



Colleen Naff
Senior Counsel
CNAEP Legal
Houston Shared Services

Negotiations & Legal
Chevron North America Exploration and
Production Company, a division of
Chevron U.S.A. Inc.
1400 Smith Street, Room 6129
Houston, TX 77002
Tel 713 372 9023
Fax 713 372 9052
colleen.naff@chevron.com

September 19, 2013

Armand Southall
Regulatory Specialist, ONRR
Office of Natural Resources Revenue
Building 85, Room A-614
Denver Federal Center
West 6th Ave and Kipling St.
Denver, Colorado 80025

Submitted via Federal Express

Re: Docket No. ONRR-2011-0017; 1012-AA08
Comments of Chevron U.S.A. Inc. on Proposed Rule: Clarification of Appeal Procedures

Dear Mr. Southall:

Chevron U.S.A. Inc. (Chevron) appreciates the opportunity to comment on the Office of Natural Resources Revenue (ONRR) and the Office of Hearings and Appeals (OHA) Proposed Rule issued July 22, 2013 entitled "Clarification of Appeal Procedures." 78 Fed. Reg. 43843.

Chevron is a member company of the American Petroleum Institute ("API"). As such Chevron endorses and supports the comments filed by API on the Proposed Rule and incorporates them by reference.

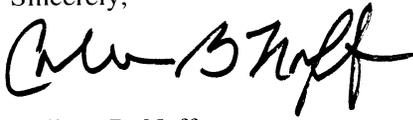
In particular, Chevron is concerned about new paragraph 2(vi) that would be added to both 30 C.F.R. § 1290.102 and 43 C.F.R. § 4.903 excluding from the definition of order "[a]ny correspondence that does not include the right to appeal in writing." "Any correspondence" is overly broad and leads to confusion. Does this exclude (1)(i) and (1)(ii) under the definition of Order? Whether ONRR believes that certain correspondence is appealable or not should be specifically stated in the correspondence. Otherwise, Chevron would be left in the position of calling to verify whether the information regarding appeals was intentionally left out. ONRR notes that this change will reduce the number of ineligible appeals; however, as written, Chevron anticipates it will increase the number of inquiries.

The Proposed Rule would amend § 1290.108(b) to extend ONRR's answer period before the IBLA from 60 days (30 days, with an automatic 30 day extension) to 90 days (60 days, with an automatic 30 day

extension). ONRR has already accumulated the information necessary to issue an order or demand so there should not be the need for additional time to assemble the record.

Chevron strongly urges ONRR to revise this proposed rule before issuing a Final Rule. Chevron is committed to working with ONRR to establish clear appeals procedures that are fair to all parties.

Sincerely,

A handwritten signature in black ink, appearing to read "Colleen B. Naff". The signature is written in a cursive, flowing style.

Colleen B. Naff