



September 22, 2023

U.S. Department of the Interior  
Bureau of Land Management  
Tracy Stone-Manning, Director  
1849 C St. NW, Room 5646  
Washington, DC 20240

ATTN: 1004-AE80

Dear Director Stone-Manning,

On behalf of Western Leaders Network, an organization of more than 450 local, tribal, and state elected officials across the Interior West, we write in support of the BLM's proposed rules to modernize the federal oil and gas leasing program, as mandated by the Inflation Reduction Act. Bringing these regulations into the twenty-first century will safeguard our natural resources, protect taxpayer interests, and prioritize the health and welfare of our communities.

Public lands are integral to Western life. They support our livelihoods, boost local economies, preserve biodiversity (and consequently mitigate climate change impacts), and provide an irreplaceable retreat for us to hike, backpack, hunt, fish, and enjoy various outdoor recreational activities. Nearly 192 million acres of BLM federal public lands are open to oil and gas leasing across the West, and there is widespread support among Westerners for holding fossil fuel industries responsible for their pollution, as reflected in the [Colorado College 2023 State of the Rockies Project Conservation in the West poll](#).

The BLM's proposed reforms would require oil and gas companies to pay modernized, reasonable rates in step with reclamation costs, consider natural and cultural resources in leasing decisions, and help capture more revenues for community coffers.

We support several vital aspects of the proposed rules, including:

- Raising the minimum federal bonding rates to more closely reflect the costs of plugging and reclaiming federal well sites and stopping the use of bonds that permit unfettered drilling nationwide under the coverage of a single, inadequate bond. We encourage the BLM to consider full-cost bonding or adjust bonds annually based on inflation. We

support the BLM's proposal to phase in new bond amounts within three years of this rule's implementation.

- Requiring the BLM to consider historical, cultural and environmental factors as part of any National Environmental Policy Act (NEPA) analysis in leasing decisions.
- Increasing royalty, rental rates, and fees to be consistent with those mandated in the Inflation Reduction Act. We recommend increasing surface owner protection bonds to a minimum of \$10,000 per well plus an additional \$2,000 per acre of disturbed land.
- Deprioritizing speculative leasing practices and leasing lands with little or no oil and gas development protection and thus cannot produce any return for taxpayers, which will help ensure more lands can be managed for other uses.

The federal onshore oil and gas leasing program has been on the Government Accountability Office's list of "high-risk" federal programs for over a decade. For years, Western Leaders Network has advocated for the modernization of these policies – some of which have remained stagnant for more than a century – so that companies pay their fair share for the use and exploitation of publicly owned and irreplaceable resources. From [Colorado](#) to [Utah](#) to [New Mexico](#), local elected officials across the West have spoken up on behalf of these common-sense reforms to protect their communities' public health, economic security, safety, and the environment.

Western Leaders Network urges the BLM to swiftly and effectively implement this rule to protect communities from the preventable harms of current and future oil and gas development.

Stewardship of our environment and ensuring a sustainable climate future for the next generation means holding companies that pollute and develop public lands and waters accountable for their impacts. The BLM's proposed updates to federal oil and gas leasing regulations are an exceptional example of the good that can be accomplished through the Inflation Reduction Act and a reasonable expectation for the use of public resources.

Thank you for the opportunity to comment on this rule.

Sincerely,



Gwen Lachelt  
Executive Director