

**From:** Currier, Patrick T. <pcurrier@hunton.com>  
**Sent:** Friday, September 24, 2010 5:04 PM  
**To:** dfdefinitions <dfdefinitions@CFTC.gov>  
**Cc:** rule-comments@sec.gov; OTCDefinitions <OTCDefinitions@CFTC.gov>  
**Subject:** Definitions Contained in Title VII of Dodd-Frank Wall Street Reform and Consumer Protection Act  
**Attach:** GPA\_ANOPRComments09\_24\_2010.pdf

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**Via Electronic Delivery**

Dear Secretary Stawick and Ms. Murphy:

On behalf of the Gas Processors Association ("GPA"), Hunton & Williams LLP hereby submits this letter in response to the request for comments set forth in the advanced notice of proposed rulemaking published in the *Federal Register* on August 20, 2010, addressing the definition of various key terms adopted in Title VII of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act").

The GPA is a non-profit trade organization founded in 1921 that represents 122 member companies with interests in the midstream industry. Midstream operations include gathering, compression, treating, processing, marketing and storage of natural gas, as well as fractionation, transportation, storage and marketing of natural gas liquids.

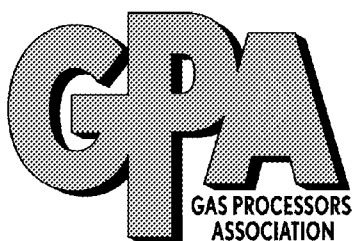
GPA appreciates the opportunity to submit these comments and looks forward to working with the Commodity Futures Trading Commission and Securities and Exchange Commission to further define and clarify these definitions as part of the formal rulemaking process implementing Title VII of the Act.

If you have any questions, or if GPA may be of further assistance, please do not hesitate to contact me at the number below or Mark Sutton, Executive Director of GPA, at 918.493.3872.

Respectfully submitted,

Patrick T. Currier  
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September 24, 2010

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

Ms. Elizabeth M. Murphy  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

**Re: Comments of the Gas Processors Association Regarding Definitions Contained in Title VII of Dodd-Frank Wall Street Reform and Consumer Protection Act (RIN 3235-AK65; 3038-AD06)**

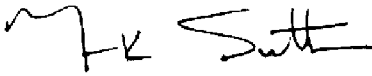
Dear Mr. Stawick and Ms. Murphy:

The Gas Processors Association (“GPA”) is a non-profit trade organization founded in 1921 that represents 122 member companies with interests in the midstream industry. Midstream operations include gathering, compression, treating, processing, marketing and storage of natural gas, as well as fractionation, transportation, storage and marketing of natural gas liquids. GPA’s membership accounts for approximately 92% of all NGLs produced in the United States and operate approximately 190,000 miles of domestic gas gathering lines. The operations of GPA members represent a significant portion of the total revenue of several states that are heavily reliant upon the oil and natural gas industry, including states such as New Mexico, Oklahoma, and Texas. The midstream industry is an essential link between energy producers and energy consumers providing American businesses and households with domestically produced energy.

GPA appreciates the opportunity to comment on the Advanced Notice of Proposed Rulemaking regarding the definitions of key terms outlined in the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). GPA and its members support the views expressed in the comments of the Coalition of Physical Energy Companies and the Working Group of Commercial Energy Firms with regard to their general interpretations, comments and principles.

We appreciate the opportunity to provide these comments and look forward to the formal rulemakings that will be issued to implement the Dodd-Frank Act.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Sutton". The signature is stylized with a large initial "M" and a long, sweeping underline.

Mark Sutton  
Executive Director