



January 29, 2015

Ms. Kris Sarri
Principal Deputy Assistant Secretary for Policy, Management and Budget
U.S. Department of Interior
Washington, DC

Re: **Request for Extension of Comment Period for the *Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform* Proposed Rule, 80 Fed. Reg. 608 (Jan. 6, 2015)**

Submitted via Regulations.gov

Dear Ms. Sarri:

The American Petroleum Institute (“API”), the Council of Petroleum Accountants Societies (“COPAS”), the Independent Petroleum Association of America (“IPAA”), the National Mining Association (“NMA”), and the Western Energy Alliance (“the Alliance”) respectfully request a 90-day extension of the period provided for reviewing and providing comments on the Office of Natural Resource Revenue’s (“ONRR”) proposal to change the regulations governing valuation for royalty purposes of oil and gas produced from Federal onshore and offshore leases and coal produced from Federal and Indian leases. 80 Fed. Reg. 608 (Jan. 6, 2015).

API is a national trade association that represents over 625 members involved in all aspects of the oil and natural gas industry, including the exploration and production of both onshore and offshore federal resources. The U.S. oil and natural gas industry supports 9.8 million U.S. jobs and 8 percent of the U.S. economy. The industry has paid more than 150 billion dollars in royalty revenues to the federal treasury.

COPAS is a professional organization comprised of the oil and gas industry’s most knowledgeable and influential accounting professionals. COPAS has operated as a non-profit entity for 50 years and has over 4,000 members with 24 societies in the United States and Canada. The societies have developed standardized documents in areas such as joint interest accounting, auditing, production volume and revenue accounting, and financial reporting and tax matters. Additionally, many COPAS members are responsible for the filing of the Federal royalty reports to the ONRR.

IPAA is the national association representing the thousands of independent crude oil and natural gas explorer/producers in the United States. It also operates in close cooperation with 44 unaffiliated independent national, state and regional associations, which together represent



thousands of royalty owners and the companies which provide services and supplies to the domestic industry. IPAA is dedicated to ensuring a strong, viable domestic oil and natural gas industry, recognizing that an adequate and secure supply of energy is essential to the national economy.

NMA's members are producers of most of America's coal, metals, industrial and agricultural minerals; manufacturers of mining and mineral processing machinery and supplies; transporters; financial and engineering firms; and other businesses related to mining. NMA's members include companies that lease federal coal and therefore have a significant interest in the ONRR proposed rule as it would unnecessarily and impermissibly make wholesale changes to coal valuation regulations.

The Alliance represents over 480 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. The Alliance represents independents, the majority of which are small businesses with an average of fifteen employees.

API, COPAS, IPAA, NMA and Alliance member companies are committed to continued compliance with royalty regulations consistent with the mineral leasing statutes. However, the proposed changes are very complex and could significantly impact American energy development. Considering the complexity and significance of the proposal, the 60-day comment period that ONRR has provided is insufficient for meaningful public review and comment. Therefore, we respectfully request that the comment period be extended an additional 90 days – to Monday, June 8, 2015 – so that the public, including interested companies and industry, can properly and adequately respond to the agency's proposed changes.

We appreciate ONRR's prompt attention to this request. Please accept this request on behalf of our members and please contact us if additional information is needed.

Sincerely,

Emily Hague
Senior Policy Advisor
Industry and Upstream Operations
American Petroleum Institute
202-682-8260

Pam Williams
Revenue Committee Chairperson
Council of Petroleum Accountants Societies
832-337-2592



Dan Naatz
Senior Vice President of Government Relations
and Political Affairs
Independent Petroleum Association of America
202-857-4722

Katie Sweeney
Senior Vice President, Legal Affairs
& General Counsel
National Mining Association
202-463-2627

Kathleen Sgamma
Vice President of Government & Public Affairs
Western Energy Alliance
303-623-0987