



Qualifying Income From Activities of Publicly Traded Partnerships With Respect to Minerals or Natural Resources

This is a Comment on the **Internal Revenue Service (IRS)** Proposed Rule: **Qualifying Income from Activities of Publicly Traded Partnerships with Respect to Minerals or Natural Resources**

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Comment

I am writing this comment to express my disappointment in the IRS revoking the PLR which was the basis of the creation of WLKP. I invested in WLKP in good faith assuming it would be successful like many existing MLPs. Under no circumstances did I ever imagine that WLKP would be considered to not meet the formal definition of a MLP. For the IRS to allow the MLP to be created in the first place knowing that the PLR could be revoked is irresponsible. Please consider leaving the PLR in place or grandfather in WLKP so it is no longer negatively impacted by the revoked PLR. As an investor, I personally prefer to keep WLKP in place versus dissolving in it within a 10 year period.