

February 7, 2005

The Honorable Gale Norton
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Secretary Norton:

As representatives of the Nation's natural gas and oil industry, the National Ocean Industries Association, the Independent Petroleum Association of America, the US Oil & Gas Association, the Domestic Petroleum Council, the International Association of Drilling Contractors, the American Petroleum Institute, and the Natural Gas Supply Association are writing to express our concerns regarding the next five year Outer Continental Shelf leasing program for 2007-2012. We ask that the Department begin the request for comments solicitation by seeking information for all planning areas, as required by the Outer Continental Shelf Lands Act and the National Environmental Policy Act.

We represent thousands of companies, both majors and independents, engaged in all sectors of the U.S. oil and natural gas industry, including exploration, production, refining, distribution, marketing, equipment manufacture and supply, and other diverse offshore support services. Preparation of a plan governing the management of the natural gas and oil resources on the Outer Continental Shelf is, therefore, of critical interest to us.

There is great concern about energy supply in this country, by the United States Congress through various pieces of legislation, by your Administration through the Report of the National Energy Policy Development Group, and by statements from Chairman Greenspan. The Department of the Interior now has the opportunity to begin an open, public process, guided by statute, that could provide access to increased supplies of natural gas and oil for the United States. We urge you to begin by keeping all options on the table and seeking the broadest possible range of information and input.

Section 18 of the Outer Continental Shelf Lands Act enumerates the specific factors that must be analyzed and considered in deciding the timing and location of lease sales in the leasing

program. We do not believe it is possible to comply with this section of the statute if the agency does not solicit and gather information about all the Outer Continental Shelf regions during the initial request for comments.

Thank you for your consideration of our concerns on this matter. If you have any questions or we can provide any additional information, please do not hesitate to contact Kim Harb at 202-347-6900.

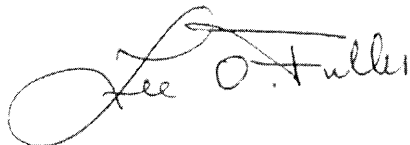
Sincerely,



National Ocean Industries Association



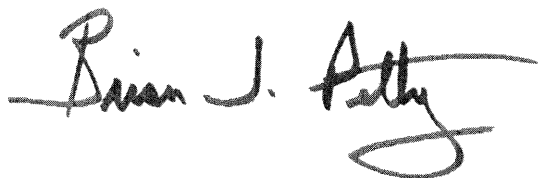
American Petroleum Institute



Independent Petroleum Association of America



US Oil & Gas Association



International Association of Drilling Contractors



Domestic Petroleum Council



Natural Gas Supply Association