

Hello. I'm Ellen Pfister, and I wish to thank the Bureau of Land Management, the Department of Interior for allowing me to present comments on the federal coal leasing program on behalf of the Western Organization of Resource Councils and Northern Plains Resource Council and myself as a citizen affected by the coal leasing program. I ranch north of Shepherd, Montana, and the north end of my ranch is being under-mined for coal thanks to a coal-for-land trade 25 years ago. And my next neighbors will be under-mined thanks to a federal coal lease. The mine is speculative and has been in search of a market since it was conceived, and it thought it had a market, and the market is now going downhill. So now is a good time for BLM to stop and take an assessment of its procedures. The coal industry is in a great state of flux now, and they need to determine how they want to handle their federal coal reserves for future use. Much of BLM's 570 million acre mineral estate in the West is under private surface such as mine. And as the surface owner, I am very concerned about this. This thing has hung over my head for 25 years. Only one thing will be mined from the coal deposit, but the lease is for all the coal. And so we actually stand a potential for being under-mined two or three more times, and we don't know when the lease expires. Does it expire when the main seam is taken? Does it expire a hundred years from now when maybe they get around to the last one? There's no certainty when you coal -- when you own surface over federal coal, and there's a lot of private surface owners in the West in that situation. The easy profitable coal has been mined in the last 40 years at a much faster rate than was initially anticipated when leasing began in earnest. The funds to reclaim the mines should be available, but apparently they are not. I could foresee something happening under OSM's aegis where the self-bonded material is sold to satisfy the debtors. The State of Wyoming may decide that the debt for reclamation is too big for it to handle, and then BLM would could wind up with their leases with just a big hole in the ground. And there's no way you're going to multiple-use those holes. BLM should not grant any more coal leases until reclamation is caught up with on the leases.