



May 3, 2010

Ms. Renee Orr  
5-Year Program Manager  
Department of the Interior, Leasing Division  
381 Elden Street, MS-4010  
Herndon, VA 20170-4817

**By Email: Renee.Orr@mms.gov**

**RE: Finalize the 2007-2012 Five-Year Outer Continental Shelf Program & Open ALL US waters for Development as part of the 2012-2017 Five-Year Program**

Dear Ms. Orr:

We write to you today regarding the development of outer continental shelf crude oil. Please make these comments part of the public record.

Since 1950, the New England Fuel Institute has represented the home heating industry in the New England region and throughout the Northeast. Today, NEFI represents over 1,000 home heating fuel retailers (including heating oil, kerosene and propane) and related services companies, most of which are small, multi-generational family owned- and operated-businesses. These companies believe that domestic energy production is essential to national energy security and stability.

The home heating oil industry is currently transitioning to a cleaner, ultra-low sulfur fuel that will utilize cutting edge efficiency technologies and biofuels in order to dramatically reduce petroleum consumption. The result will be an environmentally conscience fuel product that is also mindful of environmental and national security concerns. But as we transition, a safe, reliable source of domestic fossil fuels will be required to create supply and price stability.

Following President Obama's recent announcement regarding our national energy policy, we are writing to urge that the Minerals Management Service (MMS):

1. move forward expeditiously with the remanded 2007-2012 Five-Year Outer Continental Shelf Oil and Gas Leasing Program to ensure timely and appropriate action on existing leases in 2010; and that it
2. open ALL water in the Outer Continental Shelf (OCS) as part of its initial Scoping Process for the 2012-2017 Five-Year Program for leasing.

Following the President's March 31<sup>st</sup> call for expanded offshore development, any further delays of the 2007-12 program directly hinder efforts to: 1) sustain and promote job growth during a period of high national unemployment; 2) stabilize energy prices, while responsibly developing affordable, commonsense domestic energy resources; 3) ensure additional federal offshore

revenues for state and federal governments; and 5) reduce America's dependence on foreign energy supplies.

Looking ahead to the 2012-2017 Five-Year Program, it is vital that our nation's abundant energy resources be fully utilized. With first-time claims for unemployment benefits nearly reaching the half-million mark this year and the national economy struggling to regain its global competitive edge, it is important to bring our vast offshore oil reserves back online.

Furthermore, the costs of not developing additional U.S. reserves would put a huge burden on an already struggling American economy. In fact, not developing our offshore natural resources is projected to cost energy intensive industries nearly 13 million jobs and cumulatively decrease the nation's real disposable income by \$2.34 trillion, according to a report issued by the National Association of Regulatory Utility Commissioners.

As an organization representing retail home heating fuel marketers and their consumers, who are adversely impacted by volatile energy prices, we believe that it is essential for MMS to fulfill President Obama's promise of realistically meeting our energy needs through expanded (and expedited) development of our natural resources.

We must work together to create a robust national energy policy and secure our energy and economic future. Given lessons learned from the most recent Mexican Gulf oil spill, we can also learn oil recovery practices and methods that can make domestic energy production cleaner, more reliable and safer for our consumers, the environment and the broader economy.

The recent accident in the Gulf should not be a prohibitive development, but rather a call to arms that our domestic energy supplies demand smart and responsible exploration, development and extraction technologies, which can and should be realized as our economy transitions to the "clean and green" fuels of the future that we so desperately need.

Sincerely,

The New England Fuel Institute