



August 11, 2017

Ms. Kelly Hammerle
National Program Manager
Bureau of Ocean Energy Management
45600 Woodland Road
Mailstop VAM-LD
Sterling, Virginia 20166

RE: Request for Information on 2019-2024 Outer Continental Shelf Oil & Gas Leasing Program

Dear Ms. Hammerle:

In response to the request for information on the development of the federal government's 2019-2024 offshore oil and gas leasing program, NACS supports developing a new leasing program and urges the inclusion of all 26 Outer Continental Shelf planning areas in the development of the Draft Proposed Program.

By way of background, NACS represents approximately 80% of retail fuel sales in the United States. NACS is an international trade association representing more than 2200 retail and 1600 supplier companies. NACS member companies do business in nearly 50 countries worldwide, with the majority of members based in the United States. In 2016, the U.S. Convenience industry, with approximately 2.7 million employees and 154,535 stores across the United States, generated \$549.9 billion in total sales – with motor fuels contributing 58% of those sales.

NACS strongly supports policies that ensure a stable domestic supply of energy. The convenience and fuel retailing industry is the closest facing entity to the consumer. Thus, it is in the best interest of the consumer to have low priced fuel, and NACS supports efforts to reduce volatility in the marketplace, increase supply, and encourage stability in the fuel supply chain. Developing a new leasing program and including all 26 Outer Continental Shelf planning areas in the development of the Draft Proposed Program achieves these goals.

Based on the latest government estimate, U.S. federal waters contain approximately 148 billion barrels of oil equivalent in undiscovered resources, or enough to meet the nation's oil and natural gas needs for more than a decade. These abundant resources – once developed - can help keep energy costs down, thereby helping consumers paying less at the gasoline pump. However, many of these resources are located in areas that are currently either completely or largely prohibited from development. For example, currently inaccessible areas in the Atlantic, Alaskan Arctic, and Gulf of Mexico are estimated to contain nearly five times the amount of oil and natural gas that the United States consumed in 2016.

Thank you for the opportunity to share the unique perspective of the convenience and fuel retailing industry. NACS respectfully urges the Bureau of Ocean Energy Management to include all offshore planning areas during this initial phase.

Sincerely,

A handwritten signature in blue ink that reads "Paige Anderson".

Paige Anderson
Director, Government Relations
NACS