



May 17, 2013

The Honorable Sally Jewell
Secretary
Department of Interior
1849 C St. NW
Washington, D.C. 20240

Dear Secretary Jewell:

The Independent Petroleum Association of America (IPAA) represents 9,000 independent oil and gas companies across the United States. We recently reviewed your "Supplemental Notice of Proposed Rulemaking and Request for Comment" on The Department of the Interior's proposed Oil and Gas, Hydraulic Fracturing on Federal and Indian lands rule which you published on your website on May 16, 2013. The suggested comment period posted in this rule only affords the public 30 days to make recommendations on this proposal. We are concerned that this does not provide enough time to reanalyze the rule and provide sufficient comment.

As you know, the IPAA has been concerned with this effort from its inception; we believe this rule solves no existing problem or gap in state regulatory schemes. While we understand that your agency has made changes to the rule since its original release in May 2012, we believe that our subject matter experts from member companies will need to reevaluate the rule in its entirety in order to fully understand the impacts on our member companies.

IPAA respectfully requests that the comment period for the supplemental notice be no less than 120 days from the date of publication in the Federal Register. Additionally, we respectfully request a response to this request within 14 days of the publication in the Federal Register to ensure we are able to meet the comment deadline. If you have any questions, please contact Dan Naatz of IPAA at 202-857-4722.

Thank you,

Barry Russell
President
IPAA