

NIGERIA UNION OF PETROLEUM AND NATURAL GAS WORKERS

AFFILIATED TO THE NIGERIA
LABOUR CONGRESS



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

Dear Secretary Murphy

**PROPOSED RULES REGARDING DISCLOSURE OF PAYMENT BY RESOURCE EXTRACTION
ISSUERS (SECTION 1504 –DODD-FRANK ACT)**

The Nigeria Union of Petroleum and Natural Gas Workers (NUPENG) appreciates the opportunity to provide comments to the Securities and Exchange Commission on the proposed rules regarding the Disclosure of Payments by Resource Extraction Issuers to implement Section 1504 of the Dodd- Frank Act of the United States constitution.

NUPENG represents thousands of workers in all aspects of oil and gas operations, including prospecting, drilling, distribution and marketing. We believe the Dodd-Frank Act is a great opportunity for our members and all Nigerians to obtain information to combat corruption and to demand accountability and transparency for responsible resource use.

We understand that industry commentators have raised concerns about revenue transparency jeopardizing employee's safety. We strongly disagree but instead believe that enhanced transparency will in fact enhance employee safety, especially in volatile places like Nigeria's Niger Delta.

The unpredictable investment environment in Nigeria often leads to militancy and criminal activities in the Niger Delta with our members as major victims of kidnappings and killings. Revenue transparency, including project – level payment disclosure as contained in the communities' memorandum of understanding with companies, will help create incentives for investment that benefits communities alleviating much of the violence in the volatile Niger Delta and improving the safety of our members.

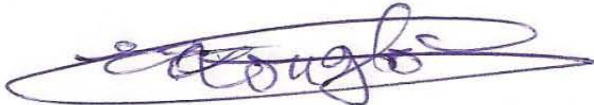
After a cursory look at the submission, NUPENG supports the comments on the proposed rules submitted to you by **Publish What You Pay (PWYP)**. We agree with PWYP that no exemptions should be provided; Issuers should be required to file rather than furnish the required disclosures. The Extractive Industries Transparency Initiative should be the minimum rather

than the maximum requirement that projects should be defined in relation to the lease, license and/or other concession-level arrangements that assign it with rights and fiscal obligations. The SEC should make public a compilation that includes the full level of details that companies are required to report under this statute.

We thank the SEC for the opportunity to provide these comments.

Yours Faithfully

For: ***Nigeria Union of Petroleum and Natural Gas Workers***



Comrade Elijah Okougbo

General Secretary