



AXPC

AMERICAN EXPLORATION & PRODUCTION COUNCIL

December 5, 2013

Cynthia A. Znati, Ph.D
Chemical Engineer
Hazardous Materials Division
U.S. Coast Guard (CG-ENG-5)
2100 2nd Street, S.W., Stop 7126
Washington, DC 20593

RE: Comments on the U.S. Coast Guard's Policy Letter for Carriage of Conditionally Permitted Shale Gas Extraction Waste Water in Bulk (Docket No. USCG-2013-0915)

Dear Dr. Znati,

AXPC is a national trade association representing 32 of America's premier independent natural gas and oil exploration and production companies. The mission of AXPC is to constructively and thoughtfully work for sound energy, environmental, and related domestic public policies that encourage the responsible exploration, development and production of natural gas and oil to meet the needs of consumers and fuel our economy.

On October 30, 2013, the U.S. Coast Guard (USCG) published a notice in the Federal Register of its proposed policy letter concerning the carriage of shale gas extraction waste water in bulk via barge. A 30-day public comment period was given in the notice with a November 29, 2013 deadline which was informally extended to December 6, 2013.

The proposed USCG policy letter asks for public comments on several issues related to establishing requirements for analysis and monitoring of shale gas extraction waste water. AXPC supports a sound and well-reasoned policy for the bulk transport of shale gas waste water by barge; however, AXPC is concerned whether the requirements proposed in the policy letter are consistent with treatment and classification of shale gas extraction waste water under other federal statutes and regulations.

AXPC fully supports the comments on the Policy Letter that were submitted by the Independent Petroleum Association of America, the Independent Oil and Gas Association of West Virginia, the Pennsylvania Independent Oil & Gas Association, the Kentucky Oil & Gas Association and the Ohio Oil and Gas Association of America and trusts that the USCG will properly consider such comments as it is developing the final Policy for Carriage of Conditionally Permitted Shale Gas Extraction Waste Water in Bulk."

AXPC greatly appreciates the role and commitment of the men and women that serve in the USCG. If you have any questions or need additional information, please feel free to contact me at AXPC.

Respectfully yours,

A handwritten signature in blue ink that reads "V. Bruce Thompson". The signature is written in a cursive style with a large, stylized "V" at the beginning.

V. Bruce Thompson
President
American Exploration and Production Council
1350 Eye St. NW
Suite 510
Washington, DC 20005

(202) 652-2359
E-mail: info@axpc.us