

January 20, 2006

VIA FIRST CLASS MAIL  
and E-MAIL ([ieed@bia.edu](mailto:ieed@bia.edu))

Section 1813 ROW Study  
Office of Indian Energy & Economic Development  
U.S. Department of the Interior  
1849 C Street, N.W.  
Mailstop 2749-MIB  
Washington, DC 20240

Re: Response to Request for Comments About Congressionally Mandated  
Study of Energy Rights-Of-Way on Tribal Lands

Dear Sir or Madam:

INGAA is a national, non-profit trade association that represents the interstate natural gas pipeline industry operating in the United States, as well as comparable pipeline companies in Canada and Mexico. INGAA's United States members, which account for virtually all of the natural gas transported and sold in interstate commerce, are regulated by the Commission pursuant to the Natural Gas Act ("NGA"), 15 U.S.C. §§ 717-717w.

INGAA responds herein to the Department of Interior's Notice of Request for Public Comment published in the *Federal Register* at 70 Fed. Reg 77178 (Dec. 29, 2005). The Notice seeks comment on the Department's proposed work plan regarding the Study of Energy Rights-of-Way on Tribal Lands that was mandated by Congress in Section 1813 of the Energy Policy Act of 2005.

The Study will address issues that are of great importance to INGAA and its membership, as well as to the energy consuming public, as the recommendations that will be included in the Study will be used by Congress to determine the appropriate standard for valuing pipeline rights-of-way on Native American lands. The standard that is ultimately chosen will, in turn, have a decided impact upon when and where pipeline infrastructure is constructed in this country and at what cost.

Due to its broad membership, INGAA has access to a significant amount of information that bears directly on the subjects that are to be addressed by the Study. In particular, INGAA believes that it can provide valuable assistance in the collection of data regarding historical rates of compensation. Also, given our membership's

January 20, 2006

Page 2

experiences, INGAA believes that, it can make a substantial contribution regarding the appropriate standards and procedures for determining fair and adequate compensation, and regarding relevant national energy transportation policies. Accordingly, INGAA requests that it be included in the scoping discussions discussed in the Notice, including pre-scoping and the later 2-day scoping meeting and further requests that it be included, as appropriate, in the working groups established after the 2-day scoping meeting.

INGAA appreciates this opportunity to comment. If you have any questions concerning any of the above, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to be "Sh. F. J.", written in a cursive style.