

**Rich Nolan**  
President & CEO

September 2, 2025

The Honorable Steve Daines  
U.S. Senate  
320 Hart Senate Office Building  
Washington, D.C. 20510

The Honorable Troy Downing  
U.S. House of Representatives  
1529 Longworth House Office Building  
Washington, D.C. 20515

The Honorable Tim Sheehy  
U.S. Senate  
124 Russell Senate Office Building  
Washington, D.C. 20510

The Honorable Ryan Zinke  
U.S. House of Representatives  
512 Cannon House Office Building  
Washington, D.C. 20515

Dear Senator Daines, Senator Sheehy, Representative Downing, and Representative Zinke:

On behalf of the National Mining Association, I write in support of your Congressional Review Act legislation to disapprove of the Bureau of Land Management's (BLM) rule related to the "Miles City Field Office (MCFO) Record of Decision and Approved Resource Management Plan Amendment" (S.J. Res. 61/ H.J. Res. 104). Your resolutions reverse the Biden Administration's de facto coal moratorium on new federal coal leasing in the Powder River Basin.

As you know, coal is increasingly needed to address our rapidly growing electricity demand and to maintain grid reliability, especially during periods of peak demand or disruptions to other energy sources. U.S. electricity demand is projected to double by 2050, with a remarkable jump in demand already underway.<sup>1</sup> This skyrocketing demand is driven by the use of artificial intelligence, conversion to electric heating, construction of data centers, and uptake of electric vehicles. A recent forecast sees demand rising 128 GW over just the next five years—equivalent to adding 80 million homes to our already overstretched and under-supplied grid.<sup>2</sup>

While demand for electricity is skyrocketing, growth in energy resources faces more resistance than ever in the form of permitting delays and supply chain constraints. In

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<sup>1</sup> Axios, Exclusive: Electricity demand to rise 78% by 2050, study says (May 25, 2025), available at <https://www.axios.com/2025/05/20/electricity-demand-projection-2050-icf>.

<sup>2</sup> Utility Dive, Five-year US load growth forecast surges 456%, to 128 GW: Grid Strategies (Dec. 6, 2024), available at <https://www.utilitydive.com/news/shocking-forecast-uselectricity-load-could-grow-128-gw-over-next-5-years-Grid-Strategies/734820/>.

the face of these diverging trends, which are becoming more alarming every day,<sup>3</sup> reliable coal-fueled electricity is needed now more than ever.

The 2024 MCFO RMP amendment finalized by the Biden Administration was a legally flawed and politically motivated attempt to prohibit new federal coal leasing on more than 1.2 million acres within the MCFO planning area.<sup>4</sup> Your resolutions would require that a future RMP “may not be reissued in substantially the same form.”<sup>5</sup> This means that, since the intent and effect of the Biden RMP was to impose a federal coal leasing moratorium in the planning area, a prohibition on a substantially similar rule would prohibit the BLM from instituting a future coal leasing moratorium.

Energy insecurity is a growing problem in the U.S. Dispatchable baseload power from coal that is reliable and affordable addresses this need and is critical to our economic and national security. Your resolutions will help ensure that our country has access to the energy resources we need to power our future.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Rich Nolan', with a long horizontal flourish extending to the right.

Rich Nolan

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<sup>3</sup> See Department of Energy Releases Report on Evaluating U.S. Grid Reliability and Security, available at <https://www.energy.gov/articles/departments-energy-releases-report-evaluating-us-grid-reliability-and-security>.

<sup>4</sup> National Mining Association, June 17, 2024 protest letter, and Aug. 3, 2023, comments available at [https://eplanning.blm.gov/public\\_projects/2021239/200533937/20123668/251023648/NatMiningAssoc.pdf](https://eplanning.blm.gov/public_projects/2021239/200533937/20123668/251023648/NatMiningAssoc.pdf).

<sup>5</sup> 501 USC § 801(b)(2).