

My name is Travis Deti. I am the assistant director of the Wyoming Mining Association, and I'm going to read off my phone so I would appreciate your indulgence if I screw up a little bit. Thank you, first of all, for the opportunity to comment on BLM's review of the federal coal leasing program. As you pursue the review of this vital program, we believe it is imperative to look at areas where actual improvements can be made to make the program better. For example, we support addressing the lengthy and costly time frame for acquiring and processing coal leases, determination of fair market value and increased transparency. BLM is charged with ensuring the resource is managed responsibly, and we hope that it would take steps to ensure that the political efforts to use the coal leasing program to further burden the industry and curb coal use are avoided. Attempts to restrict access to the resource through royalty rate increases, for example, are in no one's interest. BLM must look at improvements to manage the resource appropriately in a manner that does not put it off limits and make it uneconomical to mine for political reasons. Additionally, it's presumed that BLM is exploring using a nebulous, anecdotal, and social cost standard when determining fair market value. Attempts to artificially increase the fair market value and raise costs of leases on leased grounds appear political with the intent of making the resource uneconomical to develop. If the agency does choose to pursue this, we surely recommend the inclusion of a much more empirical social benefit standard to include not only the positive economic realities of vital jobs and revenues, schools, and infrastructure but the measurable positive contribution and reliable low cost electricity for our country and the world. The BLM federal coal leasing program is a great value for the taxpayers and those who rely on affordable electricity, in other words everyone. No one is being short-changed. While they're making room for process improvements, continuing the program is certainly in the best interest of Wyoming and the United States of America. Your decision on the program will have real impact on real people, and I implore you to keep that in mind. Thank you for time and consideration.