

DOMESTIC PETROLEUM COUNCIL

April 7, 2006

Ms. Renee Orr
5-Year Program Manager
Minerals Management Service (MS-4010)
Room 3120
381 Elden Street
Herndon, VA 20170

Re: Comments on the Draft Proposed 5-Year Program for 2007-2012;
And, Scoping Comments on the EIS for the 5-Year Program for 2007-2012

Dear Ms. Orr:

This letter is to provide additional views of the Domestic Petroleum Council (DPC) to supplement those filed earlier in the current 5-Year Program for 2007-2012 planning process.

In our letter of October 11, 2005, the DPC urge that the next 5-Year Outer Continental Shelf (OCS) Leasing Program include a continued robust schedule of leasing in all areas not currently under legislated or administrative moratoria – and allow sales in areas that may be opened by Congress and/or the President prior to or during the 2007-2012 Program period. In preparation for such a Program, the DPC urged the Minerals Management Service (MMS) to complete all necessary advance environmental and other studies and analyses so that leasing in any such available areas can be carried out expeditiously.


The Draft Proposed Program provides significant movement toward the goals we articulated. However, more must be done. As you will see in the joint association comments being filed separately and which include detailed comments and recommendations, we are especially concerned that the Draft Program does not include adequate study and preparation for potential sales in areas that may be brought out of moratoria status in the 2007-2012 Program period. More specifically, in addition to environmental and other work proposed in non-moratoria areas, and off the Coast of Virginia (as detailed in the joint association comments), we emphasize the importance of the Program EIS including additional Eastern Gulf of Mexico and Mid- and South Atlantic areas.

Finally, we take specific exception to the concept of arbitrary "buffers" or zones off any state's coast within which no leasing should occur. There are certainly areas, including marine sanctuaries or other such places, in which energy development may not be compatible with other values or uses. Processes exist to define them. But with today's energy needs, the technology with which exploration and production occurs and the outstanding environmental record of our industry, arbitrary no-leasing buffers are themselves not compatible with the national interest.

As an example, the proposed buffer for the State of Florida could prevent adding very important future increments of supply for consumers (including residents of Florida -- a state that has seen one of the highest natural gas demand increase trends in the past, that is expected to see that trend continue* and that currently benefits from very significant reliable, safe, oil and gas production well within 100 miles of its coast.)

Thank you for considering our views, and for the work the MMS is doing to improve the nation's energy future.

Sincerely,



William F. Whitsitt
President

* Sources: Energy Information Administration. *Natural Gas Consumption by End Use* (2006); National Petroleum Council. *Balancing Natural Gas Policy: Fueling the Demands of a Growing Economy* (2003)