



August 10, 2016

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Public Comments Processing, Attn: FWS-HQ-ES-2016-0004, or
NOAA-NMFS-2016-0004;
Division of Policy, Performance, and Management Programs
U.S. Fish and Wildlife Service
MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: Request for Extension of Comment Period FWS-HQ-ES-2016-0004, NOAA-NMFS-2016-0004. Joint U.S. Fish and Wildlife Service and National Marine Fisheries Service Habitat Conservation Planning Handbook, 81 Fed. Reg. 124 (Tuesday, June 28, 2016)

To Whom It May Concern:

The Independent Petroleum Association of America (IPAA), American Exploration & Production Council (AXPC), Western Energy Alliance and the Petroleum Association of Wyoming (PAW) respectfully request that the U.S. Fish and Wildlife Service (USFWS) extend the comment period on the USFWS's Draft Habitat Conservation Planning Handbook (Draft Handbook) by at least 30-days or until September 28, 2016.

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 and 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.

The American Exploration & Production Council ("AXPC") is a national trade association representing 29 of America's largest and most active independent natural gas and crude oil exploration and production companies. AXPC's members are "independent" in that their operations are limited to the exploration for and production of natural gas and crude oil. Moreover, its members operate autonomously, unlike their fully integrated counterparts, which operate in additional segments of the energy industry, such as refining and marketing. AXPC's members are leaders in developing and applying the innovative and advanced technologies necessary to explore for and produce natural gas and crude oil and that allows our nation to add reasonably priced domestic energy reserves in environmentally responsible ways.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. Alliance members are independents, the majority of which are small businesses with an average of fifteen employees.

PAW is Wyoming's largest oil and gas trade association, members of which produce over ninety percent of the natural gas and eighty percent of the crude oil in the state.

IPAA, AXPC, the Western Energy Alliance and PAW member companies have a vested interest in the policies, rules and regulations administered by the USFWS and are currently reviewing the Draft Handbook. Due to the voluminous nature of the document, however, additional time is needed to complete a comprehensive review. The Draft Handbook is nearly 400 pages in length, which requires significant time for inspection alone. A 60-day comment period is simply not adequate to afford the public the requisite opportunity to review, substantively analyze the proposal, consider any implications, and provide meaningful and usable feedback to the USFWS and NMFS.

The USFWS has recently issued several different proposals related to the conservation of threatened and endangered species and their habitat. Those overarching and overlapping proposals complicate the review and required analysis that the public must undertake to understand and provide meaningful comment on the potential implications of the current proposal. As such, we believe our request for a 30-day extension of the comment period to September 28, 2016 is both necessary and reasonable.

Thank you for your consideration of this request.

Sincerely,



Dan Naatz
IPAA

Bruce Thompson
AXPC

Kathleen Sgamma
Western Energy Alliance

Esther Wagner
PAW