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February 8, 2016

Neil Kornze, Director  
Bureau of Land Management  
U.S. Department of the Interior  
1849 C Street NW Washington, DC 20240

Re: Request for Extension of Comment Period RIN: 1004-AE14  
Waste Prevention, Production Subject to Royalties, and Resource Conservation, 81 Fed. Reg.  
6616 (Feb. 8, 2016)

Dear Mr. Kornze:

The American Petroleum Institute (“API”) respectfully requests that the Bureau of Land Management (“BLM”) extend the comment deadline for the captioned proposed rule. API asks that BLM extend the public comment period for this proposal for at least an additional 30 days, until May 9, 2016.

API is a national trade association representing over 640 member companies involved in all aspects of the oil and natural gas industry. API’s members include producers, refiners, suppliers, pipeline operators, and marine transporters, as well as service and supply companies that support all segments of the industry. API member companies are leaders of a technology-driven industry that supplies most of America’s energy, supports more than 9.8 million jobs and 8 percent of the U.S. economy, and since 2000, has invested nearly \$2 trillion in U.S. capital projects to advance all forms of energy, including alternatives.

The existing 60-day public comment period provides a limited window for review and comment on this extensive, detailed and highly technical proposed rule. Such a limited review period does not provide an adequate opportunity for the public to prepare substantive analysis, review relevant data, and draft meaningful comments on the proposal.

BLM seeks comments on a wide range of topics related to the production of oil and natural gas. If the proposal addressed only venting and flaring of natural gas, the complexity of that issue alone would warrant an extended comment period. The proposal goes significantly farther, however, to include many other highly technical topics, including leak detection, pneumatic devices, storage tanks, liquids unloading, and well completions. Even more, the proposed rule would change royalty regulations that are fundamental to oil and gas leasing on federal and Indian lands. These issues are complex and intertwined not only with each other, but also with the numerous other regulatory revisions that BLM and the Office of Natural Resources Revenue have recently proposed (or are expected to propose) as well as the

Environmental Protection Agency's pending changes to the New Source Performance Standards for the oil and natural gas industry.

Furthermore, the proposed rule could impose new costs on production and diminish incentives for leasing of Federal and Indian lands. The energy renaissance taking place in our country as a result of increased oil and natural gas production supports millions of jobs, generates billions of dollars in Federal and state revenue each year, and has made our nation more energy secure. A proposed rule that could have detrimental effects on this critical source of Federal revenue should be subject to an adequate opportunity for public review and comment.

Given the technical nature of these rules and their potential impacts, the public comment period should be extended a suitable length of time. API respectfully requests that, at a minimum, the comment date for the proposed rules be extended for at least an additional 30 days, to May 9, 2016. Such an extension will better ensure that the public has an opportunity to meaningfully review this matter and provide comments that will be of value to BLM in the agency's efforts to avoid waste and ensure conservation of resources.

Should you have any questions, please contact the undersigned at 202.682.8057, or via e-mail at [rangerr@api.org](mailto:rangerr@api.org).

Thank you for considering this request.

Very truly yours,

A handwritten signature in cursive script that reads "Richard Ranger".

Richard Ranger  
Senior Policy Advisor  
Upstream and Industry Operations  
American Petroleum Institute

cc: Mike Pool  
Michael D. Nedd