



December 9, 2016

Ms. JenAlyse Arena  
EIA-7 Survey Manager  
Energy Information Administration  
EIA-24  
1000 Independence Avenue, SW  
Washington, D.C. 20585

**RE: Comments on Energy Information Administration (EIA) Proposed Change to Data Collection and Value of EIA Coal Data Collection**

Dear Ms. Arena:

The National Mining Association (NMA) appreciates the opportunity to provide comments on EIA's proposed survey form extension and changes (*Federal Register* Notice, Sep. 16, 2016, Vol. 81, No. 180, Page 63751).

NMA applauds the EIA Coal Team's continuing quest to improve coal survey data collection and reporting as evident in the current 3-year coal form extension effort. NMA's coal producing members and those members dependent on the coal industry find the coal data useful for marketing, trend analysis and forecasting. As an association, the data EIA collects allow NMA to track and measure industry trends. We believe the availability of comprehensive and timely data reporting is necessary in the formulation of informed policy decisions. Complete, timely, reliable publicly available data on the coal sector is greatly valued by the coal industry and by the public and private sectors for sound business, energy and environmental policy decisions. EIA data is generally considered an objective source of information. We become concerned when EIA eliminates collection of data and reports we consider essential to the energy industry's understanding of the coal market. EIA's *Weekly Coal Production Report* estimations, for example, are very helpful as an indicator of output levels state-wide in advance of the more detailed MSHA quarterly production data (Form 7000-2) which lags by several months.

Please accept our comments on the EIA-3Q, 7A and 8A coal survey forms.

Form EIA-3Q Survey

NMA supports the agency's proposal to re-title the 3Q survey to "Quarterly Survey of Industrial, commercial & Institutional Coal Users." In addition, allowing for reporting of more than one fuel source, adding distinction between domestic and export sales of coke and breeze, revising coal refining disposition categories and the addition of questions regarding coke oven operations and contact information should all improve the quality of the survey data with minimal additional burden hours.

Form EIA-7A Survey

The addition of export categories plus more simplified wording on other sales questions may reduce double counting. In Part 5, the rewording of the question on operating capacity should

improve assessment of the mine's operating level. Similarly, rewording for the estimated reserve question will provide better clarification to respondents.

Form EIA-8A Survey

The inclusion of "in-transit" coal to the list of locations of coal stocks is a needed addition to the 8A survey. We also agree that collecting greater detail on coal export sales (export port and country) will improve the reporting of exports and provide a check against the U.S. Census coal trade data which is "as reported" and preliminary.

Again, we appreciate the opportunity to offer these comments.

Sincerely,  
/s/ Leslie Coleman

Leslie Coleman  
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National Mining Association  
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(202) 463-9780

## Arena, JenAlyse

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**From:** Arena, JenAlyse  
**Sent:** Tuesday, December 13, 2016 11:20 AM  
**To:** 'Coleman, Leslie'  
**Subject:** RE: Coal Forms Clearance Package - NMA Comments

Good Morning Leslie,

Thank you for the comments.

JenAlyse Arena  
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U.S. Energy Information Administration  
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