

From: Susan Ginsberg <sginsberg@ipaa.org>
Sent: Monday, April 26, 2010 6:52 PM
To: secretary <secretary@CFTC.gov>
Subject: Comments on Federal Speculative Position Limits
Attach: IPAA_comments_4_26_2010.pdf

Attached please find the comments of the Independent Petroleum Association of America on the Proposed Rule to implement Federal Speculative Position Limits for Referenced Energy Contracts and Associated Regulations.

Thank you.

Susan W. Ginsberg

Vice President

Crude Oil & Natural Gas Regulatory Affairs

Independent Petroleum Association of America

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IPAA Access Direct Blog: <http://www.ipaa.org/blog/>

IPAA represents the companies that drill 90 percent of America's onshore and offshore oil and natural gas wells.

April 26, 2010

Mr. David Stawick, Secretary
Commodity Futures Trading Commission
1155 21st Street, NW
Washington, DC 20581

RE: Comments of the Independent Petroleum Association of America
On Federal Speculative Position Limits for Referenced Energy
Contracts and Associated Regulations

Dear Mr. Secretary:

The Independent Petroleum Association of America (IPAA) represents the thousands of independent producers of American natural gas and oil. IPAA supports efforts to increase the transparency and oversight of derivatives markets. However, we urge caution in this proposed rulemaking, given the concurrent congressional efforts to enact financial reform.

As noted during the hearing leading to this rulemaking, a new rulemaking would be necessary should the CFTC be granted jurisdiction over the over-the-counter market. Given the resources to be invested by the CFTC and regulated industries in complying with new rules, IPAA suggests that the CFTC should refrain from imposing a new regulatory and compliance regime that might be supplanted shortly thereafter by the need for another rulemaking in light of added CFTC authority.

IPAA's caution should not be mistaken for resistance to greater transparency and oversight of commodity markets to ensure their proper functioning. IPAA views speculation as vital to the functioning of commodity markets. IPAA looks forward to working with the CFTC, following congressional action on financial reform, to ensure that aggregate speculative position limits across multiple markets prevent excessive speculation and support strong, competitive commodity markets.

Sincerely,



Lee O. Fuller
Vice President of Government Relations