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Amendments to Service of Official Correspondence

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Comment from Mark Cox,

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General Comment

September 23, 2013

Dear ONNR:

The underlying premise of electronic delivery of messages, particularly without receipt notification, is very unacceptable and somewhat disturbing.

Employees come and go in addition to changing job functions within the company. As these employees move, leave the company and change job functions we are typically not able to receive electronic communications which may be sent to them. In fact such notices may even be rejected by our e-mail system.

I verified with the company technology department and they informed me that during the first quarter of 2013, 82.3% of the e-mails sent to valid employee addresses were never submitted to the employees due to the spam filtering system. That means that only 17.7% were valid and delivered e-mails. This fact alone should be enough to understand how this rule will have a significant adverse impact on companies.

Employees have no way to see what e-mails were blocked or filtered and therefore we have no way to verify that they ever received them. We also do not have any method to receive e-mails that were sent to employees that are no longer employed with the company.

I currently have an employee that will soon go on maternity leave for eight weeks. Eight weeks is not within the current guidelines for a response to ONNR. We simply cannot be expected to respond to electronic messages submitted to employees particularly without an acknowledgement of receipt of such message.

Sarah Inderbitzin has made it clear that the industry will be subject to penalties for non-compliance with the rules and regulations. We simply cannot be placed in a position where we are scrutinized by others and subject to fines and penalties without proper receipt of notices.