



October 4, 2006

NEPA Modernization (CE)  
Attn: Associate Director for NEPA Oversight  
722 Jackson Place, NW  
Washington, DC 20503

**Re: The National Environmental Policy Act – Guidance on Categorical Exclusions (Notice and request for Comments, FR September 19, 2006): Request for Extension of Time to File Comments**

This is to request a 30-day extension of time to file comments in response to the Council on Environmental Quality's September 19, 2006 notice and request for comments on proposed "...guidance to Federal agencies for establishing and for using categorical exclusions in meeting their responsibilities under the National Environmental Policy Act (NEPA)...".

The request is being made by the Domestic Petroleum Council (DPC), the Independent Petroleum Association of America (IPAA), the Independent Petroleum Association of the Mountain States (IPAMS), and the American Petroleum Institute (API) which represent exploration and production companies with a significant interest in the use of categorical exclusions (CXs) – and whose members apply for most of the Intermountain Region permits to drill for natural gas and oil that are subject to NEPA requirements and CX guidance.

Because of the issues raised in the notice, we are seeking to gather input from our members on how those issues should best be addressed. A short extension of the comment period would significantly improve the quality of that input since, during the current intense energy exploration and production time, it is many of the same people who are involved in day-to-day operations, permitting and regulatory compliance who are being asked for their views.

Thank you for considering our request.

Sincerely,

William F Whitsitt  
President  
DPC

Barry Russell  
President  
IPAA

Marc Smith  
Executive Director  
IPAMS

Robert Greco  
Group Director  
Upstream and Industry Operations  
API