

September 20, 2013

Armand Southall
Regulatory Specialist
ONRR
Building 85, Room A-614
Denver Federal Center
West 6th Avenue and Kipling Street
Denver, Colorado 80225

VIA FEDERAL EXPRESS

RE: **Regulation Identifier Number 1012-AA14**
Amendments to ONRR's Service of Official Correspondence

Dear Mr. Southall:

Energen Resources Corporation appreciates the opportunity to comment on the above referenced Rule (RIN 1012-AA14). We respectfully object to Rule's allowance of electronic delivery for service of official correspondence. Such official correspondence may involve time sensitive information and a failure by the recipient to receive and respond to it may result in significant adverse consequences including penalties.

Email subjects official correspondence to a number of delivery risks including (1) system malfunctions on the part of the sender or recipient, (2) recipient spam filters, (3) power outages, and (4) change in job assignments, leaves of absence, vacation or employment termination of the email address holder.

The Rule refers to Form ONRR-4444 as the source of email addresses. The instructions to that Form, however, provide that official correspondence will be mailed to the Address or Addressee of Record. The use of mail delivery provides greater certainty of delivery and receipt of official correspondence.

We also note that the instructions to Form ONRR-4444 (1) prohibit having more than one Address or Addressee of record for any correspondence type and (2) provide that changes to the Address or Addressee of record cannot be made by phone or by email.

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By way of example, an Addressee of Record may be absent from the office for an extended period of time due to unexpected illness. In such a situation, responsibility for receiving and sorting mail delivered to the absent employee can be immediately assigned to and handled by a co-worker. Such is not the case with email accounts subject to password and other security protections.

We request that ONNR continue its longstanding practice of delivering official correspondence by mail.

Sincerely,



J. David Woodruff

JDW/tc