ConocoPhillips
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August 19, 2013
Department of Natural Resources,
Division of Oil and Gas
ATTN: Mr. Bob Pawlowski
550 West 7th Avenue, Suite 1100
Anchorage, Alaska 99501-3560
Dog.comments@alaska.gov
Fax (907) 269-8938

RE: Request for Extension of Comment Period;
Proposed Changes to Oil and Gas Regulations 11 AAC 83,
Dated July 12, 2013

Dear Mr. Pawlowski:

ConocoPhillips Alaska, Inc. ("CPAI") requests that the Department of Natural Resources ("DNR") extend the comment period for the "Proposed Changes to Oil and Gas Regulations 11 AAC 83" beyond the current August 19, 2013, deadline, and include the opportunity for a workshop during which DNR and industry can clarify the intent and potential implications of the draft regulations.

CPAI's review of the proposed regulations has identified potentially far-reaching impacts to current oil and gas operations as well as future exploration activities. Our ability to provide clear comments has been hampered, however, by significant uncertainty about the intended scope and effect of the proposed regulations. Additional time would permit CPAI to more specifically evaluate and comment on, for example, the operational and planning impacts to existing unit agreements, unit plans of operations (to include the amendment process for such plans), leases, and general permit practices. Due to such potential effects, and a desire to avoid commenting on all potential interpretations of the proposed regulations, CPAI requests the extension and workshop to fully and accurately understand DNR's objectives and have the opportunity to provide clear comments for the benefit of both the state and industry.

CPAI appreciates the opportunity to comment and looks forward to participating in future discussions on the proposed regulations.

Sincerely,

David W. Brown
Land Manager