



June 13, 2016

*Submitted via electronic mail*

Mr. David Olsen  
Regulatory Program Manager  
U.S. Army Corps of Engineers  
441 G Street NW  
Washington, DC 20314-1000

Re: Proposal to Reissue and Modify Nationwide Permits  
Comment Deadline Extension Request

Dear Mr. Olsen:

The American Exploration & Production Council (“AXPC”) and the Independent Petroleum Association of America (“IPAA”) were pleased to see the publication of the *Proposal to Reissue and Modify Nationwide Permits* (“Proposal”) in the federal register on June 1, 2016, (Volume 81, Number 105) and respectfully request a 60-day extension to the comment deadline provided in the notice.

While AXPC and IPAA understand the desire of the U.S. Army Corps of Engineers (“USACE”) to advance the public process, as the 2012 Nationwide Permits expire on March 18, 2017, AXPC and IPAA believe that in order to adequately address how, “the 2015 revisions to the definition of ‘waters of the United States’ might affect the applicability and efficiency of the proposed [Nationwide Permits] NWP,” AXPC and IPAA need additional time for their members to thoughtfully consider and respond to this proposed rulemaking. Further, USACE is seeking comment on several additional topics including, “whether to retain the ½-acre limit that has been imposed on certain NWPs,” and, “on whether the [Pre-Construction Notification] PCN thresholds for specific NWPs should be changed to improve the efficiency of the NWP Program while maintaining strong protection of the aquatic environment.” Other items requiring review include the USACE draft National Environmental Policy Act decision documents and the USACE District Office’s regional conditions. The breadth and depth of these issues for which USACE is seeking comment requires more than the allotted 60-day comment period to meaningfully supply USACE with the information it seeks from public commenters.

AXPC and IPAA look forward to participating in this important public process and appreciate USACE’s consideration on this 60-day comment extension request to insure it is provided with meaningful and practical comments.

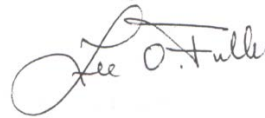
AXPC is a national trade association representing 28 of America's premier independent natural gas and oil exploration and production companies. AXPC's members are leaders in developing and applying the innovative and advanced technologies necessary to explore for and produce crude oil and natural gas, and that allow our nation to add reasonably priced domestic energy reserves in environmentally responsible ways.

IPAA is a national trade association representing the thousands of independent crude oil and natural gas explorers and 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 that 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.

Respectfully Submitted,



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