



Jan. 30, 2023

The Honorable Tracy Stone-Manning
Director, Bureau of Land Management
United States Department of the Interior
1849 C Street NW, Room 5665

Washington, DC 20240

cc: The Honorable Debra Haaland, Secretary of the Interior

RE: PROPOSED RULE ON WASTE PREVENTION, PRODUCTION SUBJECT TO ROYALTIES AND RESOURCE CONSERVATION

Dear Director Stone-Manning,

Thank you for the opportunity to comment on the BLM's proposed rule to prevent methane waste in the oil and gas sector. We, the undersigned, are a coalition of 450 tribal, local, and state-elected officials across the Interior West. We represent millions of westerners, many directly affected by oil and gas operations on public and tribal lands.

As elected officials from across the Interior West, we are writing today to thank you for the BLM's hard work drafting a strong methane waste rule and to urge you to make some key improvements to prevent the needless waste of public and tribal resources, protect our communities and constituents from pollution, and build a more resilient climate future.

Two of our primary concerns are that the draft rule does not meet the Biden administration's commitment to phase out routine flaring by 2030 and the Interior Department's obligation to ensure a fair return for the development of our publicly owned resources. We urge the following critical improvements in the final rule:

- The BLM must move beyond its royalty-only approach and require oil and gas companies to capture gas, rather than burn it in flares.
- Flaring should only occur in limited circumstances, such as for safety reasons and maintenance activities. Lack of takeaway capacity is not a justification for routine flaring.

Flaring, or the burning of gas associated with oil wells, is a common practice within the industry that degrades our climate and atmosphere, threatens public health, and needlessly wastes a

resource that could be captured and result in revenue that supports our schools and public services. Communities like ours are directly affected by this lost revenue from methane wasted on public and tribal lands, because 49% of royalties collected from oil and gas operations on federal public lands are returned to states.

The BLM has a statutory mandate to prevent the waste of public and tribal resources. States like Colorado and New Mexico have recently set nation-leading examples of how to cut down on wasted gas, reduce health-hazardous and climate-damaging emissions, protect frontline communities – which are often rural, low-income and/or communities of color – and strengthen accountability for industry operators. Our federal leadership should draw inspiration from these state rulemakings and follow in those administrations’ footsteps by addressing the deficiencies in the current BLM draft rule.

By making sure oil and gas companies capture and sell or use associated gas, the BLM would fulfill its statutory obligations and conserve the public energy resources we can’t afford to waste. What’s more, strengthening the draft proposal is an important component to addressing the climate emergency. [Research shows that the past eight years have been the hottest on record](#), and methane – a greenhouse gas with more than 80 times the warming power of carbon dioxide over the first 20 years after it reaches the atmosphere – is one of the leading contributors to this predicament.

President Biden acknowledged the severity of the climate crisis when he took office and promised to deliver bold, administration-wide action to mitigate its impacts. The BLM methane waste prevention rule is an important opportunity to honor this promise and our communities, which suffer from drought, water shortages, extreme weather and diminishing wildlife habitat due to climate change.

Our constituents deserve a meaningful rule that will protect our energy security, taxpayer and tribal interests, our climate, and the health of our communities.

Please let us know if we can address any questions or provide additional information.

Thank you for your attention to our concerns.

Sincerely,

Arizona

Austin Nunez
Chairman, Tohono O’odham Nation, San
Xavier District

Colorado

Emma Pinter
Adams County Commissioner

Glenn Drummond
Basalt Town Councilor

Deb Gardner
Former Boulder County Commissioner

Elise Jones
Former Boulder County Commissioner

Suzanne Jones
Former Mayor, City of Boulder

Laurie Anderson
Broomfield City Councilor

Allyn Harvey
Former Carbondale Town Trustee

Susan Noble
Commerce City City Councilor

Jolon Clark
Denver City Councilor

Kathy Chandler-Henry
Eagle County Commissioner

Jeanne McQueeney
Eagle County Commissioner

Matt Scherr
Eagle County Commissioner

Dave Munk
Board Chairman, Holy Cross Energy

Gwen Lachelt
Former La Plata County Commissioner

Tim Barnes
Lafayette City Councilor

Tonya Briggs
Lafayette City Councilor

Patrick Berry
Mountain Village Town Councilor

Steve Child
Pitkin County Commissioner

Greg Poschman
Pitkin County Commissioner

Tim Corrigan
Routt County Commissioner

Hilary Cooper
San Miguel County Commissioner

Kris Holstrom
San Miguel County Commissioner

Joan May
Former San Miguel County Commissioner

Julia Marvin
Thornton City Councilor

Kim Langmaid
Mayor, Town of Vail

Montana
Cyndy Andrus
Mayor, City of Bozeman

Shelly Fyant
Former Chairwoman, Confederated Salish
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Juanita Vero
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Howard Watts
State Representative, District 15

New Mexico
Antoinette Sedillo Lopez
State Senator, District 16

Victor Snover
Former Mayor, City of Aztec

Alicia Edwards
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Nathaniel Evans
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Kevin Walker
Grand County Commissioner

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Pete Gosar
Albany County Commissioner

Jill Morrison
Former Soil and Water Conservation
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