



Submitted via email

June 18, 2012

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Jackson:

The Independent Petroleum Association of America (IPAA) requests that the Environmental Protection Agency (EPA) extend the comment period for an additional 90 days on the draft permitting guidance for oil and natural gas hydraulic fracturing activities using diesel fuels. The proposed rule was issued on May 10, 2012 and the comment period is currently set to close on July 9, 2012.

The EPA draft permitting guidance for oil and natural gas hydraulic fracturing activities using diesel fuels is both complex and nuanced. While IPAA continues to believe that federal involvement in the usage of diesel fuels in hydraulic fracturing operations should be addressed in a formal rulemaking process that considers the effectiveness of state regulation of hydraulic fracturing under their well construction standards, IPAA believes additional time is needed to fully analyze the implications of the proposed permitting guidance.

America's oil and natural gas producers are proud to provide the nation with the resources to fuel the economy and economic prosperity. EPA's draft permitting guidance for oil and natural gas hydraulic fracturing activities using diesel fuels has the potential to impact the operations of independent oil and natural gas production operations across the country in a material way. Given the enormous implications the proposed rule could have on American oil and natural gas production, IPAA believes it is reasonable for EPA to provide an additional 90 days to fully evaluate this proposed guidance.

Thank you, in advance, for your consideration of this request.

Sincerely,

Lee O. Fuller
Vice President of Government Relations
Independent Petroleum Association of America

CC: Chitra Kumar