



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

Subject: The IRS needs to abide by their initial ruling on WLKP as a "MLP"

RE: Internal Revenue Service ("IRS") and the U.S. Department of Treasury concerning section 7704(d)(1)(E) of the Internal Revenue Code

The proposed regulations effectively revoke a previously issued private letter ruling ("PLR") by the IRS, which served as the underlying basis for the decision to form WLKP as a master limited partnership ("MLP") in 2014.

As a shareholder in WLKP, I believe this reversal, even with a ten-year transition period, is unfair to me and other unitholders and sends an unfortunate message to investors and businesses that they cannot rely on IRS rulings. Additionally, this proposed ruling has already had a significant negative impact on the market value of both WLKP and Westlake Chemical Corporation

DO NOT REVOKE THE PREVIOUSLY ISSUED "PLR" REGARDING WLKP AS A "MLP".

Thank you for your attention to this matter.

Sincerely,
Lance Moore