



November 5, 2012

The Honorable Daniel Ashe
Director
Fish and Wildlife Service
1849 C Street, N.W.
Washington, D.C. 20240

Dear Director Ashe:

The Independent Petroleum Association of American (IPAA) writes to express its concerns regarding the continued lack of transparency with respect to timing and plans for listing decisions on candidate species under the Endangered Species Act (ESA) as part of implementation of settlement agreements between the Fish and Wildlife Service and Center for Biological Diversity and Wild Earth Guardians.

As you know, in September of 2011, the Federal District Court approved settlements between Fish and Wildlife Service, Wild Earth Guardians and Center for Biological Diversity. By 2016, FWS must complete review of 250 candidate species for final listing and complete other actions on listing, critical habitat petitions, and other actions for over 1000 species.

IPAA understands that FWS is obligated to meet certain deadlines as part of the court approved settlement; yet there is very little transparency afforded to the public on which species are coming up for review. The pure depth and breadth of these settlement agreements could harm our membership and create uncertainty in the development of domestic oil and natural gas.

While independent oil and natural gas producers range in size from one-or-two person private companies up to larger, publicly traded firms, the average independent producer has been in business for 26 years, employs 11 full-time and three part-time people. Independent oil and natural gas producers drill 95 percent of the wells in the United States each year. As you know, data regarding ESA decisions typically requires a considerable amount of time and providing certainty and transparency would allow our membership to make informed decisions regarding these species.

Respectfully, IPAA requests that the FWS host a public forum to discuss the current review of species under consideration under the settlement agreements as well as discuss its work plan moving forward through 2016.

Sincerely,

Barry Russell
President & CEO