



July 7, 2015

U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3903

Via electronic submission to: <http://www.regulations.gov/>

Re: Incidental Take of Migratory Birds 2014-0067; Request for extension of comment period

To whom it may concern:

As you know, on May 26, 2015, the U.S. Fish and Wildlife Service published a Notice of Intent to prepare a programmatic environmental impact statement (PEIS) to evaluate the potential impacts of a proposal to authorize incidental take of migratory birds under the Migratory Bird Treaty Act. This letter is to request a 90-day extension in the formal regulatory comment period.

IPAA is a national trade association representing the thousands of independent oil and natural gas explorers and producers, as well as the service and supply industries that support their efforts. Independent producers drill about 95 percent of American oil and natural gas wells, produce more than 50 percent of American oil, and more than 85 percent of American natural gas. IPAA is dedicated to ensuring a strong, viable domestic oil and natural gas industry, recognizing that an adequate and secure supply of energy developed in an environmentally responsible manner is essential to the national economy.

API is a national trade association representing over 625 member companies involved in all aspects of the oil and natural gas industry. API's members include producers, refiners, suppliers, pipeline operators, and marine transporters, as well as service and supply companies that support all segments of the industry. API and its members are dedicated to meeting environmental requirements, while economically developing and supplying energy resources for consumers.

Environmental stewardship is a key pillar of oil and gas development in the United States. Our members want to ensure minimal incidental take occurs of all species, and we are carefully reviewing your notice as it pertains to oil and gas operations. In order to ensure that we and the companies we represent have adequate time to review and respond to this notice, we kindly that you extend the comment period to facilitate a more thorough response from one of the main industries that may be affected by this rulemaking.

We appreciate your consideration of this request. If you have any questions, please contact us phone at (202)857-4722 or at [dnaatz@ipaa.org](mailto:dnaatz@ipaa.org).

Sincerely,

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Independent Petroleum Association of America