



AMERICAN PUBLIC GAS ASSOCIATION

September 11, 2009

Ms. Renee Orr
Mr. James F. Bennett
U.S. Minerals Management Service, MS 4010
381 Elden Street
Herndon, Virginia 20170

RE: Support for the 2010-2015 Oil & Gas Leasing Plan in the Outer Continental Shelf

Dear Ms. Orr and Mr. Bennett:

On behalf of the American Public Gas Association (APGA), I express our strong support for the Five-Year Plan's Draft Proposed Program (DPP) developed by the U.S. Minerals Management Service (MMS) for lease sales from 2010 to 2015 in the Outer Continental Shelf (OCS). APGA has been a strong proponent of opening up areas in the OCS to responsible natural gas development, including those areas previously under Congressional and Administrative moratoria.

APGA is the national association for publicly-owned natural gas distribution systems. There are approximately 1,000 public gas systems in 36 states and over 720 of these systems are APGA members. Publicly-owned gas systems are not-for-profit, retail distribution entities owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities.

APGA commends the MMS for the development of a proposed plan that would open many new areas in the OCS to gas production. Specifically, APGA supports the proposed offering of leases in four areas off of Alaska, two areas off of the Pacific coast, three areas in Gulf of Mexico, and three areas off of the Atlantic Coast. Many of these areas were formerly protected by congressional and executive restrictions prohibiting oil and gas development on the OCS.

A critical component of the solution to long-term affordable natural gas is increasing domestic supply through our abundant and untapped natural gas resources. As Congress considers climate change legislation, increasing natural gas supply becomes even more critical since it is expected that natural gas will play a critical role in reducing greenhouse gas emissions.

It is more important than ever that the federal government allow access to offshore energy resources as soon as all necessary environmental protections have been put in place. Federal offshore waters hold the greatest potential for finding and bringing new energy resources to market in the next 5 to 10 years. The MMS estimates that there is currently 420 trillion cubic feet of natural gas technically recoverable from all federal offshore areas. This amount alone is equivalent to almost 20 years consumption at our current demand.

Providing for a sensible yet effective energy policy that safely utilizes U.S. resources will help U.S. industries, strengthen national security and supply, and spur economic growth. If we are to fully utilize clean domestically produced natural gas at long-term affordable prices, our energy policy must not take significant domestic supplies, such as those available in the OCS, off the table. APGA is pleased to see that the MMS has taken a step in the right direction by offering new lease opportunities in the North Atlantic, Middle Atlantic, South Atlantic, and Pacific.

I thank you in advance for your consideration of these comments.

Sincerely,



Bert Kalisch
President & CEO