AMERICAN CONSOLIDATED NATURAL RESOURCES, INC.
46226 NATIONAL ROAD ST. CLAIRSVILLE, OHIO 43950

March 19, 2025

The Honorable Jamieson Greer
Ambassador
U.S. Trade Representative
600 17th Street NW
Washington, DC 20508

Dear Ambassador Greer:

We refer to the potential cessation of coal exports from the United States of America due to findings in the Section 301 investigation of the People's Republic of China's ("PRC") targeting the maritime, logistics, and shipbuilding sectors for dominance ("USTR Findings"). As a result of the USTR findings, the United States Trade Representative has published its Proposed Action which, if adopted, would introduce fees ("Proposed Fees") at the coal export terminals that will add between $10 per ton of coal to $20 per ton of coal to American Consolidated Natural Resources, Inc.'s ("ACNR") cost to deliver ACNR's coal to ACNR's export customers. Such a surcharge will render the shipment of ACNR's export coal uncompetitive. The export customers will turn to less expensive coal from South Africa, Russia, Australia, Canada, Indonesia, Columbia, and China.

As a result of the policies of the prior administration, and actions taken to prematurely shutter dispatchable coal-fired electric generation, domestic demand for thermal coal has declined drastically. Due to these misguided actions, our Country now faces a shortage of reliable and dispatchable electric generation necessary to 1.) achieve the development of Artificial Intelligence in advance of China and the rest of the world, 2.) provided low cost power to citizens and businesses of the Country, 3.) meet the increased industrial demand for electricity that will result from the actions of President Trump, and 4.) ensure the national security of the Country. Indeed, our company has worked tirelessly to keep our employees working despite the many environmental and regulatory policies that have been implemented to eliminate our thermal coal industry. Our actions to preserve our industry, and company, included the development of export channels for our thermal coal product, where we currently ship nearly forty percent (40%) of our coal production. If the Proposed Fees are adopted, as currently drafted, ACNR will be required to cover the Proposed Fees rendering our export coal worthless. This is a fact, as no vessel owner will make a US port call with an empty bulk vessel without indemnification from the coal producer to cover all fees and taxes associated with the Proposed Fees. This is a surcharge that the industry simply cannot afford, nor do we believe that it is the intent of this administration.

Our employees have been demonized by the prior administration and have nearly lost all hope as to the survival of their jobs. They have endured; bankruptcy, loss of domestic markets due to ill-advised premature closures of coal-fired electric generating stations, unwarranted attacks from NGO's, and encyclopedias of environmental regulations meant to eliminate their existence. On January 20, 2025, new life was given to these employees with the inauguration of President Donald J. Trump. Today, they are hopeful that their jobs, and industry, will continue to provide the one fuel that can energize the world reliably and cost effectively. If implemented, the Proposed Fee will, once again, snatch this hope from these hardworking individuals, as such an action will force ACNR (the largest underground thermal coal mining company in the Country with approximately fifty (50) million annual tons of thermal coal production under management) to lay off 3,900 hardworking coal miners in West Virginia and Illinois, including 1,700 employees that are union represented members of the United Mine Workers of America. Apart from the loss of the ACNR's 3,900 jobs, there will be many more indirect jobs lost that supply materials and services to support these 3,900 coal miners and their families.

ACNR respectfully requests that the Proposed Fees be delayed until an adequate number of United States of America registered cargo ships are available to transport ACNR's coal. The thermal coal industry cannot carry this undue and unnecessary burden. Our industry and our employees have been unfairly penalized enough over the last four (4) years. We support the program for tariffs to protect, and create, jobs in this Country, but this particular Proposed Fee works against this objective as currently drafted.

I am available to discuss these issues with you at any time and at any location that may be convenient for you.

Sincerely,

American Consolidated Natural Resources, Inc.

Robert D. Moore
President and Chief Executive Officer