



**Industrial Energy Consumers of America**  
*The Voice of the Industrial Energy Consumers*

---

1155 15<sup>th</sup> Street, NW, Suite 500 • Washington, D.C. 20005  
Telephone 202-223-1420 • Fax 202-530-0659 • [www.ieca-us.org](http://www.ieca-us.org)

May 21, 2013

The Honorable Sally Jewell  
Secretary  
U.S. Department of the Interior  
1849 C Street, NW  
Washington D.C. 20240

***RE: Oil and Gas; Hydraulic Fracturing on Federal and Indian Lands Rule***

Dear Secretary Jewell:

On behalf of the Industrial Energy Consumers of America (IECA), we urge the Bureau of Land Management (BLM) to extend the comment period for the Oil and Gas, Hydraulic Fracturing on Federal and Indian Lands rule to 120 days, in order to allow for sufficient time to develop and coordinate extensive comments alongside industry stakeholders. IECA remains very concerned that the BLM is continuing to pursue this regulation when they have not provided any scientific or other data indicating the existence of issues arising from lack of regulation.

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.3 trillion in annual sales, over 1,500 facilities nationwide, and with more than 1.7 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemical, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, brewing, and cement.

IECA believes new federal regulation on federal lands is not needed and will slow natural gas and oil production just when it is needed most – impacting manufacturing jobs and competitiveness. Rather than force an unnecessary, one-size-fits-all regulatory regime on top of carefully crafted state-specific programs, BLM should instead adopt existing state programs and regulations on Federal lands. A Federal, one-size-fits-all approach fundamentally ignores local and regional differences among operations in different regions and states, in contrast with state regulations that are highly adaptive and effective. States have a successful record of protecting the environment and public health, while simultaneously facilitating oil and gas development and promoting economic growth.

IECA member companies have good reason to be concerned. In the period from 2000 to 2005, natural gas prices doubled and tripled because demand exceeded supply. We remember that the BLM's permitting system, heavy with increased bureaucracy and inadequate staffing,

resulted in thousands of drilling permit backlogs. Wells did not get drilled, natural gas and oil did not get produced and the manufacturing sector and the economy as a whole suffered. There were plenty of natural gas reserves and the federal government was directly responsible for the failure to allow producers access to the natural gas in order to produce it for us, the consumer.

Simply stated, the rule is a solution in search of a problem that does not exist.

Sincerely,

Paul N. Cicio  
President

cc: The Honorable Ron Wyden  
The Honorable Lisa Murkowski  
The Honorable Doc Hastings  
The Honorable Edward Markey  
The Honorable Fred Upton  
The Honorable Henry Waxman