



June 6, 2012

The Honorable Ken Salazar
Secretary
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Salazar:

The Independent Petroleum Association of America (IPAA) requests that the Department of the Interior (DOI) extend the comment period for an additional 90 days on the proposed rule for well stimulation, including hydraulic fracturing, on federal and Indian lands. The proposed rule was issued on May 11th and the comment period is currently set to close on July 10, 2012.

IPAA remains dedicated to working with DOI to support and promote the safe and responsible development of the nation's oil and natural gas resources on federal lands. However, the Bureau of Land Management's (BLM) proposed hydraulic fracturing rule is extremely detailed, complex and requires considerable technical analysis by the independent producers IPAA represents.

The proposed rule involves BLM's rulemaking regarding the regulation of hydraulic fracturing, wellbore integrity, and flowback water of oil and gas development on federal lands. IPAA believes that the provisions of this rule are excessive and make operating on federal lands less appealing. States have been effectively regulating oil and natural gas production in these same areas without the burdensome requirements proposed in the BLM rule. Additionally, the proposed rule undoubtedly creates additional time delays and uncertainty into a federal leasing process that is rapidly becoming unappealing to America's oil and natural gas producers.

America's oil and natural gas producers are proud to provide the nation with the resources to fuel our economy and economic prosperity. The BLM's proposed rule for well stimulation activities on federal lands has the potential to significantly impact the ability of independent oil and natural gas producers to operate on those areas. Given the enormous implications the proposed rule could have on American oil and gas production, IPAA believes it is reasonable for DOI to provide an additional 90 days to fully evaluate this proposed rule.

Thanks you for your attention to this request.

Sincerely,

Barry Russell
President & CEO
Independent Petroleum Association of America