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September 8, 2008

John Bunyak

Air Resources Division

National Park Service

P.O. Box 25287

Denver, Colorado 80225

Re: FLAG 2008 Draft Guidance Report

Dear Mr. Bunyak:

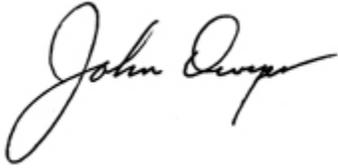
Regarding the FLAG 2008 Draft Guidance Report, the Lignite Energy Council ("LEC") submits legal and policy comments prepared by Paul Seby, Moye White, LLP and technical comments prepared by Bob Paine, ENSR Corporation. Both of these sets of comments have been prepared on behalf of the Lignite Energy Council.

The LEC is a regional, non-profit organization whose primary mission is to promote the continued development and use of lignite coal as an energy resource. The LEC's membership includes: (1) producers of lignite coal who have an ownership interest in and who mine lignite; (2) users of lignite who operate lignite-fired electric generating plants and the nation's only commercial scale "synfuels" plant that converts lignite into pipeline-quality natural gas; and (3) suppliers of goods and services to the lignite coal industry.

The LEC appreciates the Federal Land Managers efforts at revisiting and attempting to update the FLAG 2000 Report. The LEC would appreciate your consideration of incorporating the comments in Attachment 1 "An Analysis of the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report (Revised) and its Impact on the Development of a National Energy Policy"; and, Attachment 2 "Lignite Energy Council Comments on the Draft FLAG 2008 Guidance." The LEC believes that incorporation of the comments provided in the attached documents will improve the FLAG 2008 Report, with respect to consideration of providing balance in energy development and environmental protection.

Sincerely,

LIGNITE ENERGY COUNCIL

A handwritten signature in black ink, reading "John Dwyer". The signature is written in a cursive style with a large, looping initial "J" and a long, sweeping underline.

John Dwyer

President

Enclosures