



January 10, 2014

The Honorable Sally Jewell
Secretary of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Jewell:

The Independent Petroleum Association of America (IPAA) requests an extension of the Fish and Wildlife Services' (FWS) listing decision for the Lesser Prairie-Chicken (LPC) from the current March 31, 2014 deadline until June 11, 2014. IPAA represents our nation's independent producers of oil and natural gas. With companies operating in more than 30 states, IPAA members are the primary producers of America's oil and natural gas resources. IPAA's members develop 95 percent of American oil and natural gas wells, account for 85 percent of American natural gas production and 54 percent of American oil production.

IPAA is opposed to the listing of the LPC as an endangered species and believes the best scientific and commercial information requires a determination that a listing decision is not warranted. IPAA and our members have publicly stated our concerns with the proposed listing of the LPC directly to FWS Director Dan Ashe and other officials at the Department of the Interior on numerous occasions. The existing conservation efforts designed to protect the LPC and continued on-the-ground measures on federal, state and private lands are sufficient to protect the bird.

Given the complex nature of this entire matter, there is no need to rush a listing decision of the LPC. IPAA believes an extension of the March 31, 2014 listing decision deadline until June 11, 2014 is warranted. This extension would allow additional on-the-ground conservation efforts to be implemented and developed. IPAA supports any and all plans that allow the FWS to ultimately get to a no listing decision and post listing safeguards. The extension would be in accordance with statutory requirements of a one-year listing decision and a six-month extension from the proposed listing that was published in the Federal Register on December 11, 2012. Given the detailed nature of the decision, the exemplary efforts of producers on the ground to develop reasonable conservation solutions and the need for transparency and access to information, IPAA believes there is no need for the FWS to unnecessarily limit public participation in the process.

Thank you for your attention to this important request. We will send a copy of this letter to Director Ashe and will also be filing this letter as part of IPAA's official comments to the FWS on the LPC listing.

Sincerely,

Barry Russell
President & CEO
Independent Petroleum Association of America

cc: Director Dan Ashe