



June 2, 2017

The Honorable Ryan K. Zinke
Secretary of the Interior
1849 C Street NW
Washington, DC 20240

Re: Nomination for Royalty Policy Committee Membership, Docket No. ONRR-2012-0003,
82 Fed. Reg. 16222 (April 3, 2017)

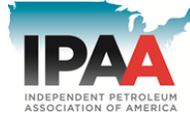
Dear Mr. Secretary:

The American Petroleum Institute (“API”), the Council of Petroleum Accountants Societies (“COPAS”), the Independent Petroleum Association of America (“IPAA”) and Western Energy Alliance (“Alliance”) support the Department of the Interior’s decision to re-establish the Royalty Policy Committee (RPC) Federal Advisory Committee and appreciate the opportunity to provide the following input into the Committee nomination process. Collectively, we represent thousands of companies involved in all aspects of the oil and natural gas industry. Our members operate throughout the United States and represent all of the regional interests of the Industry Sector.

API represents over 625 oil and natural gas companies, 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 industry has paid more than 150 billion dollars in royalty revenues to the federal treasury.

COPAS is a professional organization comprised of the oil and gas industry’s most knowledgeable and influential accounting professionals. COPAS has operated as a non-profit entity for 50 years and has over 4,000 members with 24 societies in the United States and Canada. The societies have developed standardized documents in areas such as joint interest accounting, auditing, production volume and revenue accounting, and financial reporting and tax matters. Additionally, many COPAS members are responsible for the filing of the Federal royalty reports to the Office of Natural Resources Revenue.

IPAA is the national association representing the thousands of independent crude oil and natural gas explorer/producers in the United States. It also operates in close cooperation with 44 unaffiliated independent national, state and regional associations, which together represent thousands of royalty owners and the companies which provide services and supplies to the domestic industry. IPAA is dedicated to ensuring a strong, viable domestic oil and natural gas industry, recognizing that an adequate and secure supply of energy is essential to the national economy.



Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. The Alliance represents independents, the majority of which are small businesses with an average of fifteen employees.

The RPC has previously been a constructive forum for open engagement on royalty and revenue issues and provides an opportunity for all stakeholders to work with the ONRR in its efforts to improve and strengthen the royalty collection program. According to the Federal Register Notice, the RPC will consist of up to 28 members, of which up to 6 members will represent “various mineral and/or energy stakeholders in Federal and Indian royalty policy.”

The Oil and Gas Industry is made up of a variety of companies – from the largest publically traded corporations to the smallest independents. Its activities include the exploration and production of both onshore and offshore resources as well as development from both Federal and Indian lands. We believe that RPC membership must be selected in such a way as to fully represent the great diversity within the Oil and Gas Industry. Accordingly, we strongly encourage the Department of the Interior to fill at least 4 of the 6 Industry member positions with company and trade association representatives from the oil and gas industry in order to properly receive input reflective of all industry perspectives.

Thank you for your consideration, and we look forward to engaging with the Department as the RPC process moves forward. If you have any question related to these comments please contact Emily Hague (202) 682-8260, Hague@api.org.

Sincerely,

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