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From: rrcwebcontact@gmail.com
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To: Rules Coordinator
Subject: Comment Form for Proposed Rulemakings

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Comments Form for Proposed Rulemakings

Date Submitted

Thursday, September 19, 2019 7:37:56 PM

Submitted By

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I request my e-mail address remain confidential

Amend §12.108, Permit Fees

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09/19/2019

Commissioners, Exec. Dir. Wang, Gen. Counsel and Interim SMRD Dir. Schoch:

For several years the Texas Mining and Reclamation Association(TMRA) has worked very closely with the Surface Mining Division with respect to Division Staffing, areas of coordination and improvement and, with that, the basis for and amount of fees necessary to meet legislatively required funding for the Division. Our work with the Division was so that we understood the Division's plan of action and needs and how our TMRA Members could best work with the Division to meet its goals and objectives while at the same time meeting our permitting review and timeline

requirements. This approach has for several years worked well.

This year, 2019, with changes within the Division and, to some extent, our failure to make clear early in the year our desire to again understand SMRD goals, objectives, staffing and budget needs and work with the Division on its priorities and ways to gain efficiencies from both our Members and the SMRD Staff, we were not "in the loop" as we have been for the past several years.

The above comment is NOT to place blame or to in any way slow down this rulemaking process, only to point out this less than optimal coordination and request that we all work together closely during 2020. It will come as no surprise that higher fees to our industry which is already working under immense pressures causes concern. For those Mines that are active and as more of our Mines are in Closure or moving toward closure, it is more important than ever that our industry work closely with the Commission to optimize the efficiency of our resources and those of the Commission. We must all continue to do more, even better, with less.

Ever since I worked for the Commission, along with many others including those in the Coal and Lignite industry, and was tasked with assuring that the Commission and Commissioners had the opportunity to review and approve our Texas Program that became the FIRST approved State Program in the United States, Texas has been recognized as not just first but also BEST! This is thanks to BOTH the work of this Commission and the absolute commitment and dedication of the Permittees. While we have different roles, they are both important and, for success, we must continue to work TOGETHER!

Thanks for this opportunity to submit comments.

Respectfully Submitted,
Ches Blevins
TMRA Exec. Dir. & Gen. Counsel

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