



April 20, 2022

Submitted via <https://www.sec.gov/cgi-bin/ruling-comments>

The Honorable Gary Gensler
Chair
U.S. Securities and Exchange Commission
100 F St. NE
Washington, DC 20549

Re: Request for Comment Period Extension on Proposed Rule for The Enhancement and Standardization of Climate-Related Disclosures for Investors; File No. S7-10-22; Release No. 33-11042

Dear Chair Gensler,

The American Exploration and Production Council (AXPC) respectfully requests an extension of 45 days to the comment period for Release No. 33-11042, the proposed rule for The Enhancement and Standardization of Climate-Related Disclosures for Investors. In view of the extent of the proposed rule, the number of specific questions for which the Securities and Exchange Commission (SEC) is soliciting comment, and the effort involved in considering the effects of the proposed rule prior to providing comment, the SEC is justified in granting additional time for public comment.

AXPC recognizes the importance of the Securities and Exchange Commission's (SEC's) mission of protecting investors, maintaining fair, orderly, and efficient markets, facilitating capital formation, and promoting public trust in the market environment. AXPC is a national trade association representing 28 of some of the largest independent oil and natural gas exploration and production companies in the United States. AXPC companies support millions of Americans in high-paying jobs and invest a wealth of resources in our communities. Dedicated to safety, science, and technological advancement, our members strive to deliver affordable, reliable energy to consumers while positively impacting the economy and the communities in which we live and operate.

As part of this mission, AXPC members understand the importance of ensuring positive environmental and public-welfare outcomes and responsible stewardship of the nation's natural resources. The United States is a world leader in oil and natural gas production, achieving that status while at the same time substantially reducing emissions. AXPC members support continued progress on both fronts through innovation and collaboration.

AXPC and its members would like sufficient opportunity to carefully analyze the proposed rule and provide constructive and thorough comments. Sixty days is not sufficient time to study the proposed rule, gather input from the member companies, and reach consensus on a response.

Chair Gensler
April 18, 2022



We appreciate the Security and Exchange Commission's consideration of our request and for the opportunity to provide input on climate-related disclosure. Please do not hesitate to contact us with any questions.

Sincerely,

A handwritten signature in black ink that reads "Wendy Kirchoff". The signature is written in a cursive, flowing style.

Wendy Kirchoff
Vice President, Regulatory Affairs
American Exploration and Production Council
Wendy.Kirchoff@axpc.org