comment

I would like to emphasize the findings of the Center for American Progress, with whom I am not affiliated.

http://www.eenews.net/assets/2015/01/06/document_gw_01.pdf

The world needs to be winding down fossil fuel production in the next decade or two. Now is the time to REDUCE incentives to take coal from public land to harm the public's environment. As a minimum, royalties should be based on a fair market value, not involving sales to subsidiaries