November 22, 2005

VIA US Mail & Facsimile

Julia Souder
Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: West – Wide Energy Corridor Programmatic EIS

Dear Ms. Souder,

Anadarko Petroleum Corporation (APC) appreciates the opportunity to comment on the referenced document. APC and its subsidiaries have considerable interests in Wyoming, Colorado, and Utah – both as a landowner and as a lessee of federal minerals - in the proposed analysis area that may be affected by the outcome of this planning effort. APC’s interests as a landowner stem from its merger in 2000 with Union Pacific Resources. As a result of that merger, APC owns what is commonly referred to as the “land grant strip,” which is almost 700 miles long and 40 miles wide. The strip passes through southern Wyoming and portions of Northeast Colorado and Utah. Further, APC owns a large number of federal leases and other interests in these states outside of the land grant strip which could potentially be impacted by this Programmatic EIS (PEIS).

After analyzing the limited information provided in the Federal Register notice for this proposal, APC supports the “No Action Alternative”. Rational for this decision is based on the points identified below that the scoping notice does not address:

- The information provided in the Federal Register contains no reference to potential geographic alternative locations of these corridors. Absent proposed locations, it is difficult to draw a conclusion of support or opposition.
- It is unclear whether once these corridors are designated whether there will be any ability to approve future alignments of such corridors. Flexibility needs to be built into any such process for future growth and marketability.
Furthermore, although we recognize that the Energy Policy Act of 2005 requires the designation of the corridors in the identified western states within two years of enactment, we believe all stakeholders would benefit from a minimal delay in the process to provide the opportunity to better define the scope of the project. This will then provide potentially affected stakeholders with the information necessary to provide more meaningful comments regarding the proposal. To achieve this, APC believes the Department of Energy and other affected federal agencies should consider the formation of regional work groups to study the proposal and better define the scope of the program. In the long term, we believe such a delay will actually facilitate completion of the project in the timeframes set by Congress.

APC also believes that the Department of Energy and other federal agencies should consider whether consolidation of ownership of the lands underlying such corridors would be beneficial to the government’s overall ability to manage the corridors.

APC as previously mentioned has significant holdings within these states and placement of a new or expanded corridor could potentially impact existing and/or future mineral lease development. Therefore, APC would like to offer assistance in the continued planning of this project.

If you have any questions or require additional information, please contact me at 832/636-2612 or Patrick_Navrati@anadarko.com.

Respectfully

P[Signature]

Patrick M. Navrati
Senior Staff Regulatory Analyst