



May 19, 2014

Douglas Krofta
U.S. Fish and Wildlife Service
Division of Conservation and Classification
4401 N Fairfax Drive, Suite 420
Arlington, VA 22203

Submitted via Federal eRulemaking Portal: <http://www.regulations.gov>

Re: Interagency Cooperation- Endangered Species Act of 1973, as Amended; Definition of Destruction or Adverse Modification of Critical Habitat [Docket No. FWS-R9-ES-2011-0072]

Dear Mr. Krofta:

The Independent Petroleum Association of America respectfully requests that the U.S. Fish and Wildlife Service (FWS) and the National Oceanic and Atmospheric Administration (NOAA) (collectively, the "Services") extend the public comment period for the notice of proposed rulemaking on the *Definition of Destruction or Adverse Modification of Critical Habitat* published in the Federal Register on May 12, 2014.

The Services have set a public comment deadline of July 11, 2014. Such review cannot be undertaken in the limited (60) day window for comments and information submittals that has been set by the Services. IPAA represents over 9000 independent oil and gas companies as well as service companies. In order to adequately review this proposed regulation with our members, more time is needed. IPAA requests that the Services extend the comment period by an additional ninety days to October 9, 2014.

IPAA also requests that the Services make a determination on the extension request well in advance of the current deadline of July 11, 2014 to afford stakeholders the opportunity to adequately prepare comments for the Services. Waiting until just days before the current deadline, or reopening the comment period once the deadline has passed, does not afford the public the ability to offer the best possible input on this policy matter.

Thank you for your consideration of this request.

Dan Naatz
Vice President of Federal Resources