



Office of Natural Resources Revenue
Building 53, Entrance E-20
Denver Federal Center
West 6th Ave. and Kipling St.
Denver, Colorado 80225

April 11, 2017

**RE: Docket ID: Docket No. ONRR-2017-0002; DS63644000 DR2000000.CH7000
178D0102R2; RIN 1012-AA21; Federal Oil and Gas and Federal and Indian Coal
Valuation.**

To Whom It May Concern,

The Independent Petroleum Association of America (IPAA) writes to request an extension of the comment period deadline for the Advanced Notice of Proposed Rulemaking (ANPR) on Federal Oil and Gas and Federal and Indian Coal Valuation printed in the Federal Register on April 4, 2017. Given the complexity of the rule, IPAA respectfully requests an extension of 60 days.

IPAA is the national association representing the thousands of independent crude oil and natural gas explorer/producers in the United States. We operate 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.

The ANPR which seeks to offer greater simplicity, certainty, clarity, and consistency is welcomed by our member companies. However, we feel the short time frame for comments is not adequate given the complex subject matter. We believe it is in the best interest of all stakeholders to grant an extension to the comment time period that is reflective of the complex nature of the rule. Thank you for your consideration and for your effort to work with industry to resolve this matter.

Sincerely,

Daniel T. Naatz
Senior Vice President,
Government Relations and Political Affairs
Independent Petroleum Association of America