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Hello all,

Attached please find the preliminary summary of the recommendations received, broken out by commenter type. Also, see below for a note and some questions from the contractor, which we can discuss during our check-in tomorrow:

Hello,

I hope you all had a good week. Attached please find ICF's interim summary report of public comments. As requested, this report provides a high-level summary of suggestions and recommendations provided by commenters. In today's interim report, we were able to provide summaries for nearly all of the commenter types for which comments were submitted. Commenter types for which summaries are not yet provided include individual/anonymous commenters and Energy Exploration and Production Organizations/Companies. We will cover these in the draft final report.

A couple of other notes:

1. Some commenter types will not appear in the summary report because they did not provide suggestions or recommendations (e.g., Federal Agencies). Please let us know if you would like this called out in the introduction or elsewhere.
2. The report includes footnotes that attribute the summary statements to the commenter names. ICF can easily remove the attributions if you do not want them in the report or public versions.
3. There are two comment bubbles with questions for BOEM to consider.

We welcome your feedback on the format and information captured in this report!

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Appendix C:
Interim Summary of Public Comments
from the
March 25, 2021 Forum

DRAFT: Pre-decisional and deliberative

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Abbreviations and Acronyms

BLM	Bureau of Land Management
EPA	U.S. Environmental Protection Agency
GAO	U.S. Government Accountability Office
GHG	Greenhouse Gas
GOMESA	Gulf of Mexico Energy Security Act
FLPMA	Federal Land Policy and Management Act
LDAR	Leak Detection and Repair Systems
MLA	Mineral Leasing Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
OCS	Outer Continental Shelf
OCSLA	Outer Continental Shelf Lands Act
ONRR	Office of Natural Resources Revenue
PEIS	Programmatic environmental impact statement

Commented [GS1]: When a commenter specifically references BLM or BLM programs by name in their comment, should they be referred to as “the Department” or BLM?

1. Introduction

On March 25, 2021, the Department of the Interior (the Department) hosted a virtual public forum as part of the Department's comprehensive review of the federal oil and gas program as called for in [Executive Order 14008](#). The forum featured several panels to highlight perspectives from invited participants including industry representatives, labor and environmental justice organizations, natural resource advocates, Indigenous organizations, and other experts.

To help inform the Department on next steps and outline recommendations for the Department and United States Congress to improve stewardship of public lands and waters, create jobs, and build a just and equitable energy future, a public comment period was opened from March 25, 2021 through April 15, 2021. Members of the public were asked to submit comments and additional information to inform Interior's interim report at energyreview@ios.doi.gov.

Through April 15, 2021, 119,856 public comments were received, including individual comments, comments submitted as part of mass mail campaigns, petitions, and oral comments submitted during the virtual meeting. Of the comments received, 3,690 were identified as unique, 116,139 were part of 26 different mass mail campaigns and petitions and 27 comments were either duplicate or not germane.

Today's interim report provides a high-level summary of suggestions and recommendations provided by commenters. The summaries are organized by commenter type and then by issue topic.

2. Comments from State Governments

2.1. Jobs/ Unions

- The Department should work on building a path to economic recovery from the COVID-19 pandemic, including identifying ways to create jobs, provide relief for families and businesses, and replenish Gulf of Mexico Energy Security Act (GOMESA) funds.¹

2.2. Energy Needs/ Future Climate Scenarios/ Substitutions

- Foreign countries would supply oil to meet U.S. energy needs if the United States were to reduce its own production. While the transition to renewables is ongoing, the Outer Continental Shelf (OCS) could be a better, and greener, source of traditional energy compared to greater reliance on imported fuels and feedstocks, for which production and transportation could be much less environmentally responsible.²

¹ State of Alabama, Office of the Governor; State of Louisiana, Office of the Governor.

² State of Louisiana, Office of the Governor.

Commented [GS2]: Would BOEM like any graphical representation or other statistics about the comments received in this report? For example, count by commenter type, breakout of the classifications, count of comments who discussed onshore, offshore or both?

- A financially stable, offshore traditional fuels industry would be important in helping States move toward renewables, including offshore wind energy. “The infrastructure and expertise needed to build out an offshore wind energy economy will depend heavily upon leveraging the overlapping resources (ports, roads, highly specialized vessels, skilled mariners and associated supply chains) and skill sets currently supported by the existing offshore oil and gas industry.”³

2.3. Other Impacts

- Prolonged administrative restrictions could severely impact funding sources, which are tied to oil and gas revenues due to the Great American Outdoors Act, for land and water conservation efforts and maintenance of Utah’s National Park System facilities.⁴

2.4. Additional Groups to Outreach/ Coordinate

- The Outer Continental Shelf Lands Act (OCSLA) requires consultation with State governors during the planning process. The Department should consult with State governors to recognize their States’ unique views and needs.⁵
- Local needs and desires should be factored into the Administration’s oil and gas leasing program since local communities will be most directly affected by the associated socioeconomic and environmental impacts.⁶
- The Department is required by the Federal Land Policy and Management Act (FLPMA) to make decisions that are consistent with, to the maximum extent possible, State and County Resource Management Plans. Additional meetings should be held to ensure that States, tribes, local governments, and other stakeholders have meaningful opportunities to engage with the Department. The Department’s outreach and coordination with stakeholders could promote collaboration, innovation, and fairness regarding oil and gas extraction on public lands and make Federal agencies aware of how Federal policy is going to affect local communities.⁷

3. Comments from Local Governments

3.1. Leasing Strategy

- Providing regular lease sales allows developers to efficiently explore and produce resources in a way that limits surface impacts. The opportunity to bid on Federal parcels

³ State of Louisiana, Office of the Governor.

⁴ State of Utah, Department of Agriculture and Food.

⁵ OCS Governors Coalition; State of Alabama, Office of the Governor.

⁶ State of Utah, Department of Agriculture and Food.

⁷ State of Utah, Department of Agriculture and Food.

regularly is important in the context of complex landownership patterns where the checkerboard and split States makes oil and gas leasing challenging.⁸

3.2. Additional Groups to Outreach/ Coordinate

- Counties almost always serve as cooperating agencies on revisions or amendments to the Bureau of Land Management’s (BLM) resource management plans, including planning and project-level analyses involving oil and gas development. An oil and gas moratorium unravels the work counties, and their constituents, dedicate to developing plans for Federal lands over decades in violation of Federal law and policy.⁹

4. Comments from Tribes and Tribal Organizations

4.1. Environmental Justice

- An “equitable share of Federal resources from Executive Order 14008” should be set aside for disadvantaged communities in Alaska.¹⁰

4.2. Tribal Consultation

- Standardize tribal consultation between different States, bureaus, districts, and regional offices involved in oil and gas leasing development.¹¹
- For the Greater Chaco Region, tribal consultation was insufficient.¹²
- Ensure that tribally led cultural resource studies are conducted prior to the Department’s decision about oil and gas leasing development.¹³
- Integrate the review processes required under the National Historic Preservation Act (NHPA) Section 106 and the National Environmental Policy Act (NEPA). Information gathered during the NHPA Section 106 review about cultural resources should be considered during the NEPA review. The Department should consult with tribes throughout both the NHPA and NEPA review processes.¹⁴
- Although a representative from the Alaska Federation of Natives participated in the public forum, the Department should consult representatives from Alaska’s North Slope communities.¹⁵
- Host specific “government-to-government consultation” with tribes regarding oil and gas development on public lands.¹⁶

⁸ Wyoming County Commissioners Association.

⁹ Wyoming County Commissioners Association.

¹⁰ Alaska Federation of Natives; All Pueblo Council of Governors.

¹¹ Pueblo of Acoma.

¹² Pueblo of Acoma; All Pueblo Council of Governors.

¹³ Pueblo of Acoma; Santa Clara Pueblo; All Pueblo Council of Governors.

¹⁴ Pueblo of Acoma; Santa Clara Pueblo; All Pueblo Council of Governors.

¹⁵ Arctic Slope Regional Corporation.

¹⁶ Santa Clara Pueblo.

- The Federal consultation process violates the United Nations Declaration on the Rights of Indigenous Peoples' principle of free, prior, and informed consent.¹⁷
- The Department should recognize tribes' right to regulate energy resources on tribal lands. Self-governance of tribal lands is also helpful in managing sacred cultural sites.¹⁸
- Clarity in communication with the Department, such as where to find the Dear Tribal Leader letters or how to use the Federal Register. Department representatives should visit Alaska to see the entirety of the land.¹⁹
- Expedited timeframes prevent meaningful tribal participation.²⁰

4.3. Jobs/ Unions

- Oil and gas leasing has a positive economic impact, including a ripple-effect to other industries.²¹

4.4. Revenues

- Oil and gas leasing increases State and local government revenues. The revenues allow the local governments to invest in infrastructure, utilities, and other public services.²²

4.5. Leasing Strategy

- Pause lease sales and development until completion of the Greater Chaco Region Resource Management Plan Amendment. Withdraw development from ten miles of critical area surrounding the Chaco Culture National Historical Park.²³
- Withdraw development from tribes' critical areas.²⁴
- Withdraw Secretarial Order 3355, which claimed that Department decision making for oil and gas should proceed on an expedited timeline, and Secretarial Order 3389, which required NHPA Section 106 process to also proceed on an expedited timeline.²⁵
- Remove "imposed and rigid timeframes" so that internal guidance will be more consistent with Executive Order 13990.²⁶

¹⁷ All Pueblo Council of Governors; National Congress of American Indians.

¹⁸ National Congress of American Indians.

¹⁹ National Congress of American Indians.

²⁰ All Pueblo Council of Governors.

²¹ Arctic Slope Regional Corporation.

²² Arctic Slope Regional Corporation.

²³ Pueblo of Acoma; Santa Clara Pueblo; All Pueblo Council of Governors.

²⁴ Santa Clara Pueblo; All Pueblo Council of Governors.

²⁵ Santa Clara Pueblo.

²⁶ All Pueblo Council of Governors.

4.6. Fiscal Terms/ Fair Market Value/ Royalties/ Bonding

- Native Alaskan communities on the North Slope benefit from the royalties of oil and gas development, as provided by the Naval Petroleum Reserves Production Act, which supports public infrastructure and social services.²⁷

5. Comments from Universities

5.1. Technologies or strategies to reduce emissions on facilities or through other means

- Take a multi-step legal approach to restoring regulations on methane emissions and flaring, including:

Flaring:²⁸

- Join the appeal of the “Wyoming case” that vacated the 2016 Waste Prevention Rule (“the 2016 Rule).
- Reverse the Trump Administration’s appeal of the California ruling that vacated the Rescission of the 2016 Rule.
- Once the appeals process for the Wyoming case is completed, initiate a new rulemaking process to strengthen the 2016 Rule.
- Since there are many marginal wells and small operators, at a minimum, routine flaring should be banned for all producers regardless of size. The policy should be phased in over multiple years.
- Equipment standards should be provided for flares, while still allowing innovative technology that improves performance. Recommended standards include:
 - Efficiency standard for flares;
 - Required reporting of the content of emissions from flares;
 - Requirement that flares be lit; and
 - Required detection of unlit flares along with a device that automatically reignites them.

Leak Detection:²⁹

- “Organize a third-party subscription-based regional methane emissions leak detection system on Federal land that includes all the operators and wells within a region to take advantage of the best available technology and take advantage of scale and lower costs. These regional leak detection and repair (LDAR) systems should be managed and staffed by a third party.”

²⁷ Arctic Slope Regional Corporation.

²⁸ Columbia University Center on Global Energy Policy.

²⁹ Columbia University Center on Global Energy Policy.

- “A leak detection system could include satellites, ground sensors, drones, helicopters or airplanes.”
- “Cost-sharing in proportion to production would help defray the cost of modern [LDAR] for small operators and marginal wells.”
- “Those who join the service would have the advantage of third-party certification of their emissions levels. If operators refuse to join, their emissions data would still be captured and published by this system, but they will also need to comply with the 2016 Rule’s LDAR requirements on their own and explain significant differences with the subscription system data.”

Emissions Reporting:³⁰

- Encourage the use of innovative technology to make emissions reporting simpler for the operators and more timely and more transparent for BLM and the public.
 - Encourage the use of innovative technology such as sensors and satellites.
 - The regional LDAR should be the primary way to confirm companies are in compliance with methane emissions rules.
 - Publish the emissions data collected from both company-reported data and from regionally-collected emissions subscription-service data in an easy-to-use format, making the data more transparent to the Department, the companies, and the public. Companies would need to explain substantial differences between reported and third party collected regional emissions data.
 - Companies should be required to report emissions from flaring, venting and methane leaks separately. Today, some State regulations do not distinguish between venting and flaring (e.g., Texas).
 - Establish a portal for all emissions reporting agencies for electronic reporting. A central coordinator should work to reduce overlap and make sure the best technology is used to measure emissions.
- Under the provisions on “Pneumatic Controllers and Pumps” of the 2016 Waste Prevention Rule, assess what can be done about intermediate bleed controllers because they are responsible for 88 percent of the emissions from pneumatic controllers.³¹

5.2. Environmental Justice

- Environmental justice benefits should be included in any cost-benefit analysis. Analyze the impact of the existing emissions or flaring and new rules on low-income groups and native communities.³²

³⁰ Columbia University Center on Global Energy Policy.

³¹ Columbia University Center on Global Energy Policy.

³² Columbia University Center on Global Energy Policy.

5.3. Leasing Strategy

- Increase the rate of tract development by shortening primary terms for onshore oil and gas leases to no more than five years. This will require an act of Congress to amend the Mineral Leasing Act of 1920 (MLA).³³
- Increase the minimum bid per acre to be more aligned with the policies adopted by State agencies. This can be implemented by BLM via the administrative rulemaking process.³⁴
- Terminate the non-competitive leasing program. Eliminating the non-competitive leasing program will require a statutory amendment to the MLA.³⁵
- To better fulfill its statutory multiple-use and sustained yield mission, the Department can adopt leasing policies that are like those of major oil producing States, such as Louisiana, New Mexico, North Dakota, and Texas.³⁶
- Through rulemaking, substantially increase bond amounts to where firms credibly cover the proper wells' plugging and abandonment at the end of their useful life. This approach will also protect taxpayers from paying decommissioning costs and protect public health from the hazards imposed by abandoned wells.³⁷

5.4. Fiscal Terms/ Fair Market Value/ Royalties/ Bonding

- To ensure that BLM meets its statutory responsibilities and better align Federal onshore oil and gas leasing policy with those used by State agencies, the Department could raise the Federal royalty rate to substantially increase taxpayers' returns, reduce the standard lease term to speed the rate at which resources are developed, and increase Federal bonding requirements.³⁸
- To address issues related to mineral leases that transact below market value or do not transact at all, and firms that sit on marginal tracts for a decade and preclude the land use by others and impose administrative costs, BLM should:
 1. Shorten primary terms for onshore oil and gas leases to no more than five years, aligned with the policies adopted by State agencies and leases observed in private markets;
 2. Increase the minimum bid per acre to be more aligned with the policies adopted by State agencies; and
 3. Terminate the non-competitive leasing program.³⁹
- The minimum bid offered should increase from \$2 per acre to \$100 per acre.⁴⁰

³³ Energy Policy Institute at the University of Chicago.

³⁴ Energy Policy Institute at the University of Chicago.

³⁵ Energy Policy Institute at the University of Chicago.

³⁶ Energy Policy Institute at the University of Chicago.

³⁷ Energy Policy Institute at the University of Chicago.

³⁸ Energy Policy Institute at the University of Chicago.

³⁹ Energy Policy Institute at the University of Chicago.

⁴⁰ Natural Resources Law Center at University of Colorado Law School.

Royalties:

- The Department can increase the share of Federal oil and gas resources that leads to revenue for taxpayers rather than profits for oil and gas firms by setting higher royalty rates, eliminating royalty deductions, and increasing the minimum bid in its lease auctions. The negative impacts of a higher royalty rate on development and production can be mitigated by shortening the lease term from ten years to five years and by eliminating the BLM's non-competitive leasing process, though these changes require statutory amendments.⁴¹
- Increase the Federal onshore royalty rate. The statutory minimum royalty rate is 12.5 percent of oil and gas leases. This royalty rate falls below that used in major oil producing States for leases on State-owned land.⁴²
- An increase of royalty rates on new leases should be considered if leasing on Federal lands resumes after the 60-day moratorium. The current 12.5 percent royalty rate has not changed for 100 years and higher rates can be observed on private and many States' lands.⁴³
- A 20 percent royalty rate on Federal lands can be justified. A modest decline in leasing would be made up in terms of revenue.⁴⁴
- "To determine how much the royalty rate can increase without shutting off a large portion of new production, BLM should assess the competitiveness of Federal leases. Any economic impacts could be partially offset by ensuring there were sufficient BLM personnel to avoid major delays in permitting."⁴⁵
- Simplify royalty valuation by eliminating deductions. Office of Natural Resources Revenue (ONRR) could use a liquidly traded, transparent price index, such as West Texas Intermediate or Brent for oil or Henry Hub for natural gas, as the benchmark for all produced oil and gas. With this approach, daily prices can be independently verified by third parties and the markets would be difficult to manipulate.⁴⁶
- ONRR could eliminate deductions for transportation costs, price differentials, or product quality. Potential drilling partners may bid less in certain mineral lease auctions, but the winners of those auctions will end up paying more in royalties."⁴⁷

Bonds:

- Strengthen bonding requirements to protect the environment and public health. BLM can increase its bond requirement by administrative rulemaking, without requiring new statutory authority.⁴⁸

⁴¹ Energy Policy Institute at the University of Chicago.

⁴² Energy Policy Institute at the University of Chicago.

⁴³ Columbia University Center on Global Energy Policy.

⁴⁴ Natural Resources Law Center at University of Colorado Law School.

⁴⁵ Columbia University Center on Global Energy Policy.

⁴⁶ Energy Policy Institute at the University of Chicago.

⁴⁷ Energy Policy Institute at the University of Chicago.

⁴⁸ Energy Policy Institute at the University of Chicago.

- As recommended in a 2019 Government Accountability Office (GAO) report, BLM should increase its bonding amounts.⁴⁹
- The value of bonds on new leases should be increased to adequately cover the cleanup costs of abandoned wells.⁵⁰ The 2019 GAO report indicated that operators' up-front bonds were too small to fully cover clean-up costs, leading taxpayers with the cost to manage orphaned wells.⁵¹

Rental Fees:

- Increase rental fees to \$10 per acre. Although this may result in less leasing, revenues are not expected to decrease. Distinguishing between competitive and noncompetitive leases is not needed if a sufficient fee is charged. Alternatively, an escalating rental fee (e.g., \$10 for the first three years), would discourage companies from holding leases that they are not likely to develop.⁵²

5.5. Energy Needs/ Future Climate Scenarios/ Substitutions

- The Department should think strategically about how to manage the decline of oil and gas industry as actions are taken to thwart climate change will impact oil and gas prices.⁵³

5.6. Orphan Wells/ Remediation

- Offshore wells should also be included in the program. More research is needed on how much methane leakage there may be from idle offshore wells in the Gulf of Mexico.⁵⁴
- Plugging of abandoned oil and gas wells on Federal lands should be funded by Congress, which could be justified as a jobs program in addition to reducing methane leaks.⁵⁵
- The Department should work with Congress, the U.S. Environmental Protection Agency (EPA), other agencies, and industry to adopt an oil and gas leasing program plan like the Abandoned Mine Lands program under the Surface Mining Act, where there is a fee imposed on coal. A one penny tax charged on every barrel of oil produced would generate about \$80 million per year. Similarly, a tax of 5 cents would generate \$400 million per year.⁵⁶

5.7. Regulatory Changes

- Improve legal defensibility of the Waste Prevention Rule. "Depending on the outcome of the appeal of the Wyoming case on the 2016 Rule, BLM may need to develop evidence

⁴⁹ Natural Resources Law Center at University of Colorado Law School.

⁵⁰ Columbia University Center on Global Energy Policy; Energy Policy Institute at the University of Chicago.

⁵¹ Energy Policy Institute at the University of Chicago.

⁵² Natural Resources Law Center at University of Colorado Law School.

⁵³ Natural Resources Law Center at University of Colorado Law School.

⁵⁴ Columbia University Center on Global Energy Policy.

⁵⁵ Columbia University Center on Global Energy Policy.

⁵⁶ Natural Resources Law Center at University of Colorado Law School.

that shows that the rule is a necessary and appropriate means of preventing waste. A clearer reference may be needed in the new rule to provide BLM authority to protect the environment on Federal lands under the FLPMA.”⁵⁷

5.8. Other Impacts

- The Department is encouraged to build a stronger relationship with regional ocean partnerships and similar entities that can help chart and support a plan that is equitable, efficient, and sustainable as it moves down the path to address climate change and the shared management of our environmental and natural resources.⁵⁸
- Invest, at a greater rate, in understanding the complex and integrated nature of coastal communities and natural resources through environmental studies programs.⁵⁹

5.9. Additional Groups to Outreach/ Coordinate

- Engage with regional ocean partnerships at the beginning of development of new rules to keep communications open with a range of stakeholders and improve management.⁶⁰

6. Comments from Non-Energy Industry

6.1. Social Cost of Carbon/Green House Gas (GHG)

- Permanently end new leasing for offshore drilling and invest in clean renewable offshore energy to advance ambitious and durable climate action that protects coastal economies, creates jobs, and benefits everyone.⁶¹
- The Department should develop appropriate methodologies to calculate greenhouse gas (GHG) emissions associated with the entire fuel cycle for Federally leased oil and gas, including extraction, processing, transportation, refining, and combustion.⁶²
- The Department should work to quantitatively monetize the impacts of GHG emissions associated with leased oil and gas using the EPA’s social cost of methane and the Interagency Working Group’s social cost of carbon methodologies, as well as the USGS carbon database.⁶³ Explore alternatives to mitigate those impacts and ensure that leased oil and gas does not stand as an obstacle to GHG emission reduction goals. In coordination with other appropriate agencies, the Department should determine how much of U.S. GHG emissions should be permitted to come from Federal oil and gas leasing.

⁵⁷ Columbia University Center on Global Energy Policy.

⁵⁸ Harte Research Institute for Gulf of Mexico Studies at Texas A&M University.

⁵⁹ Harte Research Institute for Gulf of Mexico Studies at Texas A&M University.

⁶⁰ Natural Resources Law Center at University of Colorado Law School.

⁶¹ Business Alliance for Protecting the Pacific Coast.

⁶² Powder River Basin Resource Council.

⁶³ Powder River Basin Resource Council.

- Once a “Carbon Budget” is developed, the Department should take account of existing leases and then allocate any remaining budget to new leasing based on a revised leasing framework.⁶⁴
- The Department should also consider incorporating the life-cycle costs of GHG emissions into the royalty rates charged for access to Federally leased oil and gas. The Department should also consider the relevant alternatives associated with where the money raised by such fees should be allocated, including payment for carbon mitigation or other efforts to reduce GHG emissions elsewhere; assisting oil and gas employees displaced by reductions in Federal oil and gas leasing or assisting States with lost revenue; or supporting oil and gas reclamation projects in areas where operators have not fulfilled their reclamation obligations.⁶⁵

6.2. Other Environmental Considerations

- It is imperative that, as soon as practicable, the Department completes the Programmatic Environmental Impact Statement (PEIS) and moves forward with revising its regulations necessary to carry out the decisions made by the NEPA process. Any proposed regulatory or other reforms should require notice and comment be issued concurrently with the Final PEIS.⁶⁶

6.3. Revenue

- Consider developing new operating standards that promote real-time, continuous independent monitoring. Economic benefits of new standards including:
 1. Ensuring that natural gas remains in the pipe, allowing more revenues will flow to Federal, State, and local entities;
 2. Allowing the Federal government to lead production of the cleanest energy products available in the U.S. and set the stage for a market in differentiated natural gas products; and
 3. The cleaner products command a higher price in the marketplace, leading to higher royalty payments.⁶⁷

6.4. Leasing Strategy

- Update policies like those below as they indirectly subsidize oil and gas development at the expense of the American taxpayer:⁶⁸
 - Lease suspensions: inappropriate use of lease suspensions and unitization allows industry to hold leases indefinitely without production.

⁶⁴ Powder River Basin Resource Council.

⁶⁵ Powder River Basin Resource Council.

⁶⁶ Powder River Basin Resource Council.

⁶⁷ Project Canary.

⁶⁸ Powder River Basin Resource Council.

- Lease reinstatements: current agency guidance does not provide clear direction for staff to evaluate and approve or deny reinstatements to ensure consistency with the MLA and agency regulations.
- Leasing low potential lands: outdated planning guidance leads BLM to make most Federal minerals available to leasing in land use plans, regardless of the likelihood of development and in conflict with multiple use management and fiscal responsibility.
- Leasing all oil and gas resources under a surface parcel: unlike private landowners, Department leases all oil and gas resources under a surface parcel, rather than leasing a specific formation slated for development.

6.5. Fiscal Terms/ Fair Market Value/ Royalties/ Bonding

- Require reclamation bonds that adequately cover plugging and reclamation costs of wells. Like wells bonded under the underground injection control program of the Safe Drinking Water Act, bonds should be site-specific, full-cost bonds, or \$13 per foot.⁶⁹
- Update definitions and mechanisms to properly track and review bond adequacy and well status. BLM should seek consistency with States like Wyoming to better track idle and orphan wells.⁷⁰
- The Department has a duty to update its revenue-generating policies, including more accurately compensate the American taxpayer for the value and cost of the oil and gas resources being leased.⁷¹
- The Department should increase Federal onshore royalty rates because they are lower than the rates used by every major western oil and gas producing State and commonly charged by private mineral owners. The Department should consider other mechanisms to enhance financial return, including net profit sharing or royalty bidding.⁷²

6.6. Permitting/ Exploration, Development, and Drilling Plans

- New operating standards for natural gas development on public lands should contain the following concepts:
 - Real-time, Continuous Monitoring of Emissions:
 - Hold operators to account for any leaks by requiring real-time, continuous monitoring of emissions at the wellhead/production pad.
 - Utilize existing technology to monitor the carbon and methane intensity of production.
 - Require real-time access to, and sharing of, data with Federal and State agencies by independent third parties to ensure the veracity of data.
 - Operational Elements:

⁶⁹ Powder River Basin Resource Council.

⁷⁰ Powder River Basin Resource Council.

⁷¹ Powder River Basin Resource Council.

⁷² Powder River Basin Resource Council.

- Engineering controls – require the highest level of standards for well development, including casing and cement, monitoring, and maintenance.
 - Well control excellence (drilling and completions) – require well operators to display well control competency and emergency response capability, ensuring that a well control incident during both drilling and completions operations can be addressed in a timely fashion.
 - Operational impacts – ensure that development plans mitigate environmental and community disturbance through proper engineering controls and communication channels, including biodiversity considerations, channels for public input, and noise/dust/light mitigation.
 - Emergency response – ensure that an operator must show demonstrable engagement in emergency response by providing training program requirements and emergency response plan, or equivalent, that outlines various stakeholders and their respective responsibilities.
 - Spill mitigation and response – utilize the highest industry standards in spill mitigation and response through appropriate risk mitigation and availability of relevant spill response equipment by operators.
 - Water stewardship – focus on responsible water stewardship using recycled water and the completion of periodic water impact analysis.
 - Reclamation and abandonment – demonstrate the capability to, or have a plan, to successfully reclaim affected surface areas and commit to plug and abandonment operations.⁷³
- Require phased development of oil and gas resources and prioritize phased development as an option to better address the on-the-ground impacts of Federal oil and gas development.⁷⁴

6.7. Regulatory Changes

- Restore the multiple use mission of the BLM and ensure that air, water, land, and wildlife resources are prioritized and protected. This is needed on both Federal surface land, managed by the BLM or other Federal land managing agencies, and on split State lands where Federal oil and gas resources are developed.⁷⁵
- Revise and update that Federal oil and gas leasing and development framework in a manner that will minimize the extent to which Federal oil and gas contributes to the emissions that drive climate change; ameliorate direct impacts to the environment where Federal oil and gas is developed; and maximize the value of this Federal resource.⁷⁶
- Explore alternatives that will achieve the following overarching objectives:⁷⁷

⁷³ Project Canary.

⁷⁴ Powder River Basin Resource Council.

⁷⁵ Powder River Basin Resource Council.

⁷⁶ Powder River Basin Resource Council.

⁷⁷ Powder River Basin Resource Council.

- Delineating the full scope of GHG emissions associated with Federal oil and gas leasing and development, including upstream, midstream, and downstream emissions; and then reducing, mitigating, or eliminating these emissions to align with the Nation’s priorities and actions to address climate change;
 - Identifying and fully presenting a detailed analysis of the direct adverse environmental impacts associated with Federal oil and gas leasing and development and developing new regulations and policies to ensure these impacts are minimized, including insuring proper reclamation; and
 - Reforming the oil and gas leasing price structure to advance GHG emission reduction objectives, ensure meaningful competition, and provide a transparent and fair return to taxpayers.
- During its review, the Department should provide a complete environmental analysis of, potential alternatives to, and mitigation measures associated with, Federal oil and gas leasing and developments. The Department should have an informed basis for restructuring the regulatory and policy framework for Federal oil and gas leasing and development. Objectives should include minimizing contributions to GHG emissions and other environmental harms, while maximizing returns to the American public.⁷⁸

6.8. Other Impacts

- Adopt broad, uniform, performance-based standards that ensure all Federal wells drilled meet acceptable minimum requirements for reclamation. Consider establishing, “unsuitability-for-leasing criteria focused on insuring that remediation can be adequately completed, and additional design criteria to ensure that lease tract and APD design best align with remediation objectives.”⁷⁹
- Consider new ways to better enforce and require compliance with existing and new regulatory standards.⁸⁰
- Adopt a “bad operator” standard that would preclude any new leases or permits to any company that is out-of-compliance with FLPMA, MLA, Clean Water Act, Clean Air Act, or any other environmental requirements at any well they operate.⁸¹
- Prioritize public health and safety protection through coordination with the EPA to update air quality standards, improve air quality modeling and monitoring, and minimize venting and flaring at Federal oil and gas wells.⁸²
- Consistently enforce compliance with the quarter-mile setback from homes contained within Lease Notice #1, including clarifying that this Federal setback overrules any smaller State setback requirements.⁸³

⁷⁸ Powder River Basin Resource Council.

⁷⁹ Powder River Basin Resource Council.

⁸⁰ Powder River Basin Resource Council.

⁸¹ Powder River Basin Resource Council.

⁸² Powder River Basin Resource Council.

⁸³ Powder River Basin Resource Council.

6.9. Additional Groups to Outreach/ Coordinate

- Engage with coastal businesses during the comprehensive review. Coastal businesses are linked to ocean and beach health and understand that a robust and productive coastal economy is dependent on a healthy environment.⁸⁴
- Engage and consult landowners in all stages of development through lease notices, consent of leasing, onsite inspections, and analyses to determine well and infrastructure placement and reclamation.⁸⁵

7. Comments from Public Interest and Non-Governmental Organizations

7.1. Environmental Justice

- Consider environmental justice and equity when reviewing the program.⁸⁶

7.2. Other Environmental Considerations

- Increase transparency in the environmental review process.⁸⁷

7.3. Leasing Strategy

- Mandate for the oil and gas leasing program that “leasing is not mandatory and should only be allowed if and when consistent with the multiple-use principle.”⁸⁸

7.4. Fiscal Terms/ Fair Market Value/ Royalties/ Bonding

- Adjust royalty rates to account for environmental harms caused by oil and gas development.⁸⁹
- End the practice of royalty relief.⁹⁰

⁸⁴ Business Alliance for Protecting the Pacific Coast.

⁸⁵ Powder River Basin Resource Council.

⁸⁶ Western Leaders Network.

⁸⁷ U.S. PIRG and Environment America.

⁸⁸ Western Leaders Network.

⁸⁹ U.S. PIRG and Environment America; Nevada Conservation League; Western Leaders Network.

⁹⁰ U.S. PIRG and Environment America.

7.5. Decommissioning

- Close loopholes that “place the burden of reclamation costs on taxpayers and private landowners.”⁹¹

7.6. Energy Needs/ Future Climate Scenarios/ Substitutions

- The Department should support the transition to renewable energy, specifically offshore wind. Nineteen of the 29 States with offshore wind potential could produce more electricity from the offshore wind than total electricity used by those States in 2019.⁹²

7.7. Legislative Recommendations

- Congress should adopt legislation that would protect Nevada’s Ruby Mountains and other public lands, such as Senator Cortez Masto’s “End Speculative Oil and Gas Leasing Act,” which would end certain leasing practices and establish protections for public lands.⁹³

8. Other Commenters

8.1. Other Impacts

- Promulgate rules to protect air quality and prepare a PEIS pursuant to NEPA with a “strategic targeted focus on data collection, assessment, and review specific to the cumulative impacts in the Central Gulf of Mexico OCS region.”⁹⁴

⁹¹ Western Leaders Network.

⁹² U.S. PIRG and Environment America.

⁹³ Nevada Conservation League.

⁹⁴ Operation Homecare.

From: [Lefton, Amanda B](#)
To: [Knodel, Marissa S](#); [Daniel-Davis, Laura E](#); [Feldgus, Steven H](#); [Scott, Janea A](#); [Sanchez, Alexandra L](#); [Diera, Alexx A](#); [Culver, Nada L](#); [Jackson, Danna R](#)
Subject: RE: Preliminary summary of public feedback for review
Date: Tuesday, May 18, 2021 5:55:07 PM

Thank you, Marissa!

From: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Sent: Tuesday, May 18, 2021 5:50 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Scott, Janea A <janea_scott@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <adiera@blm.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>; Lefton, Amanda B <Amanda.Lefton@boem.gov>
Subject: Preliminary summary of public feedback for review

Hello all,

Attached please find the preliminary summary of the recommendations received, broken out by commenter type. Also, see below for a note and some questions from the contractor, which we can discuss during our check-in tomorrow:

Hello,

I hope you all had a good week. Attached please find ICF's interim summary report of public comments. As requested, this report provides a high-level summary of suggestions and recommendations provided by commenters. In today's interim report, we were able to provide summaries for nearly all of the commenter types for which comments were submitted. Commenter types for which summaries are not yet provided include individual/anonymous commenters and Energy Exploration and Production Organizations/Companies. We will cover these in the draft final report.

A couple of other notes:

1. Some commenter types will not appear in the summary report because they did not provide suggestions or recommendations (e.g., Federal Agencies). Please let us know if you would like this called out in the introduction or elsewhere.
2. The report includes footnotes that attribute the summary statements to the commenter names. ICF can easily remove the attributions if you do not want them in the report or public versions.
3. There are two comment bubbles with questions for BOEM to consider.

We welcome your feedback on the format and information captured in this report!

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: [SharePoint Online](#)
To: [Sanchez, Alexandra L](#)
Subject: Alonso, Shantha R successfully used the link to "Outreach Summary_interim report"
Date: Wednesday, July 7, 2021 1:38:07 PM
Attachments: [4dfd98cc-4dda-4940-a094-606d0a9e059b](#)
[38c8f3c5-7a82-4487-bf40-f4465c689d31](#)
[1ffbc118-1a95-4267-b63f-b82683b25cdf](#)

Alonso, Shantha R < shantha_alonso@ios.doi.gov > has opened the link you sent to "Outreach Summary_interim report"!

If this is unexpected, you can open your document and manage its sharing permissions by clicking [here](#).



This link only works for the direct recipients of this message.



Outreach Summary_interim report

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Microsoft Corporation, One Microsoft Way, Redmond, WA 98052

[Notification Settings](#)

From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: Interim report revision re: public feedback
Date: Tuesday, June 29, 2021 6:05:10 PM

Great, thanks, glad I included him then!

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, June 29, 2021 6:04 PM
To: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: RE: Interim report revision re: public feedback

Just the outreach doc. Steve is on the report edits!

From: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Sent: Tuesday, June 29, 2021 4:02 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Interim report revision re: public feedback

Sorry, one more clarification -- did you mean you were editing and reformatting the interim report and can make the changes to the public feedback summary section, or just the outreach document?

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, June 29, 2021 6:00 PM
To: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: RE: Interim report revision re: public feedback

Oh yes, indeed. Thank you!

From: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Sent: Tuesday, June 29, 2021 4:00 PM

To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Subject: Re: Interim report revision re: public feedback

Was that VA OSW wind event meant for a different e-mail chain?

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Sent: Tuesday, June 29, 2021 5:59 PM

To: Knodel, Marissa S <Marissa.Knodel@boem.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Lefton, Amanda B <Amanda.Lefton@boem.gov>

Subject: RE: Interim report revision re: public feedback

Here you go!

Alex

From: Knodel, Marissa S <Marissa.Knodel@boem.gov>

Sent: Tuesday, June 29, 2021 3:53 PM

To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Lefton, Amanda B <Amanda.Lefton@boem.gov>

Subject: Interim report revision re: public feedback

Hello everyone,

As I was updating the outreach document Alex circulated, I realized that we need to update the public feedback summary in the interim report to reflect the final numbers from the consultant as follows:

Between March 25 and April 15, the Department of the Interior received 155,021 submissions of public feedback. Of that total, 3,688 were identified as unique submissions and 151,333 were form letters and petitions from 28 campaigns. Feedback was submitted by:

- State Governors and State agencies (5)
- Local government (Mayors, City Council members, County Commissioners) (3)
- Non-energy industry and associations (9)
- Energy exploration and production companies and associations (39)
- Tribes and Tribal Organizations (16)
- Federal agencies (2)
- Public interest groups and NGOs (199)

- Unions (5)
- Universities, Research Institutes (11)
- Public, non-affiliated (154,728)

All other summary text remains accurate.

Peace,

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: [Simon, Benjamin M](#)
To: [Culver, Nada L](#)
Cc: [Steele, Jonathan](#); [Lee, Patrick](#); [Crowley, Christian](#); [Miller, Ann W](#); [Sanchez, Alexandra L](#)
Subject: RE: bonus bid estimates
Date: Tuesday, June 8, 2021 11:35:53 AM
Attachments: [Bonus bid revenue estimates - draft 6 8 21.docx](#)

Hi Nada,

Here is an electronic version of the paper we prepared. Please feel free to send along any questions.

Ben

From: Simon, Benjamin M
Sent: Monday, June 7, 2021 6:19 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Steele, Jonathan <Jonathan_Steele@ios.doi.gov>; Lee, Patrick <patrick_lee1@ios.doi.gov>; Crowley, Christian <Christian_Crowley@ios.doi.gov>; Miller, Ann W <ann_miller@ios.doi.gov>
Subject: bonus bid estimates

Hi Alex,

Here is a draft version of the executive summary. It contains the results tables. We still have some formatting things to clean up in the paper, but we should be able to get it to you in the morning. Please let us know if you have any questions.

Ben

Benjamin Simon, Ph.D., Chief DOI Economist
Office of Policy Analysis
U.S. Department of the Interior
1849 C St. NW
Washington DC
202 208 4916 (land line); 202 281 0503 (cell)
benjamin_simon@ios.doi.gov

Memorandum

To: Nada Culver

From: Benjamin Simon, Chief DOI Economist

Subject: Bonus Bid Revenue Estimates

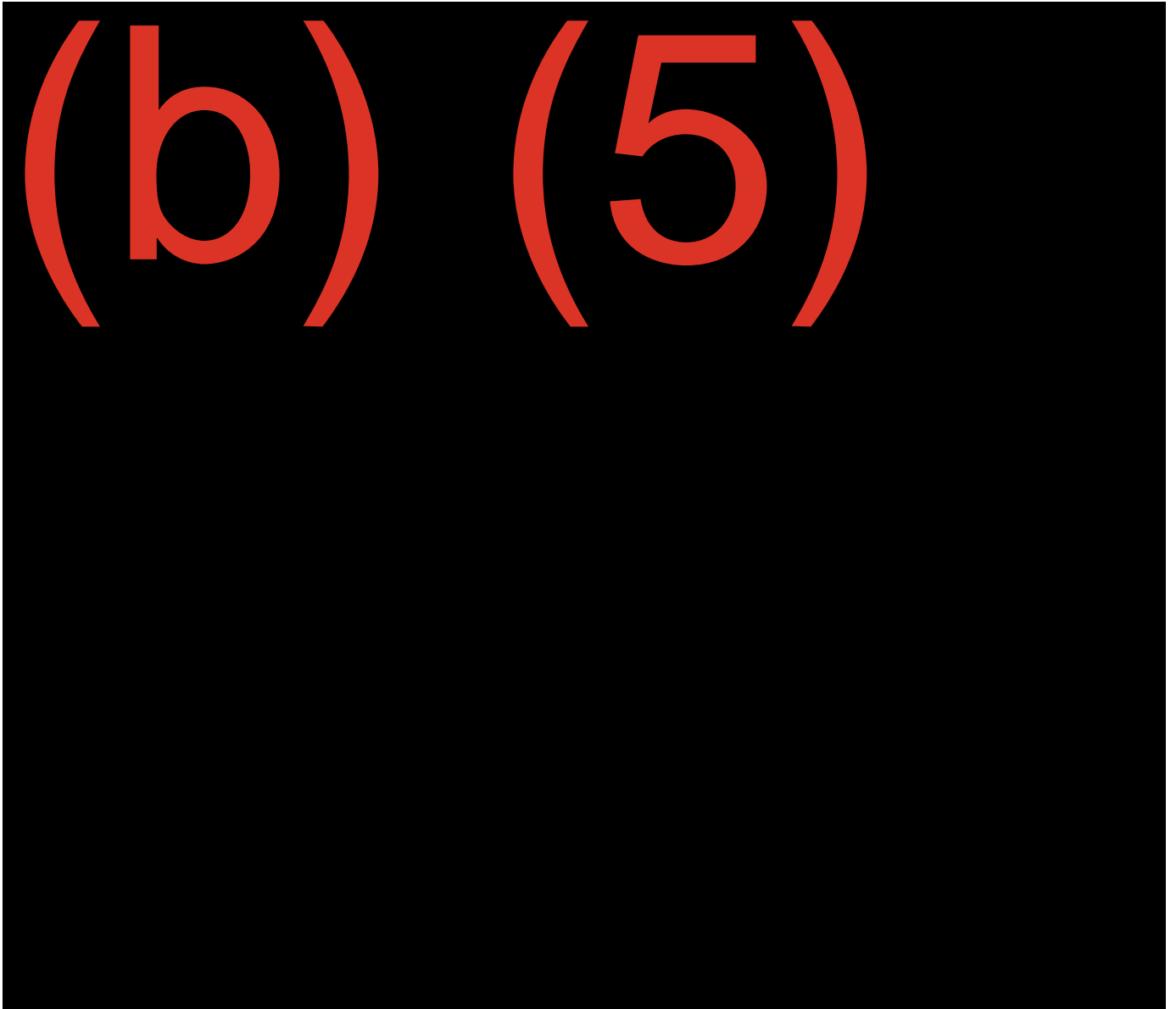
Date: June 7, 2021

Attached are preliminary estimates of bonus bid revenues prepared by economists in the DOI Office of Policy Analysis. The estimates are subject to caveats that are identified in the paper. Additional analysis would be required to improve the bonus bid estimates as well as to develop estimates of royalty revenues.

Bonus Bid Revenue Estimates

Office of Policy Analysis
June 8, 2021

Contents

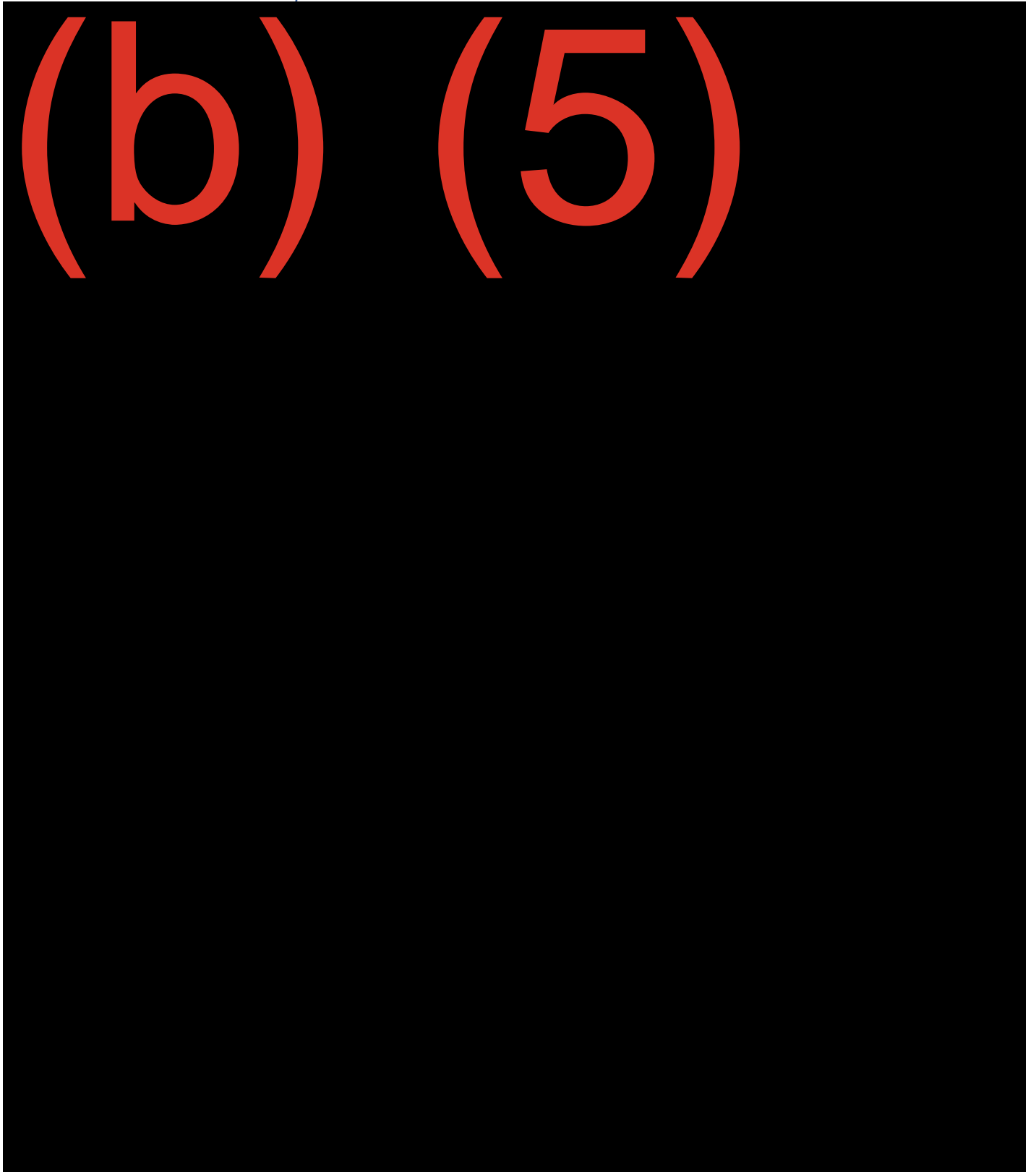


Executive Summary

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Introduction and Objectives

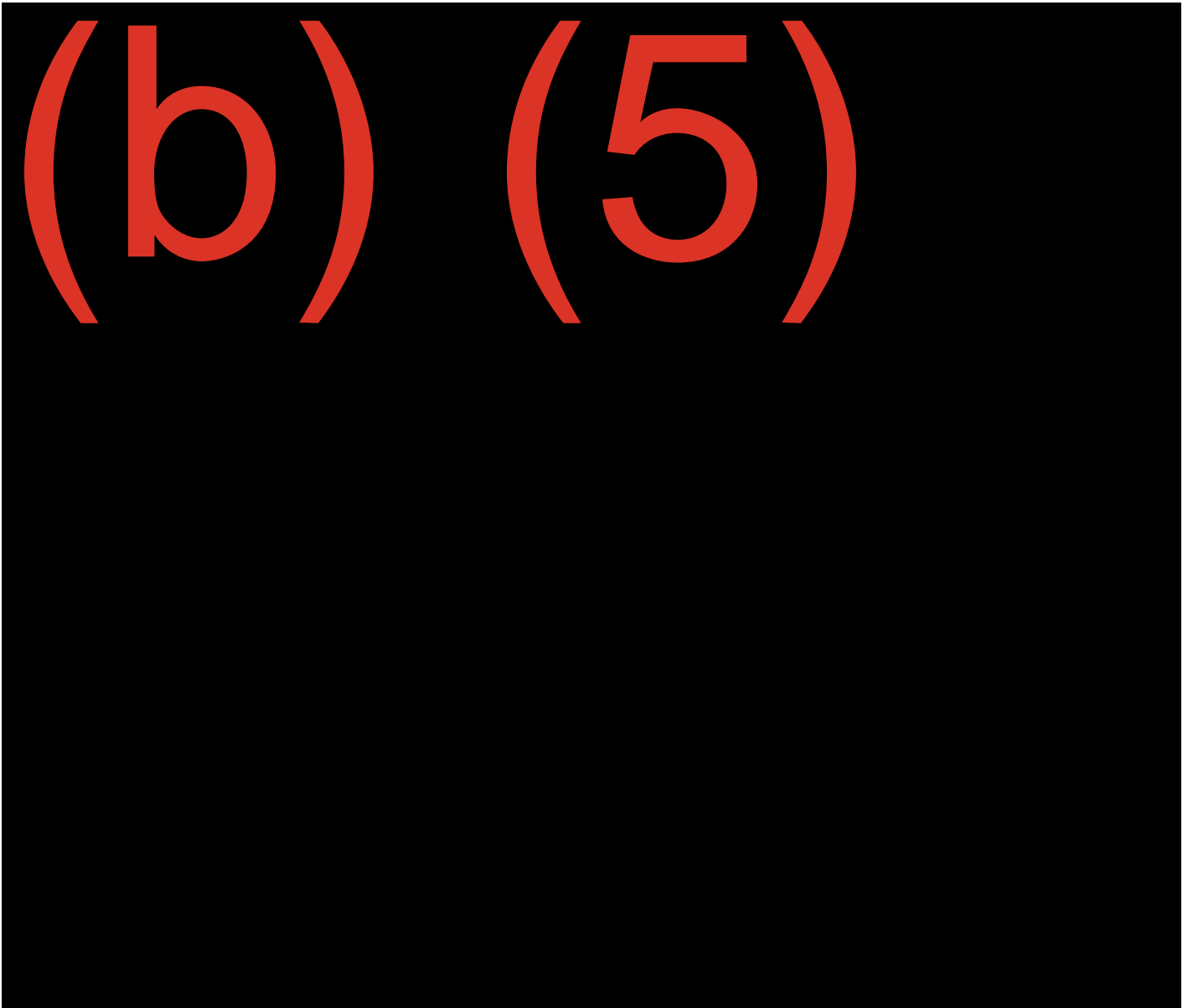


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From: [Feldgus, Steven H](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: Leasing stat
Date: Monday, June 7, 2021 6:35:26 PM

(b) (5)

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Monday, June 7, 2021 6:18 PM
To: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: FW: Leasing stat

(b) (5)

From: Culver, Nada L <nculver@blm.gov>
Sent: Monday, June 7, 2021 11:52 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Moran, Jill C <jcmoran@blm.gov>
Cc: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: RE: Leasing stat

Oh sorry – just realized there was a typo in my email – it’s around 1.2 million acres (not 1.5) of the 6.1 million acres sold.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Culver, Nada L
Sent: Monday, June 7, 2021 10:04 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Moran, Jill C <jcmoran@blm.gov>
Cc: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: RE: Leasing stat

We make the point that noncompetitive leases don’t get a bid and that leases with higher bids actually get developed.

Here’s the stat handily compiled by center for western priorities -
<https://westernpriorities.org/dashboard-oil-gas-leasing/> - about 1.5 million acres

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management

Cell: 202-255-6979

nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Monday, June 7, 2021 9:58 AM
To: Culver, Nada L <nculver@blm.gov>; Moran, Jill C <jcmoran@blm.gov>
Cc: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: RE: Leasing stat

That would be helpful, I think! (b) (5)

, btw?

From: Culver, Nada L <nculver@blm.gov>
Sent: Monday, June 7, 2021 8:30 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Moran, Jill C <jcmoran@blm.gov>
Subject: RE: Leasing stat

Because the lands under lease right now go back decades (including midway through the last century) we cannot come up with that stat.

We have that stat for the last 4-5 years.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Monday, June 7, 2021 8:25 AM
To: Culver, Nada L <nculver@blm.gov>; Moran, Jill C <jcmoran@blm.gov>
Subject: Leasing stat

Nada and Jill,
Good morning!
Do we have this stat handy? "X percent of lands under lease right now were sold for \$2 per acre or less."
Let me know what you think!
Alex

Alexandra Sanchez (she/her)
Special Assistant
Office of the Assistant Secretary
Land and Minerals Management

U.S. Department of the Interior

From: [Daniel-Davis, Laura E](#)
To: [Feldgus, Steven H](#); [Sanchez, Alexandra L](#)
Subject: Re: O&G report
Date: Monday, June 7, 2021 1:16:03 PM

Thanks - I will take a look at try to keep it moving.

Laura

From: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Sent: Monday, June 7, 2021 1:14 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: O&G report

Just finished making my edits on top of Larry's – the only thing I didn't try to address at all was his comment under "the need for reform" (around page 7) (b) (5)

so wasn't sure the best specifics to pick.

Steve Feldgus, Ph.D.
Deputy Assistant Secretary for Land and Minerals Management
U.S. Department of the Interior
Steve_feldgus@ios.doi.gov
He/his

From: [Klaja, John M](#)
To: [Sanchez, Alexandra L](#)
Cc: [Ravas, Theodore J](#)
Subject: Re: Infographics
Date: Monday, June 7, 2021 8:53:42 AM
Attachments: [image001.png](#)

Awesome!

Thanks Alexandra.

Let's make it a great week.

John

John Klaja

Visual Information Specialist
U.S. Department of the Interior
Office of Facilities and Administrative Services (OFAS)
Creative Communication Services
1849 C Street, NW MS 1647
Washington, DC 20240
Office: 202-208-6246
Mobile: 202-603-2694
John_Klaja@ios.doi.gov

For more information visit our website at: <http://www.doi.gov/ofas>
Graphics mailbox ofas_creative_services@ios.doi.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Date: Friday, June 4, 2021 at 5:45 PM
To: Klaja, John M <john_klaja@ios.doi.gov>
Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>
Subject: Re: Infographics

I believe I will have a draft to you Monday!
Thank you!
Alex

From: Klaja, John M <john_klaja@ios.doi.gov>
Sent: Friday, June 4, 2021 2:41:04 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>
Subject: Re: Infographics

Hi Alexandra,

Happy Friday! Just checking in on the status of receiving a draft copy of the Oil and Gas Report. We have four solid days of training the week after next...so if you have something we can begin working on a rough layout next Monday, June 7th that would be ideal.

Please let us know ASAP so that we can support your team with this report.

Thank you,

John

John Klaja

Visual Information Specialist
U.S. Department of the Interior
Office of Facilities and Administrative Services (OFAS)
Creative Communication Services
1849 C Street, NW MS 1647
Washington, DC 20240
Office: 202-208-6246
Mobile: 202-603-2694
John_Klaja@ios.doi.gov

For more information visit our website at: <http://www.doi.gov/ofas>
Graphics mailbox ofas_creative_services@ios.doi.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Date: Friday, May 28, 2021 at 1:03 PM

To: Klaja, John M <john_klaja@ios.doi.gov>

Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>

Subject: RE: Infographics

Of course!

Hope you enjoy your weekends also!

From: Klaja, John M <john_klaja@ios.doi.gov>

Sent: Friday, May 28, 2021 10:51 AM

To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>

Subject: Re: Infographics

Thanks Alexandra for the update. Much appreciated.

Enjoy the holiday weekend,

John

John Klaja

Visual Information Specialist
U.S. Department of the Interior
Office of Facilities and Administrative Services (OFAS)
Creative Communication Services
1849 C Street NW RM 1647
Washington, DC 20240
Mobile: 202-421-4195
John_Klaja@ios.doi.gov

For more information visit our website at: <http://www.doi.gov/ofas>
Graphics mailbox ofas_creative_services@ios.doi.gov

From: "Sanchez, Alexandra L" <alexandra_sanchez@ios.doi.gov>
Date: Friday, May 28, 2021 at 12:49 PM
To: "Klaja, John M" <john_klaja@ios.doi.gov>
Cc: "Ravas, Theodore J" <theodore_ravas@ios.doi.gov>
Subject: RE: Infographics

Just wanted to update, we are still in a holding pattern.

I hope to have more clarity by the end of next week, and want to thank you for being so patient on this.

Sincerely,
Alex

From: Klaja, John M <john_klaja@ios.doi.gov>
Sent: Monday, May 24, 2021 12:31 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>
Subject: RE: Infographics

Okay. Sounds great Alexandra.

Thank you,

John

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Monday, May 24, 2021 2:29 PM
To: Klaja, John M <john_klaja@ios.doi.gov>
Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>
Subject: RE: Infographics

Let me ask again about the draft! Tomorrow would be better to meet, I have back to back meetings

today.

From: Klaja, John M <john_klaja@ios.doi.gov>
Sent: Monday, May 24, 2021 10:36 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>
Subject: Re: Infographics

Hi Alexandra,

Thanks for the Infographics and text box callouts. Glad to hop on a call at your convenience to discuss.

Also, even if you have a *VERY* rough draft that would be helpful, so I can lay out a few sample text spreads for review/approval.

Thank you,

John

John Klaja

Visual Information Specialist
U.S. Department of the Interior
Office of Facilities and Administrative Services (OFAS)
Creative Communication Services
1849 C Street NW RM 1647
Washington, DC 20240
Mobile: 202-421-4195
John_Klaja@ios.doi.gov

For more information visit our website at: <http://www.doi.gov/ofas>
Graphics mailbox ofas_creative_services@ios.doi.gov

From: "Sanchez, Alexandra L" <alexandra_sanchez@ios.doi.gov>
Date: Monday, May 24, 2021 at 11:39 AM
To: "Klaja, John M" <john_klaja@ios.doi.gov>, "Ravas, Theodore J" <theodore_ravas@ios.doi.gov>
Subject: Infographics

Sanchez, Alexandra L has shared a OneDrive for Business file with you. To view it, click the link below.

 [Infographics.docx](#)

Let me know if you want to have a call to discuss.

Also, the draft is about a week delayed, I am sorry if this is causing scheduling or any other issues for you.

Thanks!

Alex

Alexandra Sanchez (she/her)
Special Assistant
Office of the Assistant Secretary
Land and Minerals Management
U.S. Department of the Interior

From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: report updates
Date: Friday, June 4, 2021 10:18:14 PM

You are the best! Thank you!

Get [Outlook for iOS](#)

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, June 4, 2021 7:42:40 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: Re: report updates

Btw, I fixed all the cites and the table of contents Will work on the other outstanding qs too.

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, June 4, 2021 4:54:06 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: Re: report updates

Thank you!! Looking great!
I let graphics know we'd probably have something for them on Monday.
Hope you can have a relaxing weekend too!
Alex

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, June 4, 2021 4:03:09 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: report updates

I moved (b) (5) into the body of the report and deleted appendix C.

I cut (b) (5) section in offshore. (b) (5)

Narrative down to 19 pages and I think it is a quick and good read!

Hope you can relax this weekend!

Laura

From: [Daniel-Davis, Laura E](#)
To: [Roberts, Lawrence S](#); [Anderson, Robert T](#); [Wallace, Andrew G](#)
Cc: [Kelly, Katherine P](#); [Sanchez, Alexandra L](#); [Feldgus, Steven H](#)
Subject: oil and gas interim review
Date: Friday, June 4, 2021 5:56:27 PM

Hi all-

I just sent you a link to the latest draft of the interim report on DOI's oil and gas program. This has been toiled over and most recently excellently slimmed down and edited by Kate Kelly and Alex Sanchez. This version - with your helpful feedback - is what we'd like to send forward early next week for further review.

(b) (5)

A large section of the email is redacted with black bars. The redaction covers approximately four lines of text. The first line of the redacted area is labeled with "(b) (5)" in red text.

Bob, Natalie and Travis of your team reviewed previous versions - since then we've mostly cut back!

And finally - you will see we still have a few open Qs, need for cites, etc. Don't let that slow your reading down and feel free to provide the answer if you have it.

Bon weekend-
Laura

From: [Kelly, Katherine P](#)
To: [Daniel-Davis, Laura E](#); [Sanchez, Alexandra L](#)
Subject: draft report
Date: Thursday, June 3, 2021 11:38:01 PM

Sorry that it took me so long to turn around edits! And Alex – thanks for the great (b) (5) info. Dropped that into appendix c.

A few notes:

- I did a big cut and paste job! The main edits were re-organizing the report in an attempt to remove some of the repetition regarding background on the onshore/offshore programs. Because so many things were moved around, the tracked changes became impossible to manage. I am hopeful that folks still see the main points/language they want in there... but perhaps condensed and moved around.
- deleted a few reforms (for discussion)
- created a new section - the need for reform – that pulled in info from a few places,
- added some framing for the recommendations
- swapped out the current conclusion for an endnotes.

Let me know if you want to touch base to talk through any of it. Thanks for the chance.

From: [Kelly, Katherine P](#)
To: [Daniel-Davis, Laura E](#); [Sanchez, Alexandra L](#)
Subject: Kelly, Katherine P shared "DRAFT Report 052121kk" with you.
Date: Thursday, June 3, 2021 11:29:22 PM
Attachments: [AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)



Kelly, Katherine P shared a file with you

Here's the document that Kelly, Katherine P shared with you.



DRAFT Report 052121kk



This link only works for the direct recipients of this message.

Open

From: [Feldgus, Steven H](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: Sanchez, Alexandra L shared "DRAFT (b) (5)" on Federal O&G Leasing" with you.
Date: Thursday, June 3, 2021 9:10:25 PM
Attachments: [DRAFT \(b\) \(5\) on Federal O&G Leasing sf.docx](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Was a few paragraphs in before realized I had track changes off – sorry!

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, June 3, 2021 5:39 PM
To: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: RE: Sanchez, Alexandra L shared "DRAFT (b) (5)" on Federal O&G Leasing" with you.

Thank you!

From: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Sent: Thursday, June 3, 2021 3:37 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Sanchez, Alexandra L shared "DRAFT (b) (5)" on Federal O&G Leasing" with you.

Yep! Will take a look tonight.

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From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, June 3, 2021 5:34:25 PM
To: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: Sanchez, Alexandra L shared "DRAFT (b) (5)" on Federal O&G Leasing" with you.



Sanchez, Alexandra L shared a file with you

Can you take a look? Any and all edits welcome.



DRAFT (b) (5) on Federal O&G Leasing



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Selected (b) (5) on Federal O&G Leasing

Overview

(b) (5)

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(b) (5)

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Cc: [Klein, Elizabeth A](#)
Subject: toolkit
Date: Tuesday, June 1, 2021 1:10:45 PM
Attachments: [TWS Toolkit Net Zero by 2030 version 2021_05.pdf](#)

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov



NET ZERO WEDGES TOOLKIT

GETTING TO NET ZERO FOSSIL FUEL GREENHOUSE GAS
EMISSIONS FROM FEDERAL LANDS AND WATERS BY 2030

May 6, 2021

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CONTEXT

The Wilderness Society (TWS) assembled this toolkit to better understand an array of action options to help make our federal public lands and waters a leading part of the climate solution. The aim is to achieve net zero greenhouse gas (GHG) emissions from fossil fuel development on federal public lands and offshore waters by 2030 and no fossil fuel development by 2050 at the latest.¹ The toolkit is the first that we know of to combine existing research across public land's roles in energy and natural systems.

We use “wedge” figures to explore combinations of potential actions across energy and natural systems that aim to reduce and offset GHG emissions stemming from fossil fuel development on federal public lands and waters. This toolkit and the wedge figures set the stage to understand: (1) a range of options to consider across energy and natural climate strategies; (2) the scale of gross federal emissions reduction or offsets from potential actions individually, and, to a large degree, in combination with other actions; and (3) the relative amount of baseline emissions remaining to be addressed by additional actions to align with getting to net zero by 2030.

It is important to understand what this toolkit does not do and know that it will continue to evolve. The order of actions in these wedge figures do not indicate prioritization. Nor do the inclusion of actions indicate an endorsement by TWS of any specific actions. This toolkit does not constitute a complete list of potential actions. Reduction estimates in the toolkit come mainly from existing external research on individual policies. These figures do not show estimates from a single integrated model and, thus, do not fully account for interactions. These figures display gross lifecycle emissions stemming from federal lands and waters, which we refer to as “federal emissions.” These reductions are important for efforts to tackle climate change, and they are also largely under direct control of the Biden administration. It is important to acknowledge, however, that a reduction in federal fossil fuel production alone would lead to a *partial* shift in production from federal to non-federal lands and waters. We include global *net* emission reductions as available in the methodology section. Actions included in this toolkit will continue to expand as new data becomes available and estimates will continue to be refined to further account for potential interactions between actions. It is our hope that the federal government will conduct comprehensive modeling using the extensive data and integrated modeling capabilities at their disposal and will make this data available for public involvement. The input from integrated models is essential for informing a comprehensive plan to pursue actions to meet critical national and global climate goals.

¹ TWS defines “net zero fossil fuel emissions” from public lands and waters as follows: when the lifecycle GHG emissions stemming from fossil fuel development on U.S. federal public lands and waters (full lifecycle – from production sites to burning by end users) over a specified period are balanced by an equal amount of GHG emissions removed from the atmosphere and a combination of responsible offsets that will be phased out as our public lands become free of fossil fuel development. “No fossil fuel emissions by 2050” is defined as no emissions (both GHG and local air pollution) stemming from fossil fuel development on federal public lands and waters, i.e., no fossil fuel development on federal public lands and waters.

This toolkit includes emissions reduction potentials of specific actions estimated by existing research studies and, unless noted, are not estimates derived from nor explicitly verified by TWS staff at this time. TWS provided financial support for independent modeling of a baseline for federal fossil fuel GHG emissions by Apogee Economics and Policy and independent modeling of oil and gas supply side policies by Resources for the Future.

Federal actions to reduce local air pollution stemming from our federal public lands are extremely important to tackle. This particular toolkit includes only GHG emissions directly in its calculations at this time. Local air pollution largely comes from practices used to burn fossil fuels at power plants to generate heat and electricity, in industrial manufacturing, and in transportation. Reducing fossil fuel production stemming from federal public lands and waters has the co-benefit of reducing local air pollution stemming from federal fossil fuels. More can and should be done to incorporate the impacts of potential actions on local air pollution as well as incorporating those costs and benefits into decision making on federal lands.

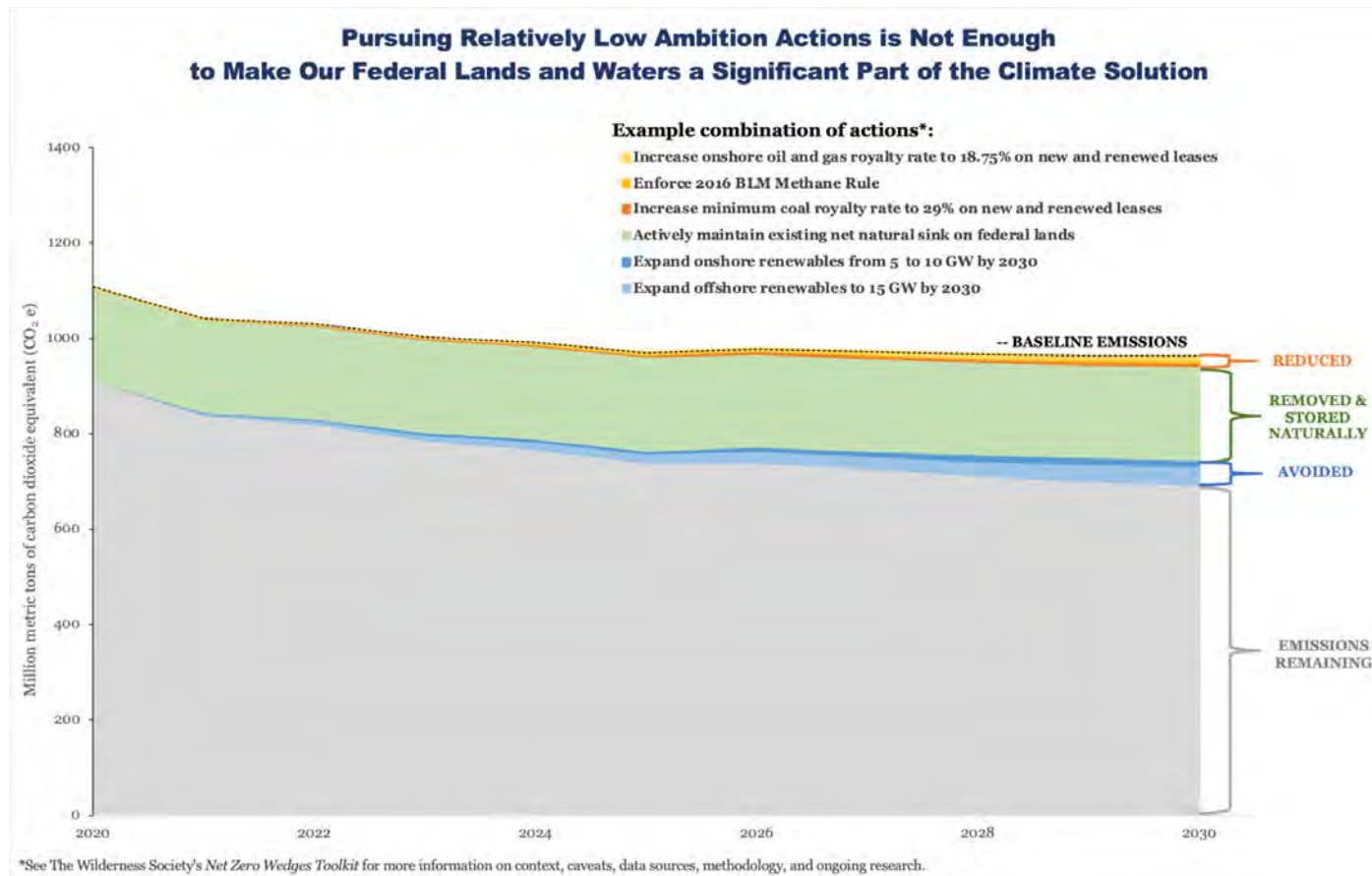
Please see the methodology at the end of this toolkit for more information on data and assumptions. Contact TWS for ongoing research.

EXAMPLE WEDGE FIGURES

Please see p. 2 of toolkit for context and caveats.

A. Relatively low ambition actions on federal lands and waters are not enough

Based on existing data, pursuing only relatively low ambition climate actions that have been considered for years would result in around 690 MMT CO₂e remaining in 2030 and would not put our public lands and waters on a path to get to net zero.



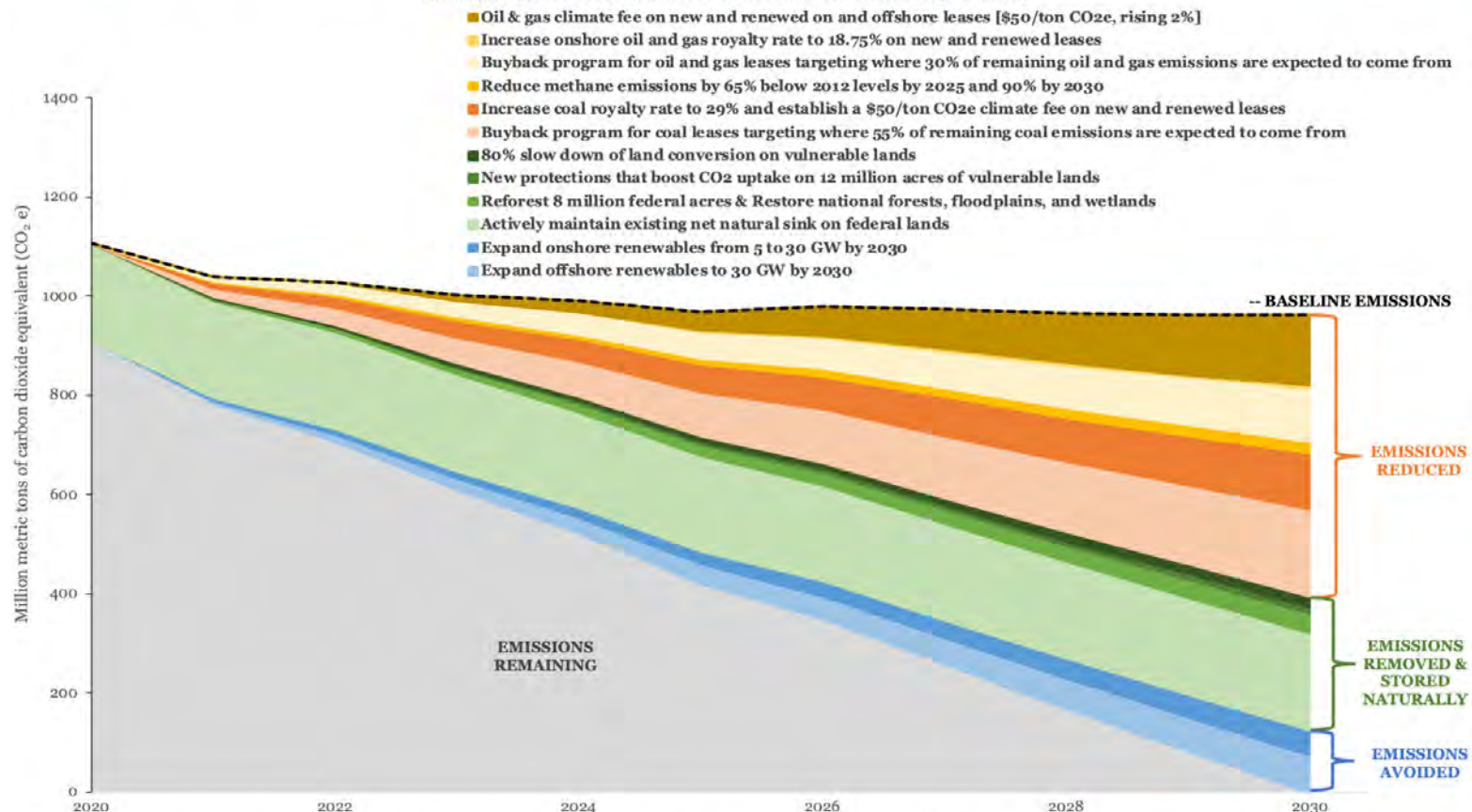
It is likely that there will be new policies at the state and national levels that continue to drive down demand for federal fossil fuel production (especially for coal in the near term) from baseline projected levels. But it is important to also look at what could be achieved by policies solely at the federal level, many under the Administration's control.

B. A combination of higher ambition actions could get us to net zero federal emissions by 2030 even without additional US-wide actions

One hypothetical combination of policies on federal lands and waters that could result in reaching net zero federal emissions in 2030 includes: instituting climate fees such as \$50 per ton of CO₂e for oil, gas, and coal, which would also create significant revenue that could be used for climate mitigation; expanding both onshore and offshore renewables to 30GW; and instituting a voluntary federal lease buyback program that scales down production at a level that aligns with a net zero target. Lease buyback programs should prioritize phasing out extraction where fuels are the most emissions-intensive, where community-involved assessments determine that local economies are most resilient, and should prioritize areas to protect indigenous rights, public health, and areas with high cultural and conservation value.²

Getting to Net-Zero Fossil Fuel Greenhouse Gas Emissions Stemming from Federal Lands & Waters by 2030

Example of one combination of actions* to tackle emissions:



*See The Wilderness Society's *Net Zero Wedges Toolkit* for more information on context, caveats, data sources, methodology, and ongoing research.

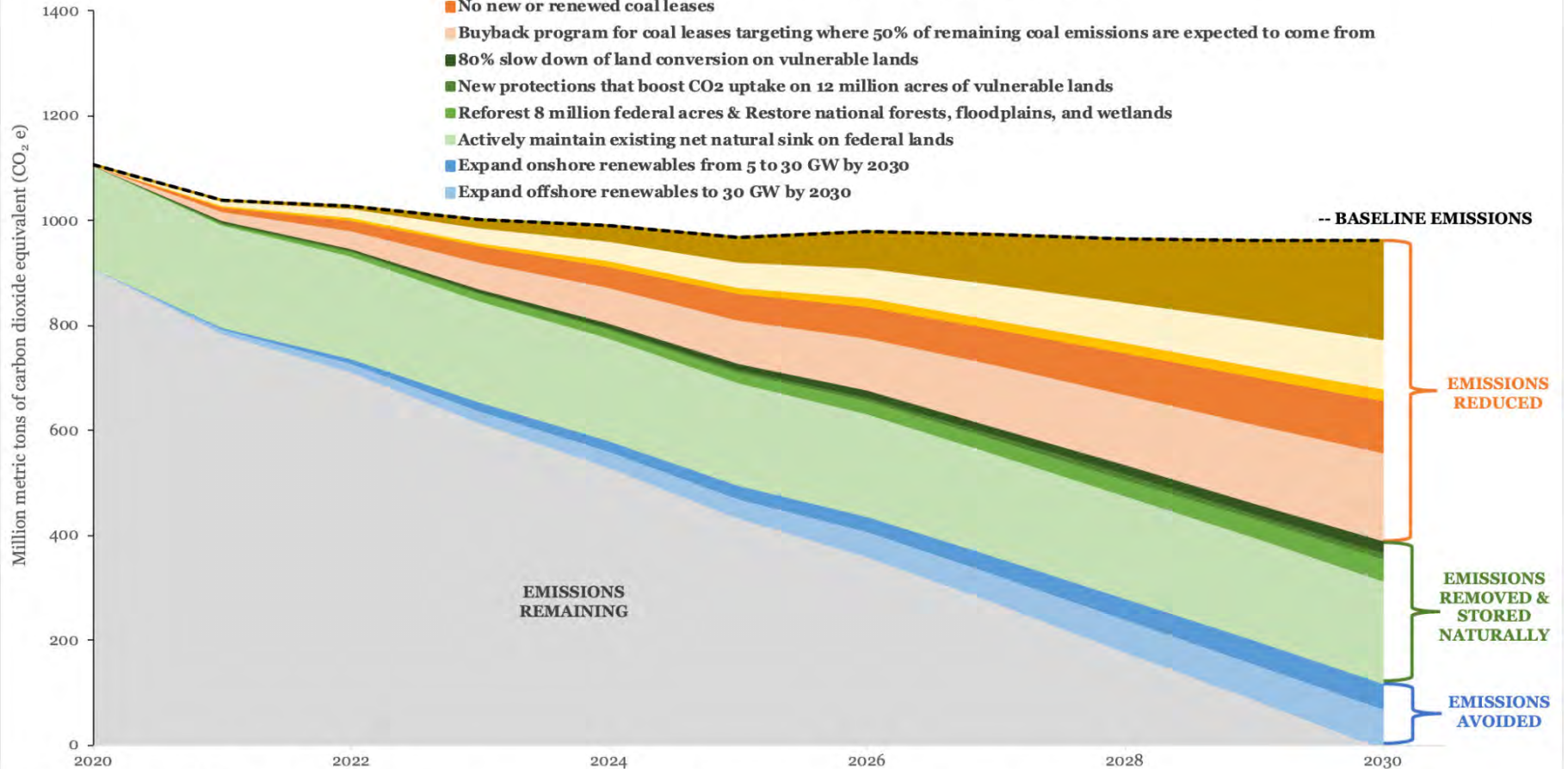
² Koski, J., Kartha, S. and Erickson, P. (2019). Principles for aligning U.S. fossil fuel extraction with climate limits. SEI Working Paper. Stockholm Environment Institute, Stockholm. <https://www.sei.org/publications/principles-for-aligning-fossil-fuel-extraction-with-climate-limits/>

C. Alternative combinations of higher ambition actions could also get us to net zero federal emissions by 2030 even without additional US-wide actions

Getting to Net-Zero Fossil Fuel Greenhouse Gas Emissions Stemming from Federal Lands & Waters by 2030

Example of one combination of actions* to tackle emissions:

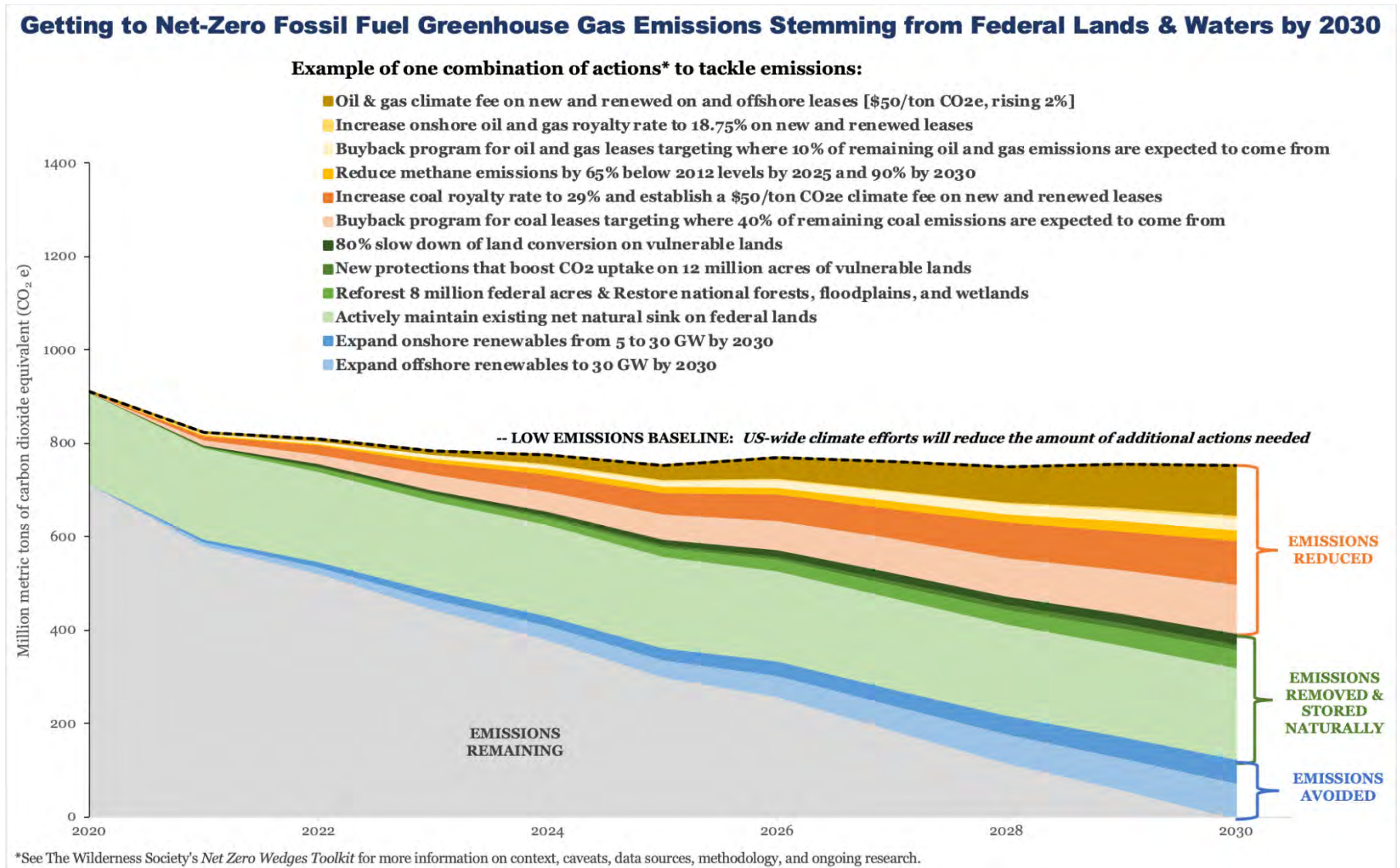
- Permanent oil & gas leasing moratorium
- Buyback program for oil and gas leases targeting where 30% of remaining oil and gas emissions are expected to come from
- Reduce methane emissions by 65% below 2012 levels by 2025 and 90% by 2030
- No new or renewed coal leases
- Buyback program for coal leases targeting where 50% of remaining coal emissions are expected to come from
- 80% slow down of land conversion on vulnerable lands
- New protections that boost CO₂ uptake on 12 million acres of vulnerable lands
- Reforest 8 million federal acres & Restore national forests, floodplains, and wetlands
- Actively maintain existing net natural sink on federal lands
- Expand onshore renewables from 5 to 30 GW by 2030
- Expand offshore renewables to 30 GW by 2030



*See The Wilderness Society's *Net Zero Wedges Toolkit* for more information on context, caveats, data sources, methodology, and ongoing research.

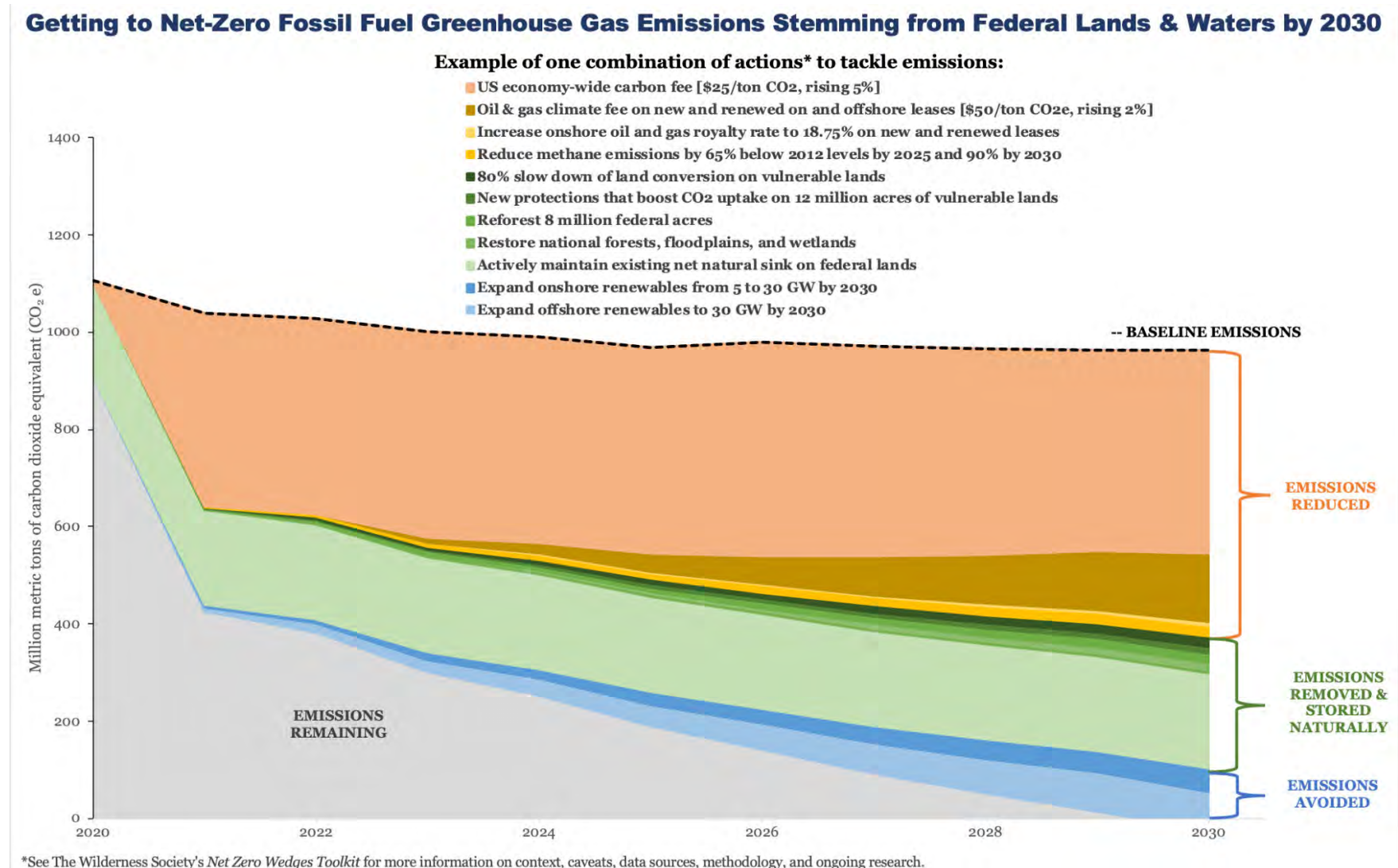
D. State and US-wide climate efforts would reduce the amount of additional actions needed to get us to net zero federal emissions by 2030

With so much climate action occurring right now at state and national levels, it is likely that these other actions will reduce demand for federal production as well. Given this, below we show the estimated reductions from a similar set of high ambition actions on federal lands and waters as Case B, but under a *Low Emissions Baseline* scenario.



E. US-wide climate efforts would reduce the amount of additional actions needed to get us to net zero federal emissions by 2030

To illustrate the impact that prominent nation-wide policy tools would have on reducing the amount and scale of additional actions that would need to occur in order to reach climate goals for federal lands, below we show the projected annual emissions reductions stemming from federal lands and waters that is expected to come from a moderately priced economy-wide carbon fee.



SUMMARY TABLE OF TOOL OPTIONS FOR WEDGE FIGURES

Please see p. 2 of toolkit for context and caveats.

Below is an evolving list of potential actions across energy and natural systems involving our federal public lands and waters. Not all tools listed below are shown in the example wedge figures included in this toolkit. While this is a useful guide, a number of tools are mutually exclusive (e.g., cannot increase base royalty rates for oil and gas leases and also pursue a permanent leasing moratorium). Please contact TWS if interested in seeing a specific combination of policy actions.

The table includes known mechanisms to enact the tool, known legal authority, estimated annual gross federal emissions reductions below baseline in the year 2030, and the research that the emissions reduction estimate is based upon. More information on the data and assumptions used to derive these estimates can be found in the extended methodology section at the end of this toolkit.

Tools to Tackle Emissions from Federal Lands and Waters				
TOOL	MECHANISM	LEGAL AUTHORITY	ESTIMATED FEDERAL REDUCTIONS BELOW BASELINE IN 2030 (MMT CO _{2e})	EXISTING RESEARCH ESTIMATE IS BASED ON
REDUCE EMISSIONS: REFORM FEDERAL FOSSIL FUEL PROGRAMS				
Increase on and offshore oil and gas royalty rate to 18.75% or 25%	<ul style="list-style-type: none"> - Impose increased royalty rate on lease issuance or renewal. - Establish royalty rate policy via Instruction Memorandum and in BLM handbook. - Increase royalty rate through legislation, e.g. Sen. Rosen & Sen Grassley's the Fair Return for Public Lands Act of 2021 (S. 264); Rep. 	<ul style="list-style-type: none"> - Onshore (competitive new leases and renewals): MLA, 30 U.S.C. § 226(b)(1)(A); 43 C.F.R. § 3103.3-1. - Offshore: OCSLA, 43 U.S.C. §§ 1332(3), 1337; 30 C.F.R. § 560.202. - FLPMA, 43 U.S.C. § 1701(a)(9). - 30 U.S.C. § 352 (applying to leases on acquired land). 	<p>6-22</p> <p>Depends if alone or combined with a climate fee: 18.75% alone: 9 25% alone: 22 18.75% with \$50 climate fee: ~6 25% with \$50 climate fee: ~15</p>	<p><u>Prest 2020</u> and <u>Prest 2021</u> supplemental results</p> <p>Also have estimates if 25% increase to base royalty rate only applied to onshore leases.</p>

	<p>Porter's the Ending Taxpayer Welfare for Oil and Gas Companies Act of 2021 (H.R. 1517), Rep. Levin's Restoring Community Input and Public Protections in Oil and Gas Leasing Act of 2021 (H.R. 1503).</p> <p>- Institute increased royalty rate via rulemaking (but existing regulation is sufficient).</p>			
<p>Charge emissions fee on new and renewed on and offshore oil & gas leases (\$50 or \$100/ton CO2e, rising 2% annually)</p>	<p>- Impose fee as compensatory mitigation in lease stipulation.</p> <p>- Incorporate into royalty rates.</p> <p>- Issue Instruction Memorandum requiring imposition of emissions fee on new and renewed leases.</p>	<p>- Onshore royalties(competitive new leases and renewals): MLA, 30 U.S.C. § 226(b)(1)(A); 43 C.F.R. § 3103.3-1 & 3101.1-3.</p> <p>- Offshore royalties: OCSLA, 43 U.S.C. §§ 1332(3), 1337; 30 C.F.R. § 560.202.</p> <p>- FLPMA, 43 U.S.C. §§ 1701(a)(8) & (9), 1702(b), (c) & (h), 1732(a) & (b).</p> <p>- MLA, 30 U.S.C. § 226(b)(1)(A).</p> <p>- <i>Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.</i>, 538 F.3d 1172, 1200 (9th Cir. 2008) (requiring valuation of carbon emissions).</p> <p>- NEPA, 42 U.S.C. §§ 4331(b), 4332(2)(C), (E) & (F).</p>	<p>131-186</p> <p>Depends if alone or in combination with increase to minimum royalty rate: \$50 alone: 131-142 \$100 alone: 186</p> <p>\$50 and 18.75% RR increase combo: 148</p> <p>\$50 and 25% RR increase combo: 145-156</p>	<p><u>Prest 2020</u> and <u>Prest 2021</u> supplemental results</p> <p>Also have estimates if fees only applied to onshore leases.</p>
<p>Compensatory mitigation emissions fee at APD stage for existing leases</p>	<p>- Impose fee as compensatory mitigation as a condition of approval on APDs.</p> <p>- Issue Instruction Memorandum requiring imposition of emissions fee on APDs.</p>	<p>- MLA, 30 U.S.C. § 226(b)(1)(A) & (g).</p> <p>- 43 C.F.R. §§ 3101.1-2 & 3101.1-3.</p> <p>- FLPMA, 43 U.S.C. §§ 1701(a)(8) & (9), 1702(b), (c), & (h), 1732(a) & (b).</p> <p>- <i>Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.</i>, 538 F.3d 1172, 1200 (9th Cir. 2008) (requiring valuation of carbon emissions).</p> <p>- NEPA, 42 U.S.C. §§ 4331(b), 4332(2)(C), (E) & (F).</p>	<p>~8% higher than reductions from emissions fee applied only on new and renewed leases</p>	<p>Based on <u>Prest 2021</u> section 2.2.3</p>

Permanent End to New O&G Leases	<ul style="list-style-type: none"> - Secretarial Order instituting a no leasing policy pursuant to the Secretary's discretion under the MLA. - BLM continually cancels quarterly lease sales in perpetuity because no lands are available for leasing under the MLA. - Rulemaking. - Legislation ending new leasing on federal public lands. 	<ul style="list-style-type: none"> - MLA, 30 U.S.C. § 226(a). - FLPMA, 43 U.S.C. §§ 1701(a)(8) & (9), 1702(b) & (c), 1732(a) & (b). - OCSLA, 43 U.S.C. § 1332(3). - NEPA, 42 U.S.C. §§ 4331(b), 4332(2)(C), (E) & (F). 	186	<u>Prest 2021</u> supplemental results
End to New O&G Drilling Permits	<ul style="list-style-type: none"> - Secretarial Order instituting a no new drilling policy pursuant to the Secretary's discretion under the MLA. - Rulemaking. - Legislation ending new leasing on federal public lands. 	<ul style="list-style-type: none"> - MLA, 30 U.S.C. § 226(a) & (g). - FLPMA, 43 U.S.C. §§ 1701(a)(8) & (9), 1702(b) & (c), 1732(a) & (b). - OCSLA, 43 U.S.C. § 1332(3). - NEPA, 42 U.S.C. §§ 4331(b), 4332(2)(C), (E) & (F). 	No current estimate available	None
Federal oil and gas lease buyback program	<ul style="list-style-type: none"> - Develop a voluntary program for buying back existing leases with appropriate and effective valuation. - Legislation to support efforts, including authorization and appropriations. 	<ul style="list-style-type: none"> - General modification of contract agreement or as settlement agreement via litigation. - NEPA, 42 U.S.C. §§ 4331(b), 4332(2)(C), (E) & (F). 	Scale lease buyback program based on projected emissions remaining to reach net zero by 2030.	None
Reduce methane emissions	<ul style="list-style-type: none"> - EPA rulemaking. - BLM rulemaking. - NTL-4A enforcement. - Enhanced guidance via an IM. 	<ul style="list-style-type: none"> - 30 U.S.C. § 225. - 43 U.S.C. §§ 1701(a)(8), 1702(b) & (c), 7411(a)(1). - 42 U.S.C. § 7411(b) and (d). - 43 C.F.R. § 3101.1-2. 	4-5-23	BLM Methane Rule 2016 EA for 4.5 MMT Reduce methane emissions below 2012 levels by 90% by 2030: 23 MMT using TWS' <u>FLEAT 2020 model</u>

	<ul style="list-style-type: none"> - Best practices in RMPs and for new leases. - APD COAs. - Legislation, e.g. H.R. 1492 (Rep. Diana DeGette) Methane Waste Prevention Act 			
Increase coal royalty rate to 29% on new and renewed leases	<ul style="list-style-type: none"> - Impose increased royalty rate on lease issuance or renewal. - Establish royalty rate policy via Instruction Memorandum and in BLM handbook. - Increase royalty rate through legislation. 	<ul style="list-style-type: none"> - FLPMA, 43 U.S.C. § 1701(a)(9). - 30 U.S.C. § 207. - 43 C.F.R. § 3473.3-2. 	6-8	Assumes a quarter of <u>CEA 2016</u> impact in year 10 to adjust for updated lease renewal profile and lower demand for federal coal lease. Range depends on if using a low or central baseline.
Charge climate fee on new and renewed coal leases (\$50 per ton CO ₂ e)	<ul style="list-style-type: none"> - Impose fee as compensatory mitigation in lease stipulation. - Incorporate into royalty rates. - Issue Instruction Memorandum requiring imposition of emissions fee on new and renewed leases. 	<ul style="list-style-type: none"> - FLPMA, 43 U.S.C. §§ 1701(a)(8) & (9), 1702(b), (c) & (h). - MLA, 30 U.S.C. §§ 201, 208, 226(b)(1)(A). - <i>Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.</i>, 538 F.3d 1172, 1200 (9th Cir. 2008) (requiring valuation of carbon emissions). - NEPA, 42 U.S.C. §§ 4331(b), 4332(2)(C), (E) & (F). 	86-105	Assumes a quarter of <u>Gerarden, Stock, Reeder 2020</u> impact in year 2030 to adjust for updated lease renewal profile and lower demand for federal coal lease. Range depends on if using a low or central baseline.
End issuing new or renewing existing coal leases	<ul style="list-style-type: none"> - Secretarial Order instituting a no leasing policy pursuant to the Secretary's discretion under the MLA. - Rulemaking. - Legislation ending new leasing on federal public lands. 	<ul style="list-style-type: none"> - MLA, 30 U.S.C. §§ 181, 182, 201. - Surface Mining Control and Reclamation Act, 30 U.S.C. §§ 1202, 1211(c). - FLPMA, 43 U.S.C. §§ 1701(a)(8) & (9), 1702(b) & (c), 1732(a) & (b). - NEPA, 42 U.S.C. §§ 4331(b), 4332(2)(C), (E) & (F). 	82-100	Assumes a quarter of the derived 2030 impact of <i>no new leases or renewals tonnage cap</i> scenario from <u>Gerarden, Stock, Reeder 2020</u> to adjust for updated lease renewal profile and lower demand for federal coal lease. Range depends on if using a low or central baseline.
Federal coal lease buyback program	<ul style="list-style-type: none"> - Develop a voluntary program for buying back existing leases with 	<ul style="list-style-type: none"> - General modification of contract agreement or as settlement agreement via litigation. - NEPA, 42 U.S.C. §§ 4331(b), 4332(2)(C), (E) & (F). 	Scale lease buyback program based on projected emissions	None

	<p>appropriate and effective valuation.</p> <ul style="list-style-type: none"> - Legislation to support efforts, including authorization and appropriations. 		remaining to reach net zero by 2030.	
REMOVE EMISSIONS: PROTECT AND ENHANCE EXISTING NATURAL SEQUESTRATION AND STORAGE				
80% slowdown of land conversion on vulnerable lands	<ul style="list-style-type: none"> - Best practices in RMPs and new leases. - Administrative withdrawals under FLPMA. - Monument designations under the Antiquities Act. - Amend Forest Plans. - Issue nationwide policy via Instruction Memorandum. - Compensatory mitigation requirement on new leases or at APD stage. 	<ul style="list-style-type: none"> - FLPMA, 43 U.S.C. §§ 1701(a)(8), 1702(a), (b), (c), (h), 1714. - NEPA, 42 U.S.C. §§ 4321, 4331, 4332. - 54 U.S.C. § 320301. - 76 Fed. Reg. 3843, 3846–47. - 36 C.F.R. Parts 218, 219. 	22	<p><u>CAP 2020</u> based on <u>CSP 2019</u>, <u>Fargione et al 2018</u>, <u>Nature4Climate</u>; and <u>USGS LandCarbon</u></p>
New protections that boost CO2 uptake on 12 million acres of vulnerable lands			12	
Reforest 8 million federal acres	<ul style="list-style-type: none"> - Best practices in RMPs and new leases. - Administrative withdrawals under FLPMA. - Amend Forest Plans. - Issue nationwide policy via Instruction Memorandum. - Compensatory mitigation requirement on new leases or at APD stage. 	<ul style="list-style-type: none"> - FLPMA, 43 U.S.C. §§ 1701(a)(8), 1702(a), (b), (c), (h), 1714. - NEPA, 42 U.S.C. §§ 4321, 4331, 4332. - 76 Fed. Reg. 3843, 3846–47. - 36 C.F.R. Parts 218, 219. 	20	<p><u>CAP 2020</u> based on <u>Fargione et al 2018</u> supplementary data; <u>Nature4Climate</u></p>

Restore national forests, floodplains, and wetlands	<ul style="list-style-type: none"> - Best practices in RMPs and new leases. - Administrative withdrawals. - Monument designations under Antiquities Act. - Issue nationwide policy via Instruction Memorandum. - Amend Forest Plans. - Compensatory mitigation requirement on new leases or at APD stage. 	<ul style="list-style-type: none"> - FLPMA, 43 U.S.C. §§ 1701(a)(8), 1702(a), (b), (c), (h), 1714. - NEPA, 42 U.S.C. §§ 4321, 4331, 4332. - 76 Fed. Reg. 3843, 3846–47. - 36 C.F.R. Parts 218, 219. 	21	<u>CAP 2020</u> based on <u>Fargione et al 2018</u> supplementary data; <u>USFS 2012</u> for baseline
Actively maintain existing net natural land sink	<ul style="list-style-type: none"> - Best practices in RMPs and new leases. - Administrative withdrawals. - Monument designations under Antiquities Act. - Issue nationwide policy via Instruction Memorandum. - Amend Forest Plans. - Compensatory mitigation requirement on new leases or at APD stage. 	<ul style="list-style-type: none"> - FLPMA, 43 U.S.C. §§ 1701(a)(8), 1702(a), (b), (c), (h), 1714. - NEPA, 42 U.S.C. §§ 4321, 4331, 4332. - 54 U.S.C. § 320301. - 76 Fed. Reg. 3843, 3846–47. - 36 C.F.R. Parts 218, 219. 	195	<u>Merrill et al 2018</u>
Actively maintain and enhance existing net natural sink for public waters	<ul style="list-style-type: none"> - Best practices in RMPs and new leases. - Administrative withdrawals. - Monument designations under Antiquities Act. 	<ul style="list-style-type: none"> - FLPMA, 43 U.S.C. §§ 1701(a)(8), 1702(a), (b), (c), (h), 1714. - NEPA, 42 U.S.C. §§ 4321, 4331, 4332. - 54 U.S.C. § 320301. - 40 C.F.R. § 122.26(a)(9)(i)(C), (D). - 76 Fed. Reg. 3843, 3846–47. - 36 C.F.R. Parts 218, 219. 	No current estimate available	Estimates for aquatic sequestration baseline not available

	<ul style="list-style-type: none"> - Issue nationwide policy via Instruction Memorandum. - Compensatory mitigation requirement on new leases or at APD stage. 			
AVOID EMISSIONS: EXPAND RESPONSIBLE RENEWABLE DEVELOPMENT				
Expand onshore renewables from 5 to 30 GW by 2030	<ul style="list-style-type: none"> - Best practices in RMPs. - Agency permitting prioritization. 	<ul style="list-style-type: none"> - 42 U.S.C. § 13311-13317. - 43 U.S.C. §§ 1702(c), (h). - 43 C.F.R. Parts 2800, 2880 	31-51	<u>HR 133 2021 spending bill</u> set a target to permit at least 25GW of new renewables on federal land by 2025; continued progress could reach 30 GW by 2030. Assume historic shares by renewable type stays constant: 52% utility scale solar PV, 22% wind, and 26% geothermal.
Expand offshore renewables to 30 GW by 2030	<ul style="list-style-type: none"> - Agency permitting prioritization. 	<ul style="list-style-type: none"> - 42 U.S.C. § 13311-13317. - 43 U.S.C. §§ 1337, 1344(a)(1). - 30 C.F.R. §§ 585.100-585.1019 	76	30 GW offshore wind deployment by 2030 is current <u>Biden Administration commitment</u>

METHODOLOGY

Baseline Historic and Projected Emissions

Baseline historic (2005-2019) federal fossil fuel emissions: For historic emission calculations we use TWS' Federal Lands Emissions Accountability Tool (FLEAT) results modeled by Apogee EP.³ FLEAT aggregates historic (2005-2019) production from federal lands and waters collected by the Office of Natural Resource Revenue.⁴ The model then creates an emissions profile for each of the five fuel sources [onshore oil, offshore oil, onshore gas, offshore gas, and coal], based on the methodology used in the Environmental Protection Agency's Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2018, which includes carbon dioxide, methane, and nitrous oxide.⁵ To calculate downstream emissions, we multiply production volumes by sector specific energy flows from EIA's Annual Energy Review⁶ and apply sector specific emission factors derived by multiplying average annual heat content by fuel type and consuming sector from EIA by EPA's emission factors by gas or carbon content coefficient by fuel type.⁷ To calculate upstream and midstream emissions by fuel type, we scale down EPA's national-level, fuel- and segment-specific emissions data using a ratio of federal production to EIA national production.

Baseline projected (2020-2030) federal fossil fuel emissions: For onshore and offshore oil and gas, we use Prest 2021 supplemental results for baseline projections.⁸ For coal, we use FLEAT 2020 central federal coal production projection estimates. Apogee EP imputes future federal coal production to 2030 via a regularized synthetic control method⁹ using forecasts from the reference case scenario in the EIA's Annual Energy Outlook 2020 as control variables.¹⁰ Same as with historic emissions, we calculate associated lifecycle greenhouse gas emissions based on EPA calculation methods and assumptions employed by the EPA Inventory. We combine FLEAT 2020 predicted coal emissions, with Prest 2021 onshore and offshore oil and gas predicted emission estimates to obtain total projected federal fossil fuel baseline emissions estimates from 2020 to 2030.

Low production alternative baseline: This toolkit focuses on federal actions that are largely under the Administration's control that can reduce emissions, but economy-wide actions such as a clean energy standard for the power sector and higher fuel economy standards have the

³ <https://www.wilderness.org/articles/article/federal-lands-emissions-accountability-tool>

⁴ US Office of Natural Resources Revenue (2020) Calendar year production data (2005-2019). US Department of the Interior, ONRR. https://revenue.data.doi.gov/downloads/production/calendar_year_production.xlsx

⁵ US Environmental Protection Agency (2020) Inventory of US Greenhouse Gas Emissions and Sinks: 1990-2018. US EPA 430-R-20-002. <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>

⁶ US Energy Information Administration (EIA) (2020) Annual Energy Review. <https://www.eia.gov/totalenergy/data/annual/>

⁷ US EPA (2018) EPA emission factors for greenhouse gas inventories. Modified 9 March 2018.

https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_o.pdf

⁸ Prest B (2021) Supply-side reforms to oil and gas production on federal lands: Modeling the implications for climate emissions, revenues, and production shifts. Resources for the Future. Working Paper 20-16. Updated March 2021

https://www.rff.org/documents/2872/WP_20-16_Updated.pdf

⁹ Doudchenko N, Imbens G (2016) Balancing, Regression, Difference-In-Differences and Synthetic Control Methods: A Synthesis.

<https://arxiv.org/abs/1610.07748>.

¹⁰ US Energy Information Administration (EIA) (2020a) Annual Energy Outlook 2020. <https://www.eia.gov/outlooks/aeo/>

potential to substantially lower the baseline projected production and thus the baseline emissions.¹¹ To account for the uncertainty of US-wide climate actions that are currently under debate, in some wedge versions we show the estimated reductions from a set of actions using a *Low Emissions Baseline* scenario. The *Low Emissions Baseline* scenario uses FLEAT 2020 low projection estimates for coal and a 25% reduction from Prest 2021 baseline for oil and gas emissions. In turn, we assume a subsequent 25% reduction from estimated annual impacts of oil and gas supply-side actions that are based on Prest 2021.¹²

Baseline ecosystem carbon emissions: For baseline land use emissions we use 2005-2014 annual average ecosystem carbon emissions fluxes (harvesting, wildfire, and other carbon removals due to land use, land-use change and disturbance such as agricultural production and urbanization losses) from Merrill et al 2018.¹³ These emissions are baked into the “maintain existing net natural sink” wedge.

Tools to Reduce Federal Fossil Fuel Emissions

Oil and Gas

Estimates for oil and gas tools are based on Prest 2020 and Prest 2021 supplemental annual results.¹⁴ Increasing royalty rates to 18.75% for new and renewed oil and gas leases would reduce federal emissions by between 16 and 24 MMT of CO₂e on average out to 2050 (or between 4 to 7 annual average global emissions reductions) and would raise an additional \$1 to \$2.1 billion in federal revenues per year compared to business as usual.¹⁵ Increasing royalty rates to 25% for new and renewed onshore and offshore oil and gas leases would reduce federal emissions by between 37 and 57 MMT of CO₂e on average out to 2050 (or between 10 and 17 annual average global emissions reductions) and would raise an additional \$2.6 to \$5.3 billion in federal revenues per year compared to business as usual.¹⁶ Instituting a permanent moratorium on new and renewed onshore and offshore oil and gas leases would reduce federal emissions by between 314 and 460 MMT of CO₂e on average out to 2050 (or between 85 and 147 annual average global emissions reductions), but would reduce annual federal revenues by between \$5.5 and \$11.1 billion per year compared to business as usual.¹⁷

¹¹ For more information on economy-wide standards and methods to achieving Biden’s commitment to decarbonize the electricity sector by 2035, see Goldman School of Public Policy, *2035: The Report*, University of California Berkeley (June 2020), available at: <https://www.2035report.com/>; see also Strokes, L., et al, *A Roadmap to 100% Clean Electricity by 2035*, Evergreen Collaborative (February 2021), available at: <https://www.filesforprogress.org/memos/evergreen-ces-report.pdf>

¹² 25% reduction is in line with the difference between EIA’s Annual Energy Outlook 2021 *Reference* case and *Low oil and gas supply* case for year 2030. <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=1-AEO2021%20%AEion=0-0&cases=ref2021~lowogs~aeo2020ref&start=2010&end=2050&f=A&sourcekey=0>

¹³ Merrill MD et al (2018) Federal Lands Greenhouse Emissions and Sequestration in the United States — Estimates for 2005–14: US Geological Survey Scientific Investigations Report 2018–5131. <https://doi.org/10.3133/sir20185131>

¹⁴ Prest B (2020) Supply-side reforms to oil and gas production on federal lands: Modeling the implications for climate emissions, revenues, and production shifts. Resources for the Future. Working Paper 20-16. Original paper release September 2020: https://media.rff.org/documents/RFF_WP_20-16_Prest.pdf?_ga=2.8733237.1240995157.1618309948-1103774153.1607126855 and Prest 2021. RFF WP 20-16 updated on March 15, 2021. https://www.rff.org/documents/2872/WP_20-16_Updated.pdf

¹⁵ Prest 2021. Table 1, p.25 and Table A.9, p.65

¹⁶ Prest 2021. Table 1, p.25 and Table A.9, p.65

¹⁷ Prest 2021. Table 1, p.25 and Table A.9, p.65

Another supply-side policy option is to implement a fee per ton of CO_{2e} that is pegged to production. The amount that a climate fee should be depends on the desired outcomes. A \$50/ton CO_{2e} fee applied to new and renewed oil and gas leases would reduce annual federal emissions by between 225 and 292 MMT of CO_{2e} on average out to 2050 (or between 61 to 69 annual average global emissions reductions) and would raise an additional \$2.9 to \$5.9 billion in federal revenues per year compared to business as usual.¹⁸ A \$100/ton CO_{2e} fee represents a fee that is close to or equivalent to the production and emissions impacts that would come from a permanent leasing moratorium. Prest and Stock 2021 also look at the impact of charging distinct oil and gas climate fees.¹⁹ The highest that they modeled, a \$90/ton CO_{2e} oil climate fee and a \$50/ton CO_{2e} gas climate fee would combined have the same impact on emissions reductions as a permanent leasing moratorium.

If the desired policy outcome is to maximize global emission reductions but to not go below business-as-usual federal revenue from the federal oil and gas programs, then a policymaker would choose a \$50 climate fee/ton on gas and a \$70 climate fee/ton on oil.²⁰ This would mean an increase in revenue of about \$400 million per year above BAU and result in around 71-123 MMT CO_{2e} in average global emission reductions per year out to 2050 (based on leakage rates that translates to 258 MMT CO_{2e} annual average reduction in gross federal emissions). There are a number of distinct oil and gas carbon fee combinations that would get relatively close to the same amount of global emission reductions without losing money from a BAU scenario, e.g., a fee on gas at about \$15 per ton and a fee on oil around \$80 per ton would still mean an increase in revenue of about \$200 million per year above BAU and result in around 70-123 MMT CO_{2e} in global emission reductions over 30 years.

To estimate impact of applying a climate fee on all new drilling permits for onshore and offshore oil and gas, we apply Prest's finding that being able to apply the policies modeled in his paper to all new wells would result in around an 8% increase in cumulative emissions reductions compared to federal emission reductions that would come from being able to apply an oil and gas climate fee only to new leases.²¹

Methane

We currently include two options to represent a high- and low-end range of federal methane emission reduction potential that could stem from actions impacting lifecycle methane emissions from oil and gas production coming from federal public lands and waters in 2030. For reference, FLEAT estimates baseline federal lifecycle oil and gas methane emissions in 2030 to total more than 27 MMT CO_{2e} (using a global warming potential of 25).²²

¹⁸ Prest 2021. Table 1, p.25 and Table A.9, p.65

¹⁹ Prest B. Stock J H. (2021) Climate Royalty Surcharges. NBER Working Paper 28564. Cambridge, MA. <http://www.nber.org/papers/w28564>

²⁰ See tables 4 and 5. Prest B. Stock J H. (2021) Climate Royalty Surcharges. NBER Working Paper 28564. Cambridge, MA. <http://www.nber.org/papers/w28564>

²¹ Prest 2021 section 2.2.3

²² To facilitate comparisons to US-wide emissions, we use the same global warming potentials as the EPA uses for the annual Inventory of US Greenhouse Gas Emissions and Sinks submitted each year to the UNFCCC. For more on why the EPA uses the IPCC AR4 GWP values in the US inventory see: <https://www.epa.gov/ghgemissions/understanding-global-warming-potentials#Learn%20why>

For a high-end estimate we model the methane emissions reductions that would be required to be in line with the goal included in the Methane Waste Prevention Act of 2021 -- reduce lifecycle oil and gas methane emissions in 2025 to levels at least 65% below 2012 levels and in 2030 to levels at least 90% below 2012 levels.²³ We use FLEAT calculations for 2012 lifecycle methane emissions stemming from oil and gas production on public lands and waters (42.8 MMT CO₂e in 2012) and reducing 2025 methane emissions (baseline 2025 expected to be 28.1 MMT CO₂e in 2025) by 65% below 2012 levels by 2025 (65% below 2012 levels by 2025 $[42.8-(42.8*0.65)=15]$ means reduce expected 2025 levels by 15 MMT. If baseline 2025 methane emissions are 28.1 MMT CO₂e, then a 15 MMT reduction would mean reaching 13.1 MMT in 2025 $[28.1-15=13.1]$. Then, 90% of 2012 levels by 2030 $[42.8-(42.8*0.9)=4.3]$ would mean methane emissions would not exceed 4.3 MMT in 2030. (given that baseline projected methane emissions are 27.2 MMT CO₂e, then that would mean reducing baseline methane emissions by at least 22.9 MMT CO₂e in 2030 $[27.2-4.3=22.9]$).

Emission estimates weigh methane by their 100-year global warming potential.²⁴ FLEAT assumes methane leakage rates based on EPA official inventory methods; these likely underestimate emissions. EPA revised its methane emissions methodology in 2019 to show a 1.1% leakage rate for the natural gas system, which is below top-down estimates of 2.36%.²⁵

The BLM's 2016 Waste Prevention Rule (commonly referred to as the BLM Methane Rule), imposed new regulations on natural gas producers to reduce wasted gas (methane emissions), on federal public lands from venting, flaring, and leaks.²⁶ Due to a series of administrative and judicial interventions, the rule was never fully implemented and on October 8, 2020 a US District Court vacated the vast majority of the rule -- including the parts pertaining to the loss of gas through venting, flaring, and leaks.²⁷ (The effect of the ruling is that venting, flaring, and avoidably/unavoidably lost determinations are subject to NTL-4A.) The Biden administration has announced a clear intention to pursue actions to reduce methane emissions in the US including from federal public lands and waters.

For a low-end range of methane emission reductions, we currently use a proxy that would only address a portion of reduction potential targeting upstream, onshore federal oil and gas production. The 2016 Waste Prevention Rule EA found that upon full implementation the rule would prevent an estimated 4.5 MMT CO₂e of methane emissions per year from oil and gas

²³ Methane Waste Prevention Act of 2021. Introduced in House on 2 March 2021. Sec. 2(a)(1) and (a)(2).

<https://degette.house.gov/sites/degette.house.gov/files/DeGette%20Methane%20Waste%20Prevention%20Act%202010302.pdf>

²⁴ Intergovernmental Panel on Climate Change (2007) TS.2.5 Net Global Radiative Forcing, Global Warming Potentials and Patterns of Forcing. In Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

https://archive.ipcc.ch/publications_and_data/ar4/wg1/en/tssts-2-5.html

²⁵ Alvarez R et al (2018) Assessment of methane emissions from the U.S. oil and gas supply chain. Science. 361, 6398: 186-88.

<http://doi.org/10.1126/science.aar7204>

²⁶ BLM, Waste Prevention, Production Subject to Royalties, and Resource Conservation, 81 Fed. Reg. 83,008, 83,008 (Nov. 18, 2016).

²⁷ Parts vacated included all of 43 C.F.R. subpart 3179 and the waste minimization plan requirement of 43 C.F.R. §3162.3-1(j). This case is on appeal as of April 2021.

production on federal lands.²⁸ The 2016 EA assumed that the EPA 2016 rule targeting new sources was in place and removed any overlap. As such, a rule that addresses both existing and new sources from oil and gas production on federal public lands (and waters) would reduce more than the 4.5 MMT CO₂e estimated in the 2016 EA. More will be done to improve this estimate based on modeling of new proposed actions, current methane emission projections, and the estimated impact of specific proposed actions in as much as it would entail tighter restrictions or cover more sources that enacted state regulations.

Coal

Between 2005 and 2019, 39% of US coal production came from federal lands. The single largest basin for federal coal production is the Powder River Basin (PRB) in Wyoming and Montana. Coal from those two states made up over 89% of federal coal in 2019 and it is almost entirely surface-mined. The DOI has broad statutory discretion in setting royalty rates for new or renewed leases, although they cannot be changed on existing leases.²⁹ There has been little demonstrated demand for new federal coal leases since 2016 and future demand for new federal coal leases regardless of policy is unclear. Increasing royalty rates or adding a climate fee for federal coal will only be able to reduce emissions if there is demand for new coal leases or still demand for renewed leases. Yet, in 2019, 2020, and 2021 the US Energy Information Administration (EIA) projects that US coal production in the PRB will stabilize unless new regulations are implemented.³⁰

Like for oil and gas, for federal coal we include a number of distinct policy options. Gerarden, Stock, Reeder 2020, estimate a 96.7% decline in PRB coal production and a 13% decline in U.S. power sector emissions in 2030 compared to baseline due to a federal coal climate surcharge set at approximately 100% the value of the social cost of carbon.³¹ Gerarden et al 2020 assumes that policies start to be implemented in 2016 and although original lease terms are 20 years, the authors use linear approximation modeling to apply a federal lease renewal profile and assume that 100% of leases weighted by tonnage would be covered by these policies as of 2025 (year 10). Similarly CEA 2016 uses a 10 year horizon and estimates that increasing federal coal royalty rates to 29% in 2016 would result in a 7% decrease in federal coal production and an annual decrease in US-wide emissions of 32 million metric tons of CO₂ after year 10.³² To approximate what an updated lease renewal profile means as of 2021, we turn to Figure 2 in

²⁸ US Department of the Interior, Bureau of Land Management. (10 Nov 2016). Environmental Assessment: Waste Prevention, Production Subject to Royalties, and Resource Conservation DOI-BLM-WO-WO2100-2017-0001-EA. <https://downloads.regulations.gov/BLM-2016-0001-0128/content.pdf>

²⁹ Title 30, Section 207(a) of the US Federal Code states conditions on federal leases; also see Krupnick, Alan, Joel Darmstadter, Nathan Richardson, and Katrina McLaughlin. 2015. "Putting a Carbon Charge on Federal Coal: Legal and Economic Issues." Resources for the Future Discussion Paper 15-13.

³⁰ US Energy Information Administration (EIA). 2019. Annual Energy Outlook 2019: With Projections to 2050. <https://www.eia.gov/outlooks/aeo/pdf/aeo2019.pdf>.

³¹ Gerarden TD, Reeder WS, Stock JH (2020) Federal Coal Program Reform, the Clean Power Plan, and the Interaction of Upstream and Downstream Climate Policies. American Economic Journal: Economic Policy 12(1): 167–199. <https://doi.org/10.1257/pol.20160246>

³² Executive Office of the President of the United States, Council of Economic Advisers (CEA), The Economics of Coal Leasing on Federal Lands: Ensuring a Fair Return to Taxpayers (Washington, D.C.: June 2016). https://obamawhitehouse.archives.gov/sites/default/files/page/files/20160622_cea_coal_leasing.pdf

Although on p.5 these 32 million metric tons in annual emission reductions are described as net decrease in total nationwide emissions, Table 2 on p. 26 refers to 32 MMTCO₂/year as the "direct reduction from reduced coal use nationwide." Based on the methodology described in the paper, it appears this accounts both for small shifts to nonfederal coal and overall reductions in US coal consumption and reduced emissions due to shifts to other fuel sources for power generation.

Gerarden et al 2020 that shows the federal coal lease renewal profile as of January 2016 based on BLM data compiled by Headwaters Economics. At year 5 (2021 in Gerarden et al 2020 Figure 2), approximately half of the leases weighted by tonnage would have already been readjusted (typically by renewal) and that leaves about half of the remaining leases weighted by tonnage to come up for renewal in the next 15 years. Based on the data in the figure, approximately 95% of leases weighted by tonnage would come up for readjustment by year 14 (2030) and all would come up for readjustment by year 17 (2033). To adjust for the updated approximated federal coal lease renewal profile, we assume that half of the impact of actions estimated by Gerarden et al 2020 and CEA 2016 could be reached by 2030 if policies begin in 2021 rather than 2016.

To improve these estimates, we need to know the actual demand for coal lease renewals (weighted by tonnage) since January 2016, the amount of tonnage remaining that could be covered by these policies, and updated demand for new and renewed federal coal leases. There is a lot of uncertainty about the impact of policies on new federal coal leases with the last new sales reported by DOI being in 2017 and it is difficult to find public data on annual changes in federal lease renewals. Even though our baseline remains based on AEO projections that show demand for coal in the PRB remaining high absent new policies and the numerous uncertainties that we outline above, for now we remain conservative and assume that there is only half of the historic demand for new and renewed federal coal leases. When combining this assumption to account for decreased demand for new and renewed federal coal leases with the updated coal lease renewal profile weighted by tonnage, we assume that these policies that can only be applied to new and renewed federal coal leases would have 25% of the impact in year 10 as what was estimated by Gerarden et al 2020 and CEA 2016. In other words, we assume a 1.75% reduction in 2030 federal coal production due to increasing base royalty rates to 29% (as opposed to the 7% reduction found by CEA 2016) and we assume a 24.2% reduction in 2030 federal coal production due to a climate fee charging the full social cost of carbon added on to royalty rate fees (as opposed to the 97.6% reduction found by Gerarden et al 2020).

To estimate the impact of a policy in which the federal government issues no new coal leases and stops renewing existing federal coal leases, we use Gerarden et al 2020 quantity limit policy scenario that finds a *no new leases or renewals* scenario would result in a 90.43% reduction in PRB coal in 2040 and 15.2% decline in US-wide power sector emissions from a *business-as-usual no surcharge and no CPP* scenario. To derive what that estimate would have been for the impact by year 2030, we apply the 2030 versus 2040 share of PRB production reduction for the *100% SCC surcharge and no CPP* scenario compared to baseline. We find that a *no new leases or renewals* scenario would result in around a 92% decline in PRB coal production in 2030.³³ Again, same as with the other cases that are based on assumed demand for new and renewed federal coal leases as of 2016, we assume only 25% of Gerarden et al 2020

³³ Gerarden et al 2020. Table 6, p.193 for *no new leases or renewals* scenario and derived 12.34% decline in year 2030 based on impact of *100% SCC surcharge and no CPP* case for 2040 in Table 6 vs for 2030 in Table 4. The IPM results found approximately 0.81 of the impact in 2040 would occur by 2030. As such, approximately 12.3% reduction (0.81×0.152) would be estimated for the emissions reductions achieved by 2030 for a *no new leases or renewals* policy.

impact to adjust for an updated lease renewal profile and a lower demand for coal lease readjustments.

To illustrate the impact that prominent nation-wide policy tools would have on reducing projected annual emissions stemming from federal lands, we include an economy-wide carbon fee policy based on EIA's AEO 2020 *\$25 carbon fee* side case.³⁴ We apply the annual percent change to PRB coal production between AEO 2020 *reference case* and AEO 2020 *\$25 carbon fee* side case to the FLEAT 2020 coal baseline. AEO 2020 *\$25 carbon fee* side case assumes economy-wide implementation of a \$25 per MT of carbon dioxide starting in 2021. The fee increases annually by 5% (in real dollars). AEO 2020 assumes that the revenues are distributed back to consumers via lump-sum payments. Although there will be some change to federal oil and gas production as well in the first decade, the majority of the impact of this economy-wide fee is on coal production. We estimate less than a 1% change to the other federal fuel types out to 2030 due to this policy.

Tools to Protect & Enhance the Existing Natural Carbon Sink on Federal Lands

In November 2018 the USGS published a study estimating the net greenhouse gas emissions of federal lands, including ecosystem carbon emissions and sequestration on those lands.³⁵ Merrill et al. (2018) estimates terrestrial ecosystems (forests, grasslands, and shrublands) on federal lands sequestered an average of 195 MMT CO₂e/year between 2005 and 2014 when accounting for interannual flux. For now, we assume that going forward actions that would maintain this existing annual average net natural carbon sink on US onshore federal lands.

Next we include the estimated impact from existing research on what 5 distinct actions could have to enhance the federal onshore natural carbon sink via new protections, reforestation, and restoration. Both the level of actions and resulting impacts are directly pulled from calculations done by Center for American Progress (CAP) reported in 2020 that are specific to actions entirely focused on federal public lands.³⁶ Based on existing data and available research CAP estimates that a combination of five additional actions that can enhance the existing natural sink on federal public lands -75 MMT CO₂e in 2030. Below is an overview of the data and research used for CAP's calculations of each action.

CAP calculations include two actions that require additional protections including: (1) new protections that force land conversion to slow down by 80% on vulnerable lands to avoid conversion of more than 1.2 million acres of forests and other natural areas that otherwise would have been cleared for human use by 2030 and (2) additional land protections that boosts future sequestration potential of the 12 million acres of vulnerable lands. To estimate the emissions

³⁴ US Energy Information Administration (EIA) (2020b) Annual Energy Outlook 2020: Alternative Policies. Released 5 March 2020. https://www.eia.gov/outlooks/aeo/section_issue_policies.php

³⁵ Merrill et al. 2018

³⁶ Richards R. (2020) The Plan for a 100 Percent Clean Future Must Include Saving Nature. Center for American Progress (CAP). 11 August 2020. <https://www.americanprogress.org/issues/green/reports/2020/08/11/489154/plan-100-percent-clean-future-must-include-saving-nature/>

reductions impacts of both these actions that involve additional protections, CAP offers the following explanation of its methodology:

The climate benefits of new protections for lands were calculated in two parts: the quantity of emissions avoided by protecting lands that would be lost to development between now and 2030 and the amount of greenhouse gases sequestered in 2030 by these same lands. Both components are based on observed trends in natural area loss and generalized per-acre estimates for annual sequestration rates and stored aboveground carbon in the United States.

To account for additionality, the only lands considered in calculations were those that can be reasonably expected to be converted for development by 2030, absent new protections. CAP based these calculations on analyses made by Conservation Science Partners³⁷ of natural area loss from 2001 to 2017 and assume that this trend will continue through 2030. It was assumed that the pursuit of a 30×30 goal would not completely offset development patterns, and therefore estimate that only 80 percent of natural area loss will be avoided through new land protections by 2030. This estimate is much lower than the full extent of new protections needed to achieve a 30 percent goal because not all of the land that would be protected in pursuit of a 30×30 goal would have otherwise been lost to development by 2030.

The per-acre estimates of both carbon storage and annual sequestration draw on peer-reviewed research and other publicly available data for ecosystems in the United States.³⁸ CAP generalized these estimates because the specific locations of avoided natural area losses between now and 2030 are unknown.

CAP estimates the impact of reforesting 8 million acres on federal lands -- an amount chosen to reflect the land's historical natural state -- by using peer-reviewed spatial analyses to estimate the baseline area on federal lands that were historically forested but currently have no tree cover.³⁹ The authors base annual sequestration in 2030 on acres that would need to be planted between now and 2030 to reforest 8 million acres, and uses sequestration rates from Fargione et al 2018 supplementary data.

Finally, CAP calculates the net federal emissions reductions of two restoration actions that we include in this toolkit: (1) increasing restoration investments in order to restore at least 6 million

³⁷ CAP 2020 Endnote 9: Conservation Science Partners (2019) Methods and approach used to estimate the loss and fragmentation of natural lands in the conterminous U.S. from 2001 to 2017. Technical report. Truckee, CA. https://www.csp-inc.org/public/CSP_Disappearing_US_Tech_Report_v101719.pdf.

³⁸ CAP 2020 Endnote 28: Sources include online resources and peer-reviewed literature, including Nature4Climate, "U.S. State Mapper," available at <https://nature4climate.org/u-s-carbon-mapper/> (last accessed August 2020); Fargione and others, "Natural climate solutions for the United States" <https://advances.sciencemag.org/content/4/11/eaat1869>; U.S. Geological Survey, "LandCarbon," available at https://www.usgs.gov/mission-areas/land-resources/science/landcarbon?qt-science_center_objects=0#qt-science_center_objects (last accessed August 2020).

³⁹ CAP 2020 Endnote 29: Nature4Climate, "U.S. State Mapper," available at <https://nature4climate.org/u-s-carbon-mapper/> (last accessed August 2020); Sample, "Potential for Additional Carbon Sequestration through Regeneration of Nonstocked Forest Land in the United States."

acres of national forests per year, and (2) restoring floodplains and wetlands. CAP bases annual average sequestration estimates for forest and wetland restoration activities from Fargione et al 2018 supplementary data. CAP estimates acreage gained from specific activities based on increases above reported baselines and potential acreage still needing restoration in each of these ecosystems based on reports by the US Forest Service⁴⁰ (65-82 million acres of national forest land need restoration and 2-4 million acres of restoration work each year) and from the US Environmental Protection Agency⁴¹ (around half of remaining US wetlands need restoration).

Tools to Ramp up Responsible Renewables and Aid US Transition to Decarbonized Electricity Grid by 2035

A lot of work has to come from supply- and demand-side actions in order to achieve the rapid transition to a low carbon energy system that is needed to bring US emissions in line with what is needed for a chance to avoid a 1.5°C rise in global temperatures by 2100. Renewable generation projects in the US have to dramatically ramp up in order to meet top climate targets -- to achieve 50-52% below 2005 GHG levels by 2030 (the new US NDC), 100% decarbonization of the US electricity grid by 2035, and net-zero emissions in the US by 2050. According to Princeton's Net-Zero America Project, achieving 100% decarbonization of the US electricity grid by 2035 requires that 60% of the US grid come from wind and solar generation by 2035.⁴² For reference, we are currently at about 10% of the US grid being wind and solar. The Zero Carbon Action Plan found that to achieve Biden's goal of net-zero emissions by 2050 the US will need to add renewable generation capacity by an average of 100 gigawatts every year until 2050 to increase from the 2020 level of 284 GW⁴³ of renewable generation capacity in the US to 3,000 GW by 2050.⁴⁴ This new generating capacity will mostly be from wind and solar.

Achieving this level of renewable energy expansion will require massive actions in the next 10 years and US federal public lands and waters have much to contribute. This toolkit includes various ambitions for renewable generating capacity expansions by 2030 for both onshore and offshore, but it does not explicitly delineate the numerous actions needed to invest in incentives and infrastructure necessary to responsibly expand both onshore and offshore federal renewable generating capacity by 2030. Demand side actions to meet these clean energy priorities include: renewable energy subsidies, massive investment in infrastructure expansion for wind and solar transmission, investment in expansion of electric vehicle charging stations, and emission

⁴⁰ CAP 2020 Endnote 30: U.S. Forest Service, "From Accelerating Restoration To Creating and Maintaining Resilient Landscapes and Communities Across the Nation: Update on Progress From 2012"; U.S. Forest Service, "Increasing the Pace of Restoration and Job Creation on Our National Forests" (Washington: U.S. Department of Agriculture, 2012), available at

https://www.fs.usda.gov/sites/default/files/media/types/publication/field_pdf/increasing-pace-restoration-job-creation-2012.pdf

⁴¹ CAP 2020 Endnote 31: U.S. Environmental Protection Agency, "Wetlands – Status and Trends," available at https://archive.epa.gov/water/archive/web/html/vital_status.html (last accessed August 2020); U.S. Environmental Protection Agency, "EPA Releases Report Showing Nearly Half of Nation's Wetlands in Good Health," Press release, May 11, 2016, available at <https://archive.epa.gov/epa/newsreleases/epa-releases-report-showing-nearly-half-nations-wetlands-good-health.html>

⁴² Princeton University, Net Zero America Project. <https://environmenthalfcentury.princeton.edu/>

⁴³ U.S. EIA. Electric Power Monthly, February 2021, preliminary data for 2020.

<https://www.eia.gov/energyexplained/electricity/electricity-in-the-us-generation-capacity-and-sales.php#:~:text=At%20the%20end%20of%202020,solar%20photovoltaic%20electricity%20generating%20capacity.>

⁴⁴ Sustainable Development Solutions Network (SDSN). 2020. Zero Carbon Action Plan. New York. p.33: <https://irp-cdn.multiscreensite.com/6f2c9f57/files/uploaded/zero-carbon-action-plan.pdf>

reduction credits or offsets. Supply-side actions, especially for DOI, largely involve increased permitting efficiency and prioritization. A smart from the start approach is crucial to ensuring responsible development on public lands that protects our natural and cultural heritage.⁴⁵

Onshore renewable energy

Less than 5% of the total U.S. solar, wind and geothermal capacity comes from projects on public lands.⁴⁶ As of 2019 there were 96 utility-scale renewable energy projects operating on public lands and these projects had a total generating capacity of 5,041 MW. TWS has assessed that expanding onshore federal renewables by 25 GW from the current 5GW to reach 30GW operating by 2030 is a reasonable goal for responsible federal onshore development. This goal is also consistent with the target included in the government spending bill approved by Congress in December 2020: to permit at least 25GW of onshore renewables on federal land by 2025 through management of public lands and administration of federal laws.⁴⁷ A far less ambitious goal would be to simply reach the 10GW permitting level that was set in 2005.⁴⁸

In this toolkit we assume the share of additional renewable generating capacity by technology type remains constant as the existing 5 GW as documented in a joint report released by TWS and Yale Center for Business and the Environment in May 2020.⁴⁹ The additional 25 GW is assumed to be 52% utility scale solar PV (13 GW), 22% wind (5.5 GW), and 26% geothermal (6.5 GW). We use EPA's AVERT tool to calculate estimated avoided emissions in 2030.⁵⁰ The estimate varies based on where the projects are located.

Offshore renewable energy

For offshore, we include emission reduction estimates from a relatively low goal of achieving 15 GW of offshore renewable generating capacity in federal public waters (meaning in the outer continental shelf (OCS)) by 2030 and a moderate goal of achieving 30 GW in federal public waters by 2030. According to BOEM, the OCS blocks leased as of July 2016 had the potential to support 14.6 GW of commercial wind generation if leases were developed as planned.⁵¹ The Biden Administration set a goal of deploying 30 GW of offshore wind by 2030.⁵²

⁴⁵ Springer N. Daue A. (2020) Key Economic Benefits of Renewable Energy on Public Lands. Yale Center for Business and the Environment and The Wilderness Society. <https://www.wilderness.org/renewableenergyreport>

⁴⁶ *Id.*

⁴⁷ Consolidated Appropriations Act, 2021. Sec. 3104. (b).

<https://rules.house.gov/sites/democrats.rules.house.gov/files/BILLS-116HR133SA-RCP-116-68.pdf>

⁴⁸ The Energy Policy Act of 2005 set a goal for DOI to permit 10 GW of renewables by 2010.

<https://www.congress.gov/109/plaws/publ58/PLAW-109publ58.pdf>

⁴⁹ Springer N. Daue A. (2020) Key Economic Benefits of Renewable Energy on Public Lands. Yale Center for Business and the Environment and The Wilderness Society. <https://www.wilderness.org/renewableenergyreport>

⁵⁰ US EPA. AVoided Emissions and geneRation Tool (AVERT).

<https://www.epa.gov/statelocalenergy/avoided-emissions-and-generation-tool-avert#when>

⁵¹ Bureau of Ocean Energy Management (BOEM) 5 year leasing program EIS 2017-2022: p. 1-12.

⁵² FACT SHEET: Biden Administration Jump Starts Offshore Wind Energy Projects to Create Jobs.

<https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-biden-administration-jumpstarts-offshore-wind-energy-projects-to-create-jobs/>

To calculate roughly what these offshore GW targets mean in terms of avoided emissions, we use the same ratio as the BOEM National Offshore Wind Strategy Report, 1 GW = 2.55 million metric tons of CO₂e avoided per year.⁵³

⁵³ BOEM (2016) National Offshore Wind Strategy Report. 2016.
<https://www.boem.gov/sites/default/files/renewable-energy-program/National-Offshore-Wind-Strategy-report-09082016.pdf>

From: [Feldgus, Steven H](#)
To: [Sanchez, Alexandra L](#); [Daniel-Davis, Laura E](#)
Subject: RE: Assessment of Undiscovered Technically Recoverable Oil and Gas Resources of the Nation's Outer Continental Shelf
Date: Friday, May 28, 2021 3:57:47 PM

Yeah, (b) (5)

-----Original Message-----

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, May 28, 2021 2:59 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: FW: Assessment of Undiscovered Technically Recoverable Oil and Gas Resources of the Nation's Outer Continental Shelf

(b) (5)

maybe?

-----Original Message-----

From: Lefton, Amanda B <Amanda.Lefton@boem.gov>
Sent: Wednesday, May 12, 2021 11:50 AM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Scott, Janea A <janea_scott@ios.doi.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: Assessment of Undiscovered Technically Recoverable Oil and Gas Resources of the Nation's Outer Continental Shelf

As discussed, attached please find the assessment of undiscovered technically recoverable oil and gas resources. For your convenience, I have also reattached the Notice to Stakeholders here. Our plan is to advance this on Friday.

A

From: [Knodel, Marissa S](#)
To: [Diera, Alexx A](#); [Jackson, Danna R](#); [Feldgus, Steven H](#); [Lefton, Amanda B](#); [Sanchez, Alexandra L](#); [Culver, Nada L](#); [Scott, Janea A](#); [Daniel-Davis, Laura E](#)
Subject: Updated summary of public feedback
Date: Thursday, May 27, 2021 11:16:46 AM
Attachments: [Interim Report of Feedback Suggestions 27 May 21.docx](#)

Hello all,

Please see an updated report of public feedback for the review, with fun graphics added! Alex, feel free to add one to the report if you like them.

Peace,

Marissa

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

Appendix C:
Interim Summary of Public Comments
from the
March 25, 2021 Forum

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Abbreviations and Acronyms

BLM	Bureau of Land Management
BOEM	Bureau of Ocean Energy Management
EPA	U.S. Environmental Protection Agency
GAO	U.S. Government Accountability Office
GHG	Greenhouse Gas
GOMESA	Gulf of Mexico Energy Security Act
FLPMA	Federal Land Policy and Management Act
LDAR	Leak Detection and Repair Systems
MLA	Mineral Leasing Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
OCS	Outer Continental Shelf
OCSLA	Outer Continental Shelf Lands Act
ONRR	Office of Natural Resources Revenue
PEIS	Programmatic environmental impact statement

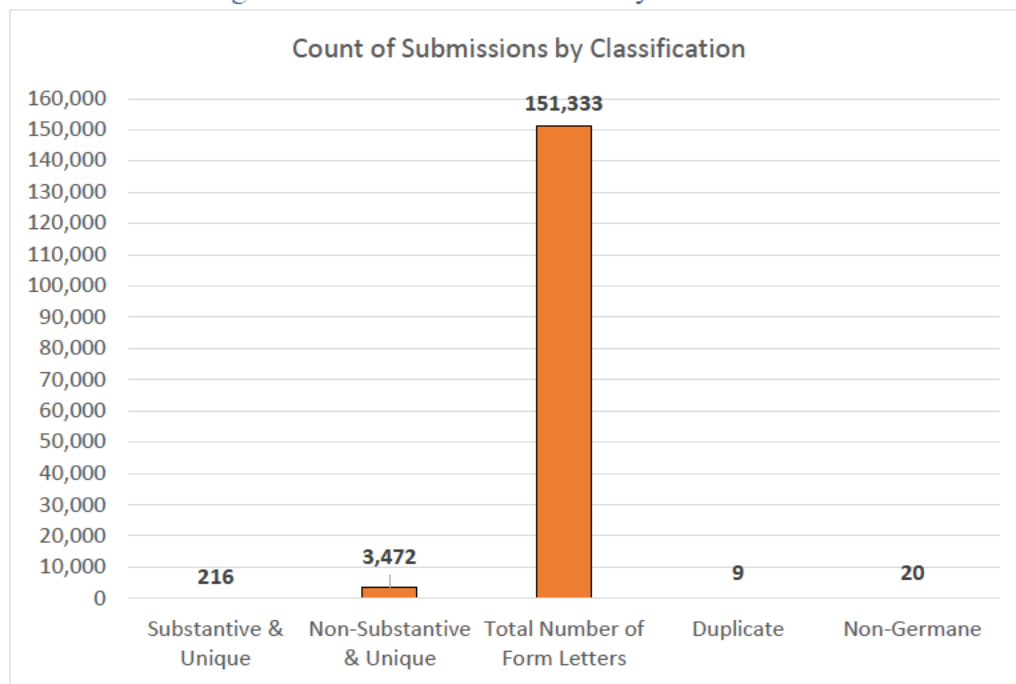
1. Introduction

On March 25, 2021, the Department of the Interior (“the Department”) hosted a virtual public forum as part of the Department’s comprehensive review of the federal oil and gas program, as called for in [Executive Order 14008](#). The forum featured several panels to highlight perspectives from invited participants, including industry representatives, unions, environmental justice organizations, natural resource advocates, Indigenous organizations, academics, and other experts.

To help inform the Department on next steps and outline recommendations for the Department and United States Congress to improve stewardship of public lands and waters, create jobs, and build a just and equitable energy future, a public comment period was opened from March 25, 2021 through April 15, 2021. Members of the public were asked to submit comments and additional information to inform the Department’s interim report at energyreview@ios.doi.gov.

Through April 15, 2021, 155,050 public comments were received, including individual comments, comments submitted as part of mass mail campaigns, petitions, and oral comments submitted during the virtual meeting. Of the comments received, 3,472 were identified as unique, 151,333 were part of 28 different mass mail campaigns and petitions and 29 comments were either duplicate or not germane. The Figure 1 below displays the count of all submissions received by classification.

Figure 1: Count of Submissions by Classification



The figures below display the types and counts of stakeholders who provided public comments. Although comments were received across these commenter types, today's interim report provides only a high-level summary of suggestions and recommendations provided by commenters. The summaries are organized by commenter type and then by issue topic.

Figure 2 displays the type of submissions (unique, form copies within emails and bundled campaigns) received within each commenter type

Figure 2: Type of Submissions by Commenter Type

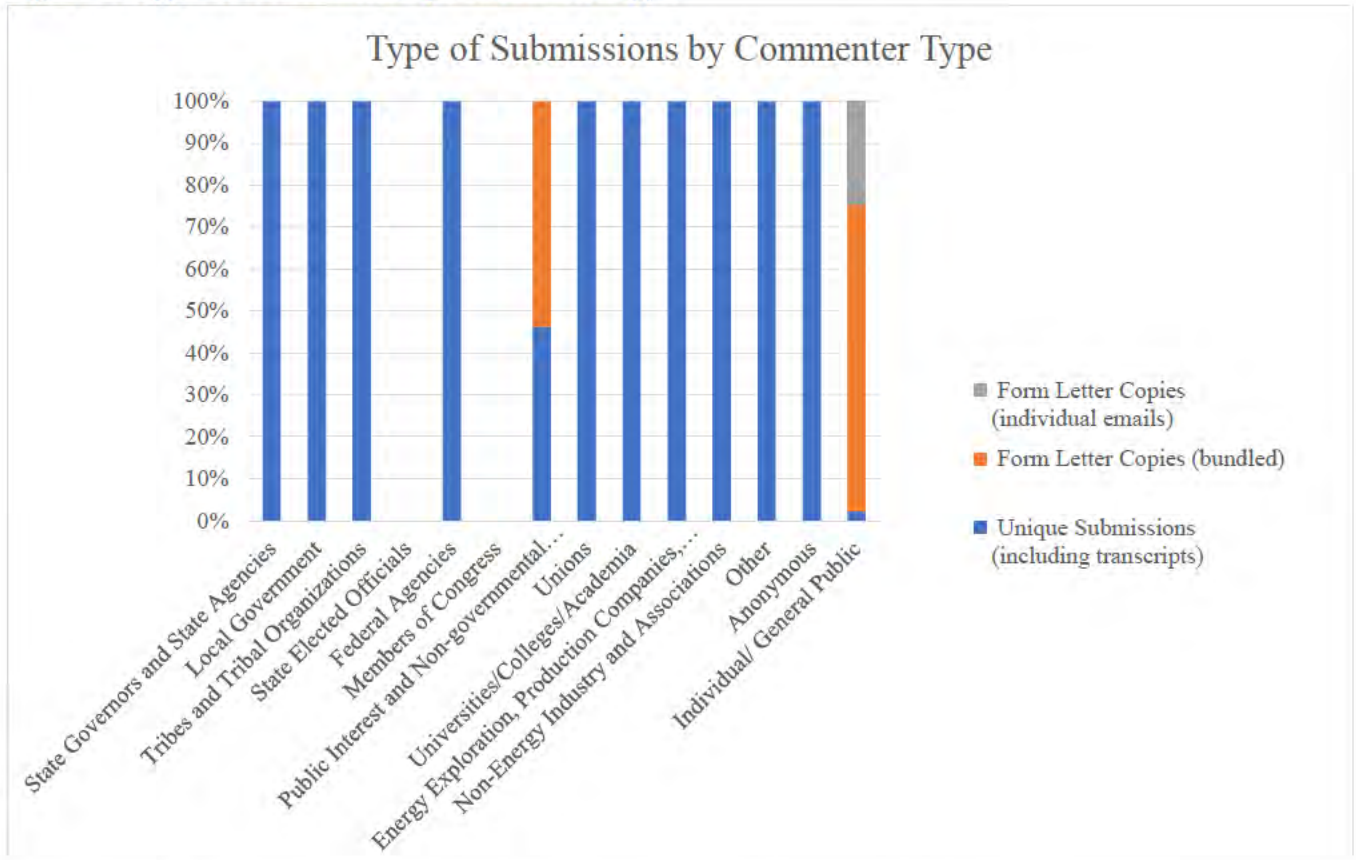


Figure 3 displays the distribution of unique submissions by commenter type.

Figure 3: Count of Unique Submissions by Commenter Type

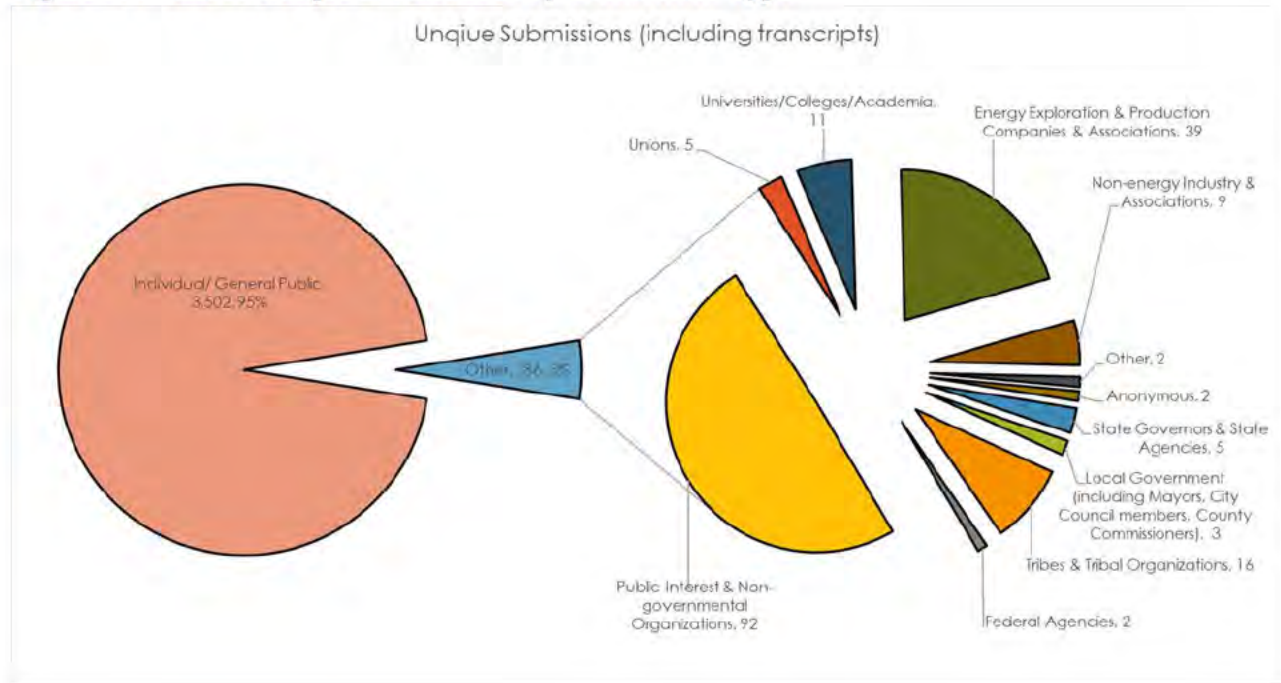
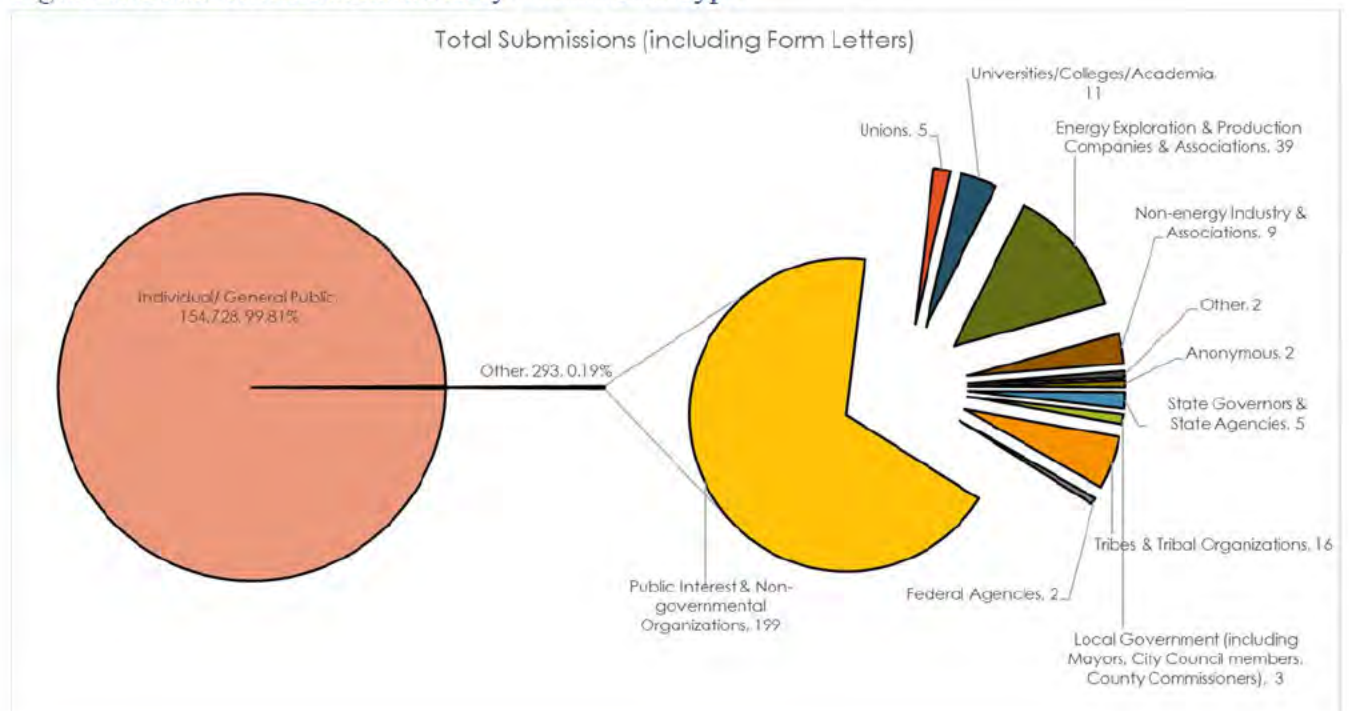


Figure 4 displays the distribution of all submissions by commenter type.

Figure 4: Count of All Submissions by Commenter Type



The public provided comments related to onshore and offshore activities. The table below displays the count of submissions which address either onshore, offshore, or both onshore and offshore activities.

Table 1: Counts of comments discussing onshore and offshore activities.

Activity type	Unique Submissions	Total Submissions (unique and form letter copies)
Onshore	71	13,438
Offshore	36	15,644
Both onshore and offshore	206	122,251

2. Comments from State Governments

2.1. Jobs/ Unions

- BOEM should work on building a path to economic recovery from the COVID-19 pandemic, including identifying ways to create jobs, provide relief for families and businesses, and replenish Gulf of Mexico Energy Security Act (GOMESA) funds.¹

2.2. Energy Needs/ Future Climate Scenarios/ Substitutions

- Foreign countries would supply oil to meet U.S. energy needs if the United States were to reduce its own production. While the transition to renewables is ongoing, the Outer Continental Shelf (OCS) could be a better, and greener, source of traditional energy compared to greater reliance on imported fuels and feedstocks, for which production and transportation could be much less environmentally responsible.²
- A financially stable, offshore traditional fuels industry would be important in helping States move toward renewables, including offshore wind energy. “The infrastructure and expertise needed to build out an offshore wind energy economy will depend heavily upon leveraging the overlapping resources (ports, roads, highly specialized vessels, skilled mariners and associated supply chains) and skill sets currently supported by the existing offshore oil and gas industry.”³

2.3. Other Impacts

- Prolonged administrative restrictions could severely impact funding sources, which are tied to oil and gas revenues due to the Great American Outdoors Act, for land and water conservation efforts and maintenance of Utah’s National Park System facilities.⁴

2.4. Additional Groups to Outreach/ Coordinate

- The Outer Continental Shelf Lands Act (OCSLA) requires consultation with State governors during the planning process. BOEM should consult with State governors to recognize their States’ unique views and needs regarding offshore energy development.⁵
- Local needs and desires should be factored into the Department’s oil and gas leasing program since local communities will be most directly affected by the associated socioeconomic and environmental impacts.⁶

¹ State of Alabama, Office of the Governor; State of Louisiana, Office of the Governor.

² State of Louisiana, Office of the Governor.

³ State of Louisiana, Office of the Governor.

⁴ State of Utah, Department of Agriculture and Food.

⁵ OCS Governors Coalition; State of Alabama, Office of the Governor.

⁶ State of Utah, Department of Agriculture and Food.

- The Department is required by the Federal Land Policy and Management Act (FLPMA) to make decisions that are consistent with, to the maximum extent possible, State and County Resource Management Plans. Additional meetings should be held to ensure that States, tribes, local governments, and other stakeholders have meaningful opportunities to engage with the Department. The Department’s outreach and coordination with stakeholders could promote collaboration, innovation, and fairness regarding oil and gas extraction on public lands and make Federal agencies aware of how Federal policy is going to affect local communities.⁷

3. Comments from Local Governments

3.1. Leasing Strategy

- Providing regular lease sales allows developers to efficiently explore and produce resources in a way that limits surface impacts. The opportunity to bid on Federal parcels regularly is important in the context of complex landownership patterns where the checkerboard and split States makes oil and gas leasing challenging.⁸

3.2. Additional Groups to Outreach/ Coordinate

- Counties almost always serve as cooperating agencies on revisions or amendments to the Bureau of Land Management’s (BLM) resource management plans, including planning and project-level analyses involving oil and gas development. An oil and gas moratorium unravels the work counties, and their constituents, dedicate to developing plans for Federal lands over decades in violation of Federal law and policy.⁹

4. Comments from Tribes and Tribal Organizations

4.1. Environmental Justice

- An “equitable share of Federal resources from Executive Order 14008” should be set aside for disadvantaged communities in Alaska.¹⁰

4.2. Tribal Consultation

- Standardize tribal consultation between different States, bureaus, districts, and regional offices involved in oil and gas leasing development.¹¹

⁷ State of Utah, Department of Agriculture and Food.

⁸ Wyoming County Commissioners Association.

⁹ Wyoming County Commissioners Association.

¹⁰ Alaska Federation of Natives; All Pueblo Council of Governors.

¹¹ Pueblo of Acoma.

- For the Greater Chaco Region, tribal consultation was insufficient.¹²
- Ensure that tribally led cultural resource studies are conducted prior to BLM’s decision about oil and gas leasing development.¹³
- Integrate the review processes required under the National Historic Preservation Act (NHPA) Section 106 and the National Environmental Policy Act (NEPA). Information gathered during the NHPA Section 106 review about cultural resources should be considered during the NEPA review. BLM should consult with tribes throughout both the NHPA and NEPA review processes.¹⁴
- Although a representative from the Alaska Federation of Natives participated in the public forum, the Department should consult representatives from Alaska’s North Slope communities.¹⁵
- Host specific “government-to-government consultation” with tribes regarding oil and gas development on public lands.¹⁶
- The Federal consultation process violates the United Nations Declaration on the Rights of Indigenous Peoples’ principle of free, prior, and informed consent.¹⁷
- BLM should recognize tribes’ right to regulate energy resources on tribal lands. Self-governance of tribal lands is also helpful in managing sacred cultural sites.¹⁸
- Clarity in communication with the Department, such as where to find the Dear Tribal Leader letters or how to use the Federal Register. Department representatives should visit Alaska to see the entirety of the land.¹⁹
- Expedited timeframes prevent meaningful tribal participation.²⁰

4.3. Jobs/ Unions

- Oil and gas leasing has a positive economic impact, including a ripple-effect to other industries.²¹

4.4. Revenues

- Oil and gas leasing increases State and local government revenues. The revenues allow the local governments to invest in infrastructure, utilities, and other public services.²²

¹² Pueblo of Acoma; All Pueblo Council of Governors.

¹³ Pueblo of Acoma; Santa Clara Pueblo; All Pueblo Council of Governors.

¹⁴ Pueblo of Acoma; Santa Clara Pueblo; All Pueblo Council of Governors.

¹⁵ Arctic Slope Regional Corporation.

¹⁶ Santa Clara Pueblo.

¹⁷ All Pueblo Council of Governors; National Congress of American Indians.

¹⁸ National Congress of American Indians.

¹⁹ Alaska Federation of Natives.

²⁰ All Pueblo Council of Governors.

²¹ Arctic Slope Regional Corporation.

²² Arctic Slope Regional Corporation.

4.5. Leasing Strategy

- Pause lease sales and development until completion of the Greater Chaco Region Resource Management Plan Amendment. Withdraw development from ten miles of critical area surrounding the Chaco Culture National Historical Park.²³
- Withdraw development from tribes’ critical areas.²⁴
- Withdraw Secretarial Order 3355, which was used by BLM to justify expediting decision making for the oil and gas program, and Secretarial Order 3389, which required NHPA Section 106 process to also proceed on an expedited timeline.²⁵
- Remove “imposed and rigid timeframes” so that internal guidance will be more consistent with Executive Order 13990.²⁶

4.6. Fiscal Terms/ Fair Market Value/ Royalties/ Bonding

- Native Alaskan communities on the North Slope benefit from the royalties of oil and gas development, as provided by the Naval Petroleum Reserves Production Act, which supports public infrastructure and social services.²⁷

5. Comments from Universities

5.1. Technologies or strategies to reduce emissions on facilities or through other means

- Take a multi-step legal approach to restoring regulations on methane emissions and flaring, including:

Flaring:²⁸

- Join the appeal of the “Wyoming case” that vacated the 2016 Waste Prevention Rule (“the 2016 Rule).
- Reverse the Trump Administration’s appeal of the California ruling that vacated the Rescission of the 2016 Rule.
- Once the appeals process for the Wyoming case is completed, initiate a new rulemaking process to strengthen the 2016 Rule.

²³ Pueblo of Acoma; Santa Clara Pueblo; All Pueblo Council of Governors.

²⁴ Santa Clara Pueblo; All Pueblo Council of Governors.

²⁵ Santa Clara Pueblo.

²⁶ All Pueblo Council of Governors.

²⁷ Arctic Slope Regional Corporation.

²⁸ Columbia University Center on Global Energy Policy.

- Since there are many marginal wells and small operators, at a minimum, routine flaring should be banned for all producers regardless of size. The policy should be phased in over multiple years.
- Equipment standards should be provided for flares, while still allowing innovative technology that improves performance. Recommended standards include:
 - Efficiency standard for flares;
 - Required reporting of the content of emissions from flares;
 - Requirement that flares be lit; and
 - Required detection of unlit flares along with a device that automatically reignites them.

Leak Detection:²⁹

- “Organize a third-party subscription-based regional methane emissions leak detection system on Federal land that includes all the operators and wells within a region to take advantage of the best available technology and take advantage of scale and lower costs. These regional leak detection and repair (LDAR) systems should be managed and staffed by a third party.”
- “A leak detection system could include satellites, ground sensors, drones, helicopters or airplanes.”
- “Cost-sharing in proportion to production would help defray the cost of modern [LDAR] for small operators and marginal wells.”
- “Those who join the service would have the advantage of third-party certification of their emissions levels. If operators refuse to join, their emissions data would still be captured and published by this system, but they will also need to comply with the 2016 Rule’s LDAR requirements on their own and explain significant differences with the subscription system data.”

Emissions Reporting:³⁰

- Encourage the use of innovative technology to make emissions reporting simpler for the operators and more timely and more transparent for BLM and the public.
- Encourage the use of innovative technology such as sensors and satellites.
- The regional LDAR should be the primary way to confirm companies comply with methane emissions rules.
- Publish the emissions data collected from both company-reported data and from regionally-collected emissions subscription-service data in an easy-to-use format, making the data more transparent to the Department, the companies, and the public. Companies would need to explain substantial differences between reported and third party collected regional emissions data.

²⁹ Columbia University Center on Global Energy Policy.

³⁰ Columbia University Center on Global Energy Policy.

- Companies should be required to report emissions from flaring, venting and methane leaks separately. Today, some State regulations do not distinguish between venting and flaring (e.g., Texas).
 - Establish a portal for all emissions reporting agencies for electronic reporting. A central coordinator should work to reduce overlap and make sure the best technology is used to measure emissions.
- Under the provisions on “Pneumatic Controllers and Pumps” of the 2016 Waste Prevention Rule, assess what can be done about intermediate bleed controllers because they are responsible for 88 percent of the emissions from pneumatic controllers.³¹

5.2. Environmental Justice

- Environmental justice benefits should be included in any cost-benefit analysis. Analyze the impact of the existing emissions or flaring and new rules on low-income groups and native communities.³²

5.3. Leasing Strategy

- Increase the rate of tract development by shortening primary terms for onshore oil and gas leases to no more than five years. This will require an act of Congress to amend the Mineral Leasing Act of 1920 (MLA).³³
- Increase the minimum bid per acre to be more aligned with the policies adopted by State agencies. This can be implemented by BLM via the administrative rulemaking process.³⁴
- Terminate the non-competitive leasing program. Eliminating the non-competitive leasing program will require a statutory amendment to the MLA.³⁵
- To better fulfill its statutory multiple-use and sustained yield mission, the Department can adopt leasing policies that are like those of major oil producing States, such as Louisiana, New Mexico, North Dakota, and Texas.³⁶
- Through rulemaking, substantially increase bond amounts to where firms credibly cover the proper wells’ plugging and abandonment at the end of their useful life. This approach will also protect taxpayers from paying decommissioning costs and protect public health from the hazards imposed by abandoned wells.³⁷

³¹ Columbia University Center on Global Energy Policy.

³² Columbia University Center on Global Energy Policy.

³³ Energy Policy Institute at the University of Chicago.

³⁴ Energy Policy Institute at the University of Chicago.

³⁵ Energy Policy Institute at the University of Chicago.

³⁶ Energy Policy Institute at the University of Chicago.

³⁷ Energy Policy Institute at the University of Chicago.

5.4. Fiscal Terms/ Fair Market Value/ Royalties/ Bonding

- To ensure that BLM meets its statutory responsibilities and better align Federal onshore oil and gas leasing policy with those used by State agencies, BLM could raise the Federal royalty rate to substantially increase taxpayers' returns, reduce the standard lease term to speed the rate at which resources are developed, and increase Federal bonding requirements.³⁸
- To address issues related to mineral leases that transact below market value or do not transact at all, and firms that sit on marginal tracts for a decade and preclude the land use by others and impose administrative costs, BLM should:
 1. Shorten primary terms for onshore oil and gas leases to no more than five years, aligned with the policies adopted by State agencies and leases observed in private markets;
 2. Increase the minimum bid per acre to be more aligned with the policies adopted by State agencies; and
 3. Terminate the non-competitive leasing program.³⁹
- The minimum bid offered should increase from \$2 per acre to \$100 per acre.⁴⁰

Royalties:

- BLM can increase the share of Federal oil and gas resources that leads to revenue for taxpayers rather than profits for oil and gas firms by setting higher royalty rates, eliminating royalty deductions, and increasing the minimum bid in its lease auctions. The negative impacts of a higher royalty rate on development and production can be mitigated by shortening the lease term from ten years to five years and by eliminating the BLM's non-competitive leasing process, though these changes require statutory amendments.⁴¹
- Increase the Federal onshore royalty rate. The statutory minimum royalty rate is 12.5 percent of oil and gas leases. This royalty rate falls below that used in major oil producing States for leases on State-owned land.⁴²
- An increase of royalty rates on new leases should be considered if leasing on Federal lands resumes after the 60-day moratorium. The current 12.5 percent royalty rate has not changed for 100 years and higher rates can be observed on private and many States' lands.⁴³
- A 20 percent royalty rate on Federal lands can be justified. A modest decline in leasing would be made up in terms of revenue.⁴⁴
- "To determine how much the royalty rate can increase without shutting off a large portion of new production, BLM should assess the competitiveness of Federal leases. Any

³⁸ Energy Policy Institute at the University of Chicago.

³⁹ Energy Policy Institute at the University of Chicago.

⁴⁰ Natural Resources Law Center at University of Colorado Law School.

⁴¹ Energy Policy Institute at the University of Chicago.

⁴² Energy Policy Institute at the University of Chicago.

⁴³ Columbia University Center on Global Energy Policy.

⁴⁴ Natural Resources Law Center at University of Colorado Law School.

economic impacts could be partially offset by ensuring there were sufficient BLM personnel to avoid major delays in permitting.⁴⁵

- Simplify royalty valuation by eliminating deductions. Office of Natural Resources Revenue (ONRR) could use a liquidly traded, transparent price index, such as West Texas Intermediate or Brent for oil or Henry Hub for natural gas, as the benchmark for all produced oil and gas. With this approach, daily prices can be independently verified by third parties and the markets would be difficult to manipulate.⁴⁶
- ONRR could eliminate deductions for transportation costs, price differentials, or product quality. Potential drilling partners may bid less in certain mineral lease auctions, but the winners of those auctions will end up paying more in royalties.”⁴⁷

Bonds:

- Strengthen bonding requirements to protect the environment and public health. BLM can increase its bond requirement by administrative rulemaking, without requiring new statutory authority.⁴⁸
- As recommended in a 2019 Government Accountability Office (GAO) report, BLM should increase its bonding amounts.⁴⁹
- The value of bonds on new leases should be increased to adequately cover the cleanup costs of abandoned wells.⁵⁰ The 2019 GAO report indicated that operators’ up-front bonds were too small to fully cover clean-up costs, leading taxpayers with the cost to manage orphaned wells.⁵¹

Rental Fees:

- Increase rental fees to \$10 per acre. Although this may result in less leasing, revenues are not expected to decrease. Distinguishing between competitive and noncompetitive leases is not needed if a sufficient fee is charged. Alternatively, an escalating rental fee (e.g., \$10 for the first three years), would discourage companies from holding leases that they are not likely to develop.⁵²

5.5. Energy Needs/ Future Climate Scenarios/ Substitutions

- The Department should think strategically about how to manage the decline of oil and gas industry as actions are taken to thwart climate change will impact oil and gas prices.⁵³

⁴⁵ Columbia University Center on Global Energy Policy.

⁴⁶ Energy Policy Institute at the University of Chicago.

⁴⁷ Energy Policy Institute at the University of Chicago.

⁴⁸ Energy Policy Institute at the University of Chicago.

⁴⁹ Natural Resources Law Center at University of Colorado Law School.

⁵⁰ Columbia University Center on Global Energy Policy; Energy Policy Institute at the University of Chicago.

⁵¹ Energy Policy Institute at the University of Chicago.

⁵² Natural Resources Law Center at University of Colorado Law School.

⁵³ Natural Resources Law Center at University of Colorado Law School.

5.6. Orphan Wells/ Remediation

- Offshore wells should also be included in the program. More research is needed on how much methane leakage there may be from idle offshore wells in the Gulf of Mexico.⁵⁴
- Plugging of abandoned oil and gas wells on Federal lands should be funded by Congress, which could be justified as a jobs program in addition to reducing methane leaks.⁵⁵
- The Department should work with Congress, the U.S. Environmental Protection Agency (EPA), other agencies, and industry to adopt an oil and gas leasing program plan like the Abandoned Mine Lands program under the Surface Mining Act, where there is a fee imposed on coal. A one penny tax charged on every barrel of oil produced would generate about \$80 million per year. Similarly, a tax of 5 cents would generate \$400 million per year.⁵⁶

5.7. Regulatory Changes

- Improve legal defensibility of the Waste Prevention Rule. “Depending on the outcome of the appeal of the Wyoming case on the 2016 Rule, BLM may need to develop evidence that shows that the rule is a necessary and appropriate means of preventing waste. A clearer reference may be needed in the new rule to provide BLM authority to protect the environment on Federal lands under the FLPMA.”⁵⁷

5.8. Other Impacts

- BOEM is encouraged to build a stronger relationship with regional ocean partnerships and similar entities that can help chart and support a plan that is equitable, efficient, and sustainable as it addresses climate change and the shared management of environmental and natural resources. BOEM should invest, at a greater rate, in understanding the complex and integrated nature of coastal communities and natural resources through environmental studies programs.⁵⁸

5.9. Additional Groups to Outreach/ Coordinate

- BOEM should engage with regional ocean partnerships at the beginning of development of new rules to keep communications open with a range of stakeholders and improve management.⁵⁹

⁵⁴ Columbia University Center on Global Energy Policy.

⁵⁵ Columbia University Center on Global Energy Policy.

⁵⁶ Natural Resources Law Center at University of Colorado Law School.

⁵⁷ Columbia University Center on Global Energy Policy.

⁵⁸ Harte Research Institute for Gulf of Mexico Studies at Texas A&M University.

⁵⁹ Natural Resources Law Center at University of Colorado Law School.

6. Comments from Non-Energy Industry

6.1. Social Cost of Carbon/Green House Gas (GHG)

- Permanently end new leasing for offshore drilling and invest in clean renewable offshore energy to advance ambitious and durable climate action that protects coastal economies, creates jobs, and benefits everyone.⁶⁰
- BLM should develop appropriate methodologies to calculate greenhouse gas (GHG) emissions associated with the entire fuel cycle for Federally leased oil and gas, including extraction, processing, transportation, refining, and combustion.⁶¹
- The Department should work to quantitatively monetize the impacts of GHG emissions associated with leased oil and gas using the EPA’s social cost of methane and the Interagency Working Group’s social cost of carbon methodologies, as well as the USGS carbon database. Explore alternatives to mitigate those impacts and ensure that leased oil and gas does not stand as an obstacle to GHG emission reduction goals. In coordination with other appropriate agencies, the Department should determine how much of U.S. GHG emissions should be permitted to come from Federal oil and gas leasing.⁶²
- Once a “Carbon Budget” is developed, BLM should take account of existing leases and then allocate any remaining budget to new leasing based on a revised leasing framework.⁶³
- BLM should consider incorporating the life-cycle costs of GHG emissions into the royalty rates charged for access to Federally leased oil and gas. BLM should also consider the relevant alternatives associated with where the money raised by such fees should be allocated, including payment for carbon mitigation or other efforts to reduce GHG emissions elsewhere; assisting oil and gas employees displaced by reductions in Federal oil and gas leasing or assisting States with lost revenue; or supporting oil and gas reclamation projects in areas where operators have not fulfilled their reclamation obligations.⁶⁴

6.2. Other Environmental Considerations

- It is imperative that, as soon as practicable, the Department completes the Programmatic Environmental Impact Statement (PEIS) and moves forward with revising its regulations necessary to carry out the decisions made by the NEPA process. Any proposed regulatory or other reforms should require notice and comment be issued concurrently with the Final PEIS.⁶⁵

⁶⁰ Business Alliance for Protecting the Pacific Coast.

⁶¹ Powder River Basin Resource Council.

⁶² Powder River Basin Resource Council.

⁶³ Powder River Basin Resource Council.

⁶⁴ Powder River Basin Resource Council.

⁶⁵ Powder River Basin Resource Council.

6.3. Revenue

- Consider developing new operating standards that promote real-time, continuous independent monitoring. Economic benefits of new standards including:
 1. Ensuring that natural gas remains in the pipe, allowing more revenues will flow to Federal, State, and local entities;
 2. Allowing the Federal government to lead production of the cleanest energy products available in the U.S. and set the stage for a market in differentiated natural gas products; and
 3. The cleaner products command a higher price in the marketplace, leading to higher royalty payments.⁶⁶

6.4. Leasing Strategy

- Update policies like those below as they indirectly subsidize oil and gas development at the expense of the American taxpayer:⁶⁷
 - Lease suspensions: inappropriate use of lease suspensions and unitization allows industry to hold leases indefinitely without production.
 - Lease reinstatements: current agency guidance does not provide clear direction for staff to evaluate and approve or deny reinstatements to ensure consistency with the MLA and agency regulations.
 - Leasing low potential lands: outdated planning guidance leads BLM to make most Federal minerals available to leasing in land use plans, regardless of the likelihood of development and in conflict with multiple use management and fiscal responsibility.
 - Leasing all oil and gas resources under a surface parcel: unlike private landowners, Department leases all oil and gas resources under a surface parcel, rather than leasing a specific formation slated for development.

6.5. Fiscal Terms/ Fair Market Value/ Royalties/ Bonding

- Require reclamation bonds that adequately cover plugging and reclamation costs of wells. Like wells bonded under the underground injection control program of the Safe Drinking Water Act, bonds should be site-specific, full-cost bonds, or \$13 per foot.⁶⁸
- Update definitions and mechanisms to properly track and review bond adequacy and well status. BLM should seek consistency with States like Wyoming to better track idle and orphan wells.⁶⁹

⁶⁶ Project Canary.

⁶⁷ Powder River Basin Resource Council.

⁶⁸ Powder River Basin Resource Council.

⁶⁹ Powder River Basin Resource Council.

- BLM has a duty to update its revenue-generating policies, including more accurately compensate the American taxpayer for the value and cost of the oil and gas resources being leased.⁷⁰
- BLM should increase Federal onshore royalty rates because they are lower than the rates used by every major western oil and gas producing State and commonly charged by private mineral owners. BLM should consider other mechanisms to enhance financial return, including net profit sharing or royalty bidding.⁷¹

6.6. Permitting/ Exploration, Development, and Drilling Plans

- New operating standards for natural gas development on public lands should contain the following concepts:

Real-time, Continuous Monitoring of Emissions:

- Hold operators to account for any leaks by requiring real-time, continuous monitoring of emissions at the wellhead/production pad.
- Utilize existing technology to monitor the carbon and methane intensity of production.
- Require real-time access to, and sharing of, data with Federal and State agencies by independent third parties to ensure the veracity of data.

Operational Elements:

- Engineering controls – require the highest level of standards for well development, including casing and cement, monitoring, and maintenance.
- Well control excellence (drilling and completions) – require well operators to display well control competency and emergency response capability, ensuring that a well control incident during both drilling and completions operations can be addressed in a timely fashion.
- Operational impacts – ensure that development plans mitigate environmental and community disturbance through proper engineering controls and communication channels, including biodiversity considerations, channels for public input, and noise/dust/light mitigation.
- Emergency response – ensure that an operator must show demonstrable engagement in emergency response by providing training program requirements and emergency response plan, or equivalent, that outlines various stakeholders and their respective responsibilities.
- Spill mitigation and response – utilize the highest industry standards in spill mitigation and response through appropriate risk mitigation and availability of relevant spill response equipment by operators.
- Water stewardship – focus on responsible water stewardship using recycled water and the completion of periodic water impact analysis.

⁷⁰ Powder River Basin Resource Council.

⁷¹ Powder River Basin Resource Council.

- Reclamation and abandonment – demonstrate the capability to, or have a plan, to successfully reclaim affected surface areas and commit to plug and abandonment operations.⁷²
- Require phased development of oil and gas resources and prioritize phased development as an option to better address the on-the-ground impacts of Federal oil and gas development.⁷³

6.7. Regulatory Changes

- Restore the multiple use mission of the BLM and ensure that air, water, land, and wildlife resources are prioritized and protected. This is needed on both Federal surface land, managed by the BLM or other Federal land managing agencies, and on split State lands where Federal oil and gas resources are developed.⁷⁴
- Revise and update that Federal oil and gas leasing and development framework in a manner that will minimize the extent to which Federal oil and gas contributes to the emissions that drive climate change; ameliorate direct impacts to the environment where Federal oil and gas is developed; and maximize the value of this Federal resource.⁷⁵
- Explore alternatives that will achieve the following overarching objectives:⁷⁶
 - Delineating the full scope of GHG emissions associated with Federal oil and gas leasing and development, including upstream, midstream, and downstream emissions; and then reducing, mitigating, or eliminating these emissions to align with the Nation’s priorities and actions to address climate change;
 - Identifying and fully presenting a detailed analysis of the direct adverse environmental impacts associated with Federal oil and gas leasing and development and developing new regulations and policies to ensure these impacts are minimized, including insuring proper reclamation; and
 - Reforming the oil and gas leasing price structure to advance GHG emission reduction objectives, ensure meaningful competition, and provide a transparent and fair return to taxpayers.
- During its review, BLM should provide a complete environmental analysis of, potential alternatives to, and mitigation measures associated with, Federal oil and gas leasing and developments. BLM should have an informed basis for restructuring the regulatory and policy framework for Federal oil and gas leasing and development. Objectives should include minimizing contributions to GHG emissions and other environmental harms, while maximizing returns to the American public.⁷⁷

⁷² Project Canary.

⁷³ Powder River Basin Resource Council.

⁷⁴ Powder River Basin Resource Council.

⁷⁵ Powder River Basin Resource Council.

⁷⁶ Powder River Basin Resource Council.

⁷⁷ Powder River Basin Resource Council.

6.8. Other Impacts

- Adopt broad, uniform, performance-based standards that ensure all Federal wells drilled meet acceptable minimum requirements for reclamation. Consider establishing, “unsuitability-for-leasing criteria focused on insuring that remediation can be adequately completed, and additional design criteria to ensure that lease tract and APD design best align with remediation objectives.”⁷⁸
- Consider new ways to better enforce and require compliance with existing and new regulatory standards.⁷⁹
- Adopt a “bad operator” standard that would preclude any new leases or permits to any company that is out-of-compliance with FLPMA, MLA, Clean Water Act, Clean Air Act, or any other environmental requirements at any well they operate.⁸⁰
- Prioritize public health and safety protection through coordination with the EPA to update air quality standards, improve air quality modeling and monitoring, and minimize venting and flaring at Federal oil and gas wells.⁸¹
- Consistently enforce compliance with the quarter-mile setback from homes contained within Lease Notice #1, including clarifying that this Federal setback overrules any smaller State setback requirements.⁸²

6.9. Additional Groups to Outreach/ Coordinate

- Engage with coastal businesses during the comprehensive review. Coastal businesses are linked to ocean and beach health and understand that a robust and productive coastal economy is dependent on a healthy environment.⁸³
- Engage and consult landowners in all stages of development through lease notices, consent of leasing, onsite inspections, and analyses to determine well and infrastructure placement and reclamation.⁸⁴

7. Comments from Public Interest and Non-Governmental Organizations

7.1. Environmental Justice

- Consider environmental justice and equity when reviewing the program.⁸⁵

⁷⁸ Powder River Basin Resource Council.

⁷⁹ Powder River Basin Resource Council.

⁸⁰ Powder River Basin Resource Council.

⁸¹ Powder River Basin Resource Council.

⁸² Powder River Basin Resource Council.

⁸³ Business Alliance for Protecting the Pacific Coast.

⁸⁴ Powder River Basin Resource Council.

⁸⁵ Western Leaders Network.

7.2. Other Environmental Considerations

- Increase transparency in the environmental review process.⁸⁶

7.3. Leasing Strategy

- Mandate for the oil and gas leasing program that “leasing is not mandatory and should only be allowed if and when consistent with the multiple-use principle.”⁸⁷

7.4. Fiscal Terms/ Fair Market Value/ Royalties/ Bonding

- Adjust royalty rates to account for environmental harms caused by oil and gas development.⁸⁸
- End the practice of royalty relief.⁸⁹

7.5. Decommissioning

- Close loopholes that “place the burden of reclamation costs on taxpayers and private landowners.”⁹⁰

7.6. Energy Needs/ Future Climate Scenarios/ Substitutions

- BOEM should support the transition to renewable energy, specifically offshore wind. Nineteen of the 29 States with offshore wind potential could produce more electricity from the offshore wind than total electricity used by those States in 2019.⁹¹

7.7. Legislative Recommendations

- Congress should adopt legislation that would protect Nevada’s Ruby Mountains and other public lands, such as Senator Cortez Masto’s “End Speculative Oil and Gas Leasing Act,” which would end certain leasing practices and establish protections for public lands.⁹²

⁸⁶ U.S. PIRG and Environment America.

⁸⁷ Western Leaders Network.

⁸⁸ U.S. PIRG and Environment America; Nevada Conservation League; Western Leaders Network.

⁸⁹ U.S. PIRG and Environment America.

⁹⁰ Western Leaders Network.

⁹¹ U.S. PIRG and Environment America.

⁹² Nevada Conservation League.

8. Other Commenters

8.1. Other Impacts

- Promulgate rules to protect air quality and prepare a PEIS pursuant to NEPA with a “strategic targeted focus on data collection, assessment, and review specific to the cumulative impacts in the Central Gulf of Mexico OCS region.”⁹³

⁹³ Operation Homecare.

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008
Date: Thursday, May 27, 2021 10:58:15 AM

I'm so grateful! For me, as soon as we get the interim report done, I'd like to set a meeting with them to talk about these recommendations, especially the regulations. Let's include that in the note or I can pile on?

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, May 27, 2021 8:37 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: Re: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

Will do!

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, May 27, 2021 8:28:58 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

If you don't mind, (b) (5) – just smushed it up a bit.

Nada Wolff Culver
Deputy Director, Policy and Programs
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Cell: 202-255-6979
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From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, May 27, 2021 8:21 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: Re: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

Laura said we should send back to FS (b) (5)

(b) (5) . Would you like me to?

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, May 27, 2021 6:10:53 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: Re: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

Sounds good. I'm going to bring this up to Laura's attention this morning. And the new coal info. Thank you Nada!!

From: Culver, Nada L <nculver@blm.gov>
Sent: Thursday, May 27, 2021 12:35:50 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

I thought it was good too. (b) (5)

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Wednesday, May 26, 2021 11:47 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: FW: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

I think this slipped – (b) (5)

What do you think?

Alex

From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Friday, May 21, 2021 2:20 PM
To: Culver, Nada L <nculver@blm.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Daniel-Davis, Laura E <

davis@ios.doi.gov>

Subject: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

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Nada, Alex, and Laura,

(b) (5) [REDACTED]
[REDACTED]
[REDACTED]. Please reach out with questions.

Christine Dawe, Acting Chief of Staff
Office of the Under Secretary
Natural Resources and Environment
United States Department of Agriculture (USDA)
406-370-8865
christine.dawe@usda.gov

From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, May 18, 2021 10:48 AM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

Hi Christine and Team Forest Service – Attached are some excerpts from the current draft of the interim report. (b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Thanks again for your interest in this. I've included Alex Sanchez, the holder of the report, here, too. She and I are happy to answer questions, as well.

We appreciate you holding this close, since it is still in draft and review.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, May 7, 2021 12:39 PM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: [EXTERNAL] RE: circling back - o&g report/EO 14008

Thanks Christine! On our to-do list to send you something to look at! We've had a couple internal meetings that led to some additional tinkering. We will get something over to you soon.

Laura

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From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Friday, May 7, 2021 2:36:36 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] RE: circling back - o&g report/EO 14008

Hi Laura, Just checking to see if I missed an email this week, or if you are still working on the draft report. No rush, I just didn't want to miss a deadline. Thanks

Christine Dawe, Acting Chief of Staff

Office of the Under Secretary
Natural Resources and Environment
United States Department of Agriculture (USDA)
1400 Independence Avenue, SW
Washington, DC 20250-0108
406-370-8865
christine.dawe@usda.gov

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, April 30, 2021 1:02 PM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: [EXTERNAL] RE: circling back - o&g report/EO 14008

Great - we will send you something to look at early next week. Thank you,
Laura

From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Friday, April 30, 2021 2:12 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: [EXTERNAL] RE: circling back - o&g report/EO 14008

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(b) (5)

Christine Dawe, Acting Chief of Staff

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Washington, DC 20250-0108
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christine.dawe@usda.gov

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, April 30, 2021 11:56 AM
To: Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; Dawe, Christine -FS <christine.dawe@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Subject: circling back - o&g report/EO 14008

Hi there,

Wanted to check in (b) (5)

[Redacted]

Thanks,

Laura and Nada

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: slide 13 help
Date: Thursday, May 27, 2021 7:24:15 AM
Attachments: [Presentation Interim Report FINAL .pptx](#)

I tried but failed to cut and paste the (b) (5) disclaimer on new slide 13 in the final presentation, attached. Sorry to bother you again with something so silly, help!

From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008
Date: Wednesday, May 26, 2021 1:56:57 PM

Ah right, the FS! It all looks fine to me - question is, (b) (5)

Let's see what Nada says.

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Wednesday, May 26, 2021 1:54 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: FW: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

Will let you know what Nada recommends! Sorry this one slipped.

From: Sanchez, Alexandra L
Sent: Wednesday, May 26, 2021 11:47 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: FW: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

I think this slipped – (b) (5)

What do you think?

Alex

From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Friday, May 21, 2021 2:20 PM
To: Culver, Nada L <nculver@blm.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

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Nada, Alex, and Laura,

(b) (5)

Please reach out

with questions.

Christine Dawe, Acting Chief of Staff

Office of the Under Secretary
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United States Department of Agriculture (USDA)
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christine.dawe@usda.gov

From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, May 18, 2021 10:48 AM
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Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

Hi Christine and Team Forest Service – Attached are some excerpts from the current draft of the interim report. (b) (5)

[Redacted content]

Thanks again for your interest in this. I've included Alex Sanchez, the holder of the report, here, too. She and I are happy to answer questions, as well.

We appreciate you holding this close, since it is still in draft and review.

Nada Wolff Culver
Deputy Director, Policy and Programs
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Cell: 202-255-6979
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From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, May 7, 2021 12:39 PM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: [EXTERNAL] RE: circling back - o&g report/EO 14008

Thanks Christine! On our to-do list to send you something to look at! We've had a couple internal meetings that led to some additional tinkering. We will get something over to you soon.

Laura

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From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Friday, May 7, 2021 2:36:36 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] RE: circling back - o&g report/EO 14008

Hi Laura, Just checking to see if I missed an email this week, or if you are still working on the draft report. No rush, I just didn't want to miss a deadline. Thanks

Christine Dawe, Acting Chief of Staff

Office of the Under Secretary
Natural Resources and Environment
United States Department of Agriculture (USDA)
1400 Independence Avenue, SW
Washington, DC 20250-0108
406-370-8865
christine.dawe@usda.gov

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, April 30, 2021 1:02 PM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: [EXTERNAL] RE: circling back - o&g report/EO 14008

Great - we will send you something to look at early next week. Thank you,
Laura

From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Friday, April 30, 2021 2:12 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Subject: [EXTERNAL] RE: circling back - o&g report/EO 14008

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(b) (5)

Christine Dawe, Acting Chief of Staff
Office of the Under Secretary
Natural Resources and Environment
United States Department of Agriculture (USDA)
1400 Independence Avenue, SW
Washington, DC 20250-0108
406-370-8865
christine.dawe@usda.gov

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, April 30, 2021 11:56 AM
To: Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; Dawe, Christine -FS <christine.dawe@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: circling back - o&g report/EO 14008

Hi there,
Wanted to check in (b) (5)

Thanks,
Laura and Nada

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From: [Culver, Nada L](#)
To: [Wallace, Andrew G](#); [Daniel-Davis, Laura E](#); [Sanchez, Alexandra L](#)
Subject: RE: Sen. Cortez Masto input on oil and gas report
Date: Tuesday, May 25, 2021 11:23:15 AM

Thanks, Drew. I'd sure be interesting in where they are getting their information. The topic is being addressed in the report, of course.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Tuesday, May 25, 2021 9:05 AM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>
Subject: Sen. Cortez Masto input on oil and gas report

Got this note from Sen. Cortez Masto office, sharing as FYI

Low-Potential Oil and Gas Leasing: I'm hearing the forthcoming O&G report may not have a strong focus on LPL. I think it's safe to say that my boss expects the report to have a very strong focus on LPL, and we hope these rumors are not indicative of the final product.

Andrew G. Wallace
Director of the Office of Congressional and Legislative Affairs
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240
andrew_wallace@ios.doi.gov

From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#); [Feldgus, Steven H](#); [Scott, Janea A](#); [Culver, Nada L](#); [Jackson, Danna R](#); [Diera, Alexx A](#); [Lefton, Amanda B](#); [Knodel, Marissa S](#)
Subject: Re: Daniel-Davis, Laura E shared "Outreach Summary_interim report" with you.
Date: Tuesday, May 25, 2021 8:59:33 AM
Attachments: [AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)

Also, have a random 11 am on my schedule - not our team meeting - trying to figure out what it is.

From: Daniel-Davis, Laura E
Sent: Tuesday, May 25, 2021 8:52 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Scott, Janea A <janea_scott@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>; Diera, Alexx A <adiera@blm.gov>; Lefton, Amanda B <Amanda.Lefton@boem.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: Daniel-Davis, Laura E shared "Outreach Summary_interim report" with you.



Daniel-Davis, Laura E shared a file with
you

I think it will be helpful to have all this info in one place. Can you all help populate?
Thanks!




Outreach Summary_interim report



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From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.
Date: Tuesday, May 25, 2021 8:57:38 AM

(b) (6)

And thank you!

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, May 25, 2021 8:03 AM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: RE: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

There were just a few things! Attached is the clean version.
Alex

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Tuesday, May 25, 2021 5:17 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

Yes, let's do a clean for him, knowing there are a few more things we are running down. I can note that. Thanks!

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Monday, May 24, 2021 8:57 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: RE: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

This is the most final, but there are still a few things to be addressed from yesterday and today. Would you like me to do a version that is clean clean to send to him and we can figure out how to deal with these items later?

I thought I saw our folks in the doc earlier but no changes have been made – it's a busy day!

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Monday, May 24, 2021 6:54 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

Yes, showing up. What version should I share with Larry...?

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Monday, May 24, 2021 6:25 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Kelly, Katherine P

<Kate_Kelly@ios.doi.gov>

Subject: Re: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

Should be showing up now as introduction. I think my file is syncing but please let me know if it isn't!

From: Sanchez, Alexandra L

Sent: Monday, May 24, 2021 4:09:48 PM

To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>

Subject: RE: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

Doing now!

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>

Sent: Monday, May 24, 2021 4:07 PM

To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>

Subject: Re: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

Can we put Kate's framing section at the top as "overview"? It's slightly less than a exec summary so thinking that works. But we need to use it! And then I'd like to share the updated report with Larry.

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Sent: Monday, May 24, 2021 5:01 PM

To: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>

Subject: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.



Sanchez, Alexandra L shared a file with you

Kate's edits in this latest version!
Alex



DRAFT Report 052121



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From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#); [Feldgus, Steven H](#); [Scott, Janea A](#); [Culver, Nada L](#); [Jackson, Danna R](#); [Diera, Alexx A](#); [Lefton, Amanda B](#); [Knodel, Marissa S](#)
Subject: Daniel-Davis, Laura E shared "Outreach Summary_interim report" with you.
Date: Tuesday, May 25, 2021 8:52:08 AM
Attachments: [AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)



Daniel-Davis, Laura E shared a file with
you

I think it will be helpful to have all this info in one place. Can you all help populate?
Thanks!



Outreach Summary_interim report



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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L replied to a comment in "DRAFT Report 052121"
Date: Tuesday, May 25, 2021 12:59:15 AM
Attachments: [acf5dd02-9f34-4707-b99b-fd3983771cdd](#)
[30ef9a37-8fac-4f78-aed3-7020d2f4e706](#)
[19c17e45-e805-4726-84df-ccc3a2b56b76](#)
[453caa6e-7c91-44a2-a2ae-8754e0078371](#)
[36dc836b-97ec-4efa-bf53-f8224645247f](#)



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You left a comment



Culver, Nada L replied

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From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: Daniel-Davis, Laura E mentioned you in "DRAFT Report 052121".
Date: Monday, May 24, 2021 8:50:50 PM
Attachments: [AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)



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Sanchez, Alexandra L left a comment



Daniel-Davis, Laura E mentioned you

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From: [Scott, Janea A](#)
To: [Sanchez, Alexandra L](#)
Subject: Scott, Janea A left a comment in "DRAFT Report 052121"
Date: Monday, May 24, 2021 7:09:44 PM
Attachments: [260c9546-0451-4fc5-a1a9-bdf5ec21a1c6](#)
[9d1bff40-d914-4e89-8a9d-1639a48936c6](#)
[8dcb4993-1678-4f98-afed-abe2e53c8674](#)
[3c7dd444-8cc8-41de-a287-ba268a5f6f2d](#)



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Scott, Janea A added a comment

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From: [Mabry, Scott](#)
To: [Sanchez, Alexandra L](#); [Herbst, Lars](#)
Cc: [Macdonald, Cara Lee](#)
Subject: RE: Question about BSEE for report
Date: Monday, May 24, 2021 1:05:49 PM

Hi Alex,

That may be something the BOEM economics group is doing. Can you send me that page or paragraph of the report so we have a little more context?

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Monday, May 24, 2021 1:01 PM
To: Mabry, Scott <Scott.Mabry@bsee.gov>; Herbst, Lars <Lars.Herbst@bsee.gov>
Cc: Macdonald, Cara Lee <cara_macdonald@ios.doi.gov>
Subject: Question about BSEE for report


Scott and Lars,

This is a line in the report. I wanted to check with you to see if we can include BSEE here?

Thank you very much!

Alex

(b) (5)



Alexandra Sanchez (she/her)
Special Assistant
Office of the Assistant Secretary
Land and Minerals Management
U.S. Department of the Interior

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L mentioned you in "DRAFT Report 052121".
Date: Monday, May 24, 2021 12:16:12 AM
Attachments: [AttachedImage](#)
[AttachedImage](#)
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[AttachedImage](#)



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Culver, Nada L mentioned you

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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L left a comment in "DRAFT Report 052121"
Date: Sunday, May 23, 2021 10:52:24 PM
Attachments: [a98aa94f-f8ae-4242-bfd3-236634fb0b33](#)
[d8d89b12-0ddb-43c9-b8dd-be19453fb21e](#)
[1267ff64-3ef7-49bc-9b74-b57b7a0de4a2](#)
[a125d709-408a-4f5a-8fb9-d92713eaaa28](#)



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Culver, Nada L added a comment

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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L mentioned you in "DRAFT Report 052121".
Date: Sunday, May 23, 2021 10:23:06 PM
Attachments: [AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
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E. Michael Abler left a comment



Feldgus, Steven Howard left a comment



Sanchez, Alexandra L left a comment



Culver, Nada L mentioned you

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E. Michael Abler left a comment



Sanchez, Alexandra L left a comment



Culver, Nada L mentioned you

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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L mentioned you in "DRAFT Report 052121".
Date: Sunday, May 23, 2021 10:07:40 PM
Attachments: [AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
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E. Michael Abler left a comment



Sanchez, Alexandra L left a comment



Culver, Nada L mentioned you

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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.
Date: Sunday, May 23, 2021 5:53:03 PM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Yes. I can look soon. Need to skim a few more things for hearing prep for tomorrow and can take a break after that.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 23, 2021 10:46 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: Fwd: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

Happy Sunday!

Any chance you will be able to take a look sometime later today? Laura is hoping for a clean copy tomorrow am. I'm going to jump in later, but I've accepted a lot of changes already. Thank you and let me know!

Alex

From: Sanchez, Alexandra L
Sent: Friday, May 21, 2021 12:57:17 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Scott, Janea A <janea_scott@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>; Diera, Alexx A <adiera@blm.gov>; Lefton, Amanda B <Amanda.Lefton@boem.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.



Sanchez, Alexandra L shared a file with you

Latest version. Let me know if you have questions!
Alex



DRAFT Report 052121



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From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.
Date: Sunday, May 23, 2021 12:36:15 PM
Attachments: [AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)

That sounds good.

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 23, 2021 12:35 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: Re: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

So close! I was going to dive in later this afternoon, too and start accepting more changes. I can check with Nada, who I don't think has jumped in yet, and clean up by the morning. Can do a call, but maybe we check in later today to see status?

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Sunday, May 23, 2021 10:07:17 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.

I went back through, made a couple tiny edits. Do we need to talk tonight with some small group (or just us and Steve?) to adjudicate last edits/comments? I'd like to send a clean copy to Larry first thing tomorrow morning as we head into this insane week. Let me know what you think.

And thank you! So close.
Laura

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, May 21, 2021 2:57 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Scott, Janea A <janea_scott@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>; Diera, Alexx A <adiera@blm.gov>; Lefton, Amanda B <Amanda.Lefton@boem.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.



Sanchez, Alexandra L shared a file with
you

Latest version. Let me know if you have questions!
Alex



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From: [Lefton, Amanda B](#)
To: [Sanchez, Alexandra L](#)
Subject: Lefton, Amanda B replied to a comment in "DRAFT Report 052121"
Date: Saturday, May 22, 2021 4:27:05 PM
Attachments: [d2c793ee-de87-468e-adbe-282aa53cc67e](#)
[4f49a362-8e07-4f4a-86f4-92a1b1c6f661](#)
[5b998f27-23b4-4d4d-a149-f421e499eb2d](#)
[6991b048-b4e5-444f-a34f-7567f1cd5993](#)
[e4d2f474-02d2-4522-865d-db00f91a6185](#)
[16c5282c-9610-46e8-9ca5-3647cbd18212](#)
[4fd391f9-a17c-4d9f-953f-221d389c88db](#)



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Abler, Eugene M left a comment

3 more replies



Knodel, Marissa S left a comment



Knodel, Marissa S left a comment



Lefton, Amanda B replied

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From: [Lefton, Amanda B](#)
To: [Sanchez, Alexandra L](#)
Subject: Lefton, Amanda B replied to a comment in "DRAFT Report 052121"
Date: Saturday, May 22, 2021 4:02:39 PM
Attachments: [7a056e17-cf90-4c77-81f0-b3188387c68f](#)
[157c461e-b74f-470f-bdc4-8a931b9132c9](#)
[135f7075-b979-4dc9-9670-347f2992ab5c](#)
[8f09f3d3-eaf9-4475-a90c-360b1d860919](#)
[a2e72428-e191-47a7-a057-ed8f5b5a683e](#)
[57804507-6b24-4455-8b0b-c6fda152ff82](#)
[d8daedf0-e5f8-44c7-a305-9afd955b153e](#)



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You left a comment

1 more reply



Lefton, Amanda B left a comment



Knodel, Marissa S left a comment



Lefton, Amanda B replied

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From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Knodel, Marissa S replied to a comment in "DRAFT Report 052121"
Date: Friday, May 21, 2021 8:10:54 PM
Attachments:

[e6ddc3d9-1ca3-477c-985d-a5d279e39271](#)
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[c2c30b76-6561-4a10-a293-284ebb66b182](#)
[f79c6f22-b91c-425d-a149-0c08255d435f](#)
[f2880a00-6f92-493c-84f5-d4171f195de9](#)
[2f32f974-1a8e-4bab-bc19-dd34901b5b86](#)
[13da5a9b-b3dd-4289-8d19-2ed2b0420954](#)
[8feabca9-6d9d-48c7-914f-b0d412e7c297](#)
[10151f45-8941-439f-bd81-24211100e210](#)
[c5755669-04df-4590-aa97-03f071cec149](#)
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[5cb48eb6-b001-4e26-95a6-12d49b01990a](#)
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[134681ed-ec8d-4c25-8cc9-d261836cf3de](#)
[573081a7-75bd-49f5-a8b1-621da6bfbff3](#)
[7e851074-099e-43ce-b7b8-e0d64b8c2519](#)
[b149b510-1e4d-4618-843f-7ba861caac6f](#)
[e7c27131-60d6-43de-a5ed-2e2cdf6e5bff](#)
[a9677d59-8221-406b-ab91-48630655ed14](#)
[f769dbc6-1071-400b-a431-f2fee016eef0](#)
[fd145d10-8fc3-4108-88e9-ff29ec9eb196](#)



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Knodel, Marissa S replied

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Knodel, Marissa S replied

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Abler, Eugene M left a comment



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Knodel, Marissa S replied

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Abler, Eugene M left a comment

2 more replies



Lefton, Amanda B left a comment



Knodel, Marissa S left a comment



Knodel, Marissa S replied

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Lefton, Amanda B left a comment



Knodel, Marissa S replied

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You left a comment



Lefton, Amanda B left a comment

Knodel, Marissa S replied

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From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Knodel, Marissa S replied to a comment in "DRAFT Report 052121"
Date: Friday, May 21, 2021 7:44:35 PM
Attachments: [584d0ba0-bf2d-4cb3-9434-7f261bee318a](#)
[f4f2c5e1-31e6-4305-8276-88c56a642c18](#)
[0cd0aabe-c4cd-4479-b582-df0fbaace00b](#)
[cb257159-b549-4d25-8c02-e435da5942c9](#)
[152834a3-dda2-4207-9eb5-c1e690e47744](#)
[20c6685e-bb78-4798-9252-81b12bdd34b6](#)
[b37a7015-a56d-455e-89f0-563984f1a860](#)



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Abler, Eugene M left a comment

1 more reply



Lefton, Amanda B left a comment



Lefton, Amanda B left a comment



Knodel, Marissa S replied

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From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Knodel, Marissa S left a comment in "DRAFT Report 052121"
Date: Friday, May 21, 2021 7:24:28 PM
Attachments: [0cdd965a-8bb6-49f7-a9f9-789655deb601d33df1fe-9556-4857-9b4f-5d490df0706c9332a24a-a61b-473c-a3af-1f564b21a209a8ad83cc-2565-448f-9ee6-5cdec4b707183556c6d2-9032-4bb8-9c39-92d1f18c6bc2c27a44a3-bfc9-407c-85d4-7b289f55985dcf858626-884c-49d9-900b-f5bf05f4826d3bb7815b-c67d-4051-afdf-a6536accd5f5](#)



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Abler, Eugene M left a comment



You left a comment



Lefton, Amanda B left a comment



Knodel, Marissa S replied

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Knodel, Marissa S added a comment

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From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Knodel, Marissa S replied to a comment in "DRAFT Report 052121"
Date: Friday, May 21, 2021 6:59:18 PM
Attachments: [07aa7cff-b7c6-4ddb-b8d1-af81d7fe9f6a](#)
[48dc8b4e-7d28-4d16-bbf0-308f96ca3d0b](#)
[b4377f87-a1e9-407d-86d4-2f02fbfd5092](#)
[715c923d-5716-4b3e-a288-6fd81d47f37f](#)
[76951b8f-02a4-4046-b9a7-7ce560ec7c82](#)



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You left a comment



Knodel, Marissa S replied

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From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Knodel, Marissa S replied to a comment in "DRAFT Report 052121"
Date: Friday, May 21, 2021 6:10:30 PM
Attachments: [f7843bda-f489-4a52-a370-eac7f41dd469](#)
[a8a367bd-51f9-4195-ac4d-af3d938b465c](#)
[9b610850-afff-443f-8f45-bfa1affb16e7](#)
[686e05cf-3322-4f95-b4dc-b0e4fa80925b](#)
[22209526-ec42-485b-ad87-c2e24874f69e](#)
[dd8f5df1-07e1-4435-b23e-691c57341eee](#)
[7ab91984-1f98-4dbd-b17c-66bfe626290b](#)
[9b83a337-3df0-4033-9be0-eb20923fc816](#)
[04ce7d15-6bb5-459e-8b4b-c16dcd7bf809](#)
[948a879c-e2e4-488e-92cb-557401daf6aa](#)
[2e2235e0-5d60-4d91-a854-16b93fb7ad2d](#)
[863a9ede-d629-4d57-a32e-79d31c3f823a](#)
[600f2998-ac12-4a7b-a74b-d3578a53aa25](#)
[cd94bec3-c6b9-4800-955a-302f36f06a82](#)
[c40957c9-9326-4327-ac41-f0f138d223d9](#)
[87dff0f-0427-44dc-b57c-cd2430a78028](#)
[395e452a-5328-4a4b-ad20-d65795a936e2](#)
[8371f279-6214-4fee-8660-b75369c38cfd](#)



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Abler, Eugene M left a comment

2 more replies



Feldgus, Steven Howard left a comment



You left a comment



Lefton, Amanda B replied



Knodel, Marissa S replied

[Go to comment](#)



Abler, Eugene M left a comment



You left a comment



Lefton, Amanda B replied

[Go to comment](#)



Abler, Eugene M left a comment



You left a comment



You left a comment



Lefton, Amanda B replied

[Go to comment](#)



Abler, Eugene M left a comment



You left a comment



Knodel, Marissa S replied

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From: [Lefton, Amanda B](#)
To: [Sanchez, Alexandra L](#)
Subject: Lefton, Amanda B replied to a comment in "DRAFT Report 052121"
Date: Friday, May 21, 2021 5:48:33 PM
Attachments: [8799cb33-a866-4ee5-af73-43294f3a2b6c](#)
[dd4ed48c-f682-485b-9345-37a4434e696b](#)
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[6eba1ae1-3080-4901-a07a-0d2a6de6d0a5](#)
[fccfbd1f-1bd9-4b16-80d1-889925bdd66d](#)
[31ba3f07-5ba8-41c8-9f33-b76de03bddfb](#)
[4b3c8765-f4a3-40e6-85fa-486bc46d8593](#)
[c21f0a07-2e2a-4d37-9b0f-f456c98ba41a](#)
[6f14b7ae-04ef-4886-b5de-f20286e39818](#)
[84c0e34f-a1c0-4fed-902e-101ffa87e0b9](#)
[36c589ce-7015-465d-8c23-c5e1f052b9d8](#)
[65cafca2-2d32-49a8-9f4f-fc2aee7366cb](#)



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Abler, Eugene M left a comment



You left a comment



Lefton, Amanda B replied

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You left a comment



You left a comment



Lefton, Amanda B replied

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Abler, Eugene M left a comment



You left a comment



Lefton, Amanda B replied

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From: [Lefton, Amanda B](#)
To: [Sanchez, Alexandra L](#)
Subject: Lefton, Amanda B left a comment in "DRAFT Report 052121"
Date: Friday, May 21, 2021 5:24:24 PM
Attachments: [8623dc13-b84e-406a-8a01-247b940e6ebc79b797c9-b131-4d78-bd23-131a72daef83e5446bcf-9939-47d7-9422-d3c09c7958103459cca8-2658-4102-b5b9-a59358513907ab209ef4-448a-4a9f-abe5-c3ecb4aae80cdbc5a402-9965-4e1e-9ae4-ac3eee1cea368c74a19f-1fcc-4634-b078-b9b02f86a0f8a0faa921-f1b9-4e9c-81f5-583d1db80835596c0583-5f8a-4769-adfc-c37ff39edb94e04f1e2d-a57c-46d1-84dd-348e64e068d64fae3d45-94bd-4675-9aeb-425e8318be5c5b8e3bcd-8b35-420f-9592-2c6626e307d929711f6f-f8bf-4c20-a2fe-8b81de12a0cc](#)



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You left a comment



Lefton, Amanda B replied

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Abler, Eugene M left a comment

2 more replies



You left a comment



You left a comment



Lefton, Amanda B replied



Lefton, Amanda B replied



Lefton, Amanda B replied

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LB

Lefton, Amanda B added a comment

Go to comment

LB

Lefton, Amanda B added a comment

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From: [Scott, Janea A](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.
Date: Friday, May 21, 2021 3:31:08 PM
Attachments: [image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)

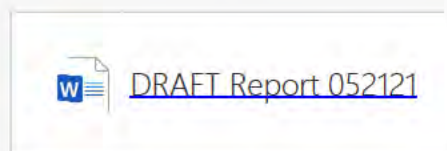
Thanks Alex. When are you looking for comments back?


From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, May 21, 2021 11:57 AM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Scott, Janea A <janea_scott@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>; Diera, Alex A <adiera@blm.gov>; Lefton, Amanda B <Amanda.Lefton@boem.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.



Sanchez, Alexandra L shared a file with you

Latest version. Let me know if you have questions!
Alex



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Open

From: [Sanchez, Alexandra L](#)
To: [Daniel-Davis, Laura E](#); [Feldgus, Steven H](#); [Scott, Janea A](#); [Culver, Nada L](#); [Jackson, Danna R](#); [Diera, Alexx A](#); [Lefton, Amanda B](#); [Knodel, Marissa S](#); [Sanchez, Alexandra L](#)
Subject: Sanchez, Alexandra L shared "DRAFT Report 052121" with you.
Date: Friday, May 21, 2021 2:57:18 PM
Attachments: [AttachedImage](#)
[AttachedImage](#)
[AttachedImage](#)
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Sanchez, Alexandra L shared a file with
you

Latest version. Let me know if you have questions!
Alex



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Open

From: [Klaja, John M](#)
To: [Sanchez, Alexandra L](#)
Cc: [Ravas, Theodore J](#)
Subject: Re: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21
Date: Friday, May 21, 2021 11:02:05 AM

Good Morning Alexandra,

I will reach out to the team at BLM to request the additional photos needed for the report.

Do you have any guidance on which cover design was selected?

Meanwhile, please provide us with an estimate of when we can expect to receive the final text and the revised due date for the report.

Also, please send any infographics and charts ASAP, that we can be working on while waiting for the final text.

Thank you,

John

John Klaja

Visual Information Specialist
U.S. Department of the Interior
Office of Facilities and Administrative Services (OFAS)
Creative Communication Services
1849 C Street NW RM 1647
Washington, DC 20240
Mobile: 202-421-4195
John_Klaja@ios.doi.gov

For more information visit our website at: <http://www.doi.gov/ofas>
Graphics mailbox ofas_creative_services@ios.doi.gov

From: "Sanchez, Alexandra L" <alexandra_sanchez@ios.doi.gov>
Date: Thursday, May 20, 2021 at 1:27 PM
To: "Klaja, John M" <john_klaja@ios.doi.gov>
Cc: "Ravas, Theodore J" <theodore_ravas@ios.doi.gov>
Subject: RE: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Will send shortly. For now, I did receive these comments on the cover pictures. Please let me know if you have questions.

- We like the offshore rig picture, but think we should have both an onshore and offshore

picture given the report covers both.

- Is there an orphaned or abandoned well photo, or a photo of methane being flared?
- Are there any pictures of schools or homes near a drill site, or living with an orphaned well on their property?
- Can you include a picture of Chaco Canyon, Arctic tundra in the NPR-A, or underwater canyons?

From: Klaja, John M <john_klaja@ios.doi.gov>

Sent: Thursday, May 20, 2021 10:52 AM

To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>

Subject: RE: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Hi Alexandra,

I'm following up on my email from earlier today.

Please send the Oil & Gas Report info to me directly today at your earliest convenience. Also, please provide the date that we can expect final text next week so that we can plan accordingly.

Thank you,

John

From: Klaja, John M

Sent: Thursday, May 20, 2021 8:17 AM

To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>

Subject: RE: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Good Morning Alexandra,

Yes, please do resend if you have any chart or graphic info in advance.

Much appreciated,

John

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Sent: Thursday, May 20, 2021 8:09 AM

To: Klaja, John M <john_klaja@ios.doi.gov>

Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>

Subject: RE: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Thank you! I thought I had sent info along earlier this week. I can take a look in a bit and resend. Also, I wanted to let you know that the report is delayed so we don't expect to have the text over to you until next week, unfortunately.

Let me know if this is ok for your scheduling purposes.

Thanks,

Alex

From: Klaja, John M <john_klaja@ios.doi.gov>

Sent: Wednesday, May 19, 2021 2:38 PM

To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>

Subject: Re: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Good Afternoon Alexandra,

Hope this finds you well.

Sorry it took so long to get this to you, but you asked me to identify the source and subject matter of all photos used on the **Interim Report on the Federal Oil & Gas Leasing and Permitting Programs – Summer 2021**

Attached is a PDF with that info next to each photo. Hope this helps.

Also please send along any charts, Infographics, etc. so that we can get a head start on creating those while we wait for the Final Text document.

Thank you,

John

John Klaja

Visual Information Specialist

U.S. Department of the Interior

Office of Facilities and Administrative Services (OFAS)

Creative Communication Services

1849 C Street NW RM 1647

Washington, DC 20240

Mobile: 202-421-4195

John_Klaja@ios.doi.gov

For more information visit our website at: <http://www.doi.gov/ofas>

Graphics mailbox ofas_creative_services@ios.doi.gov

From: "Sanchez, Alexandra L" <alexandra_sanchez@ios.doi.gov>
Date: Thursday, May 13, 2021 at 5:00 PM
To: "Klaja, John M" <john_klaja@ios.doi.gov>
Cc: "Ravas, Theodore J" <theodore_ravas@ios.doi.gov>
Subject: RE: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Great – thank you very much!

And just wanted to let you know, we are working hard to get you the draft by the 20th, but may be a day or two late. I will keep you posted. And we understand that will affect the time we get it back. That's on us!

Thanks,
Alex

From: Klaja, John M <john_klaja@ios.doi.gov>
Sent: Thursday, May 13, 2021 9:42 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>
Subject: RE: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Hi Alexandra,

Fortunately the photos came from just a handful of sources: BSSE, BLM and a stock photo agency. Reaching out to Eugene Berry at BSSE now for exact photo captions & locations and will provide them as soon as I hear back.

Thank you,

John

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Wednesday, May 12, 2021 5:58 PM
To: Klaja, John M <john_klaja@ios.doi.gov>
Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>
Subject: RE: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Thank you!

Can you list out the locations and other details you have on the photos? I'm sure I will be asked. These look really great. We will get back to you soon.

Thanks, John.

From: Klaja, John M <john_klaja@ios.doi.gov>

Sent: Wednesday, May 12, 2021 3:05 PM

To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>

Cc: Ravas, Theodore J <theodore_ravas@ios.doi.gov>

Subject: PDF of INTERIM OIL & GAS LEASING PROGRAM REPORT --- COVER COMPS --- 5-12-21

Good Afternoon Alexandra,

Attached please find several cover comps of the report for your review. Some are simpler, and others more involved with a variety of photos and layout options.

Page 6 is my personal favorite. Please let me know if you want to make any photo or image placement adjustments before you share these with your team.

Thank you,

John

John Klaja

Visual Information Specialist

U.S. Department of the Interior

Office of Facilities and Administrative Services (OFAS)

Creative Communication Services

1849 C Street NW RM 1647

Washington, DC 20240

Mobile: 202-421-4195

John_Klaja@ios.doi.gov

For more information visit our website at: <http://www.doi.gov/ofas>

Graphics mailbox ofas_creative_services@ios.doi.gov

From: [Dawe, Christine -FS](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008
Date: Thursday, May 20, 2021 6:03:29 PM

Hi Alex, I got over run by a few big issues this week. I will get you our input tomorrow. I have blocked of some dedicated time to make sure I get this done and back to you. Thanks for your patience.

Christine Dawe, Acting Chief of Staff

Office of the Under Secretary
Natural Resources and Environment
United States Department of Agriculture (USDA)
406-370-8865
christine.dawe@usda.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, May 18, 2021 12:30 PM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Culver, Nada L <nculver@blm.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: RE: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

Hi Christine,
If you could get us back your input by close of business Thursday, that would be great.
Thank you very much!
Alex

From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Tuesday, May 18, 2021 11:15 AM
To: Culver, Nada L <nculver@blm.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: [EXTERNAL] RE: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

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Thanks Nada. What's the timeframe you would like our input back to you?

Christine Dawe, Acting Chief of Staff

Office of the Under Secretary
Natural Resources and Environment
United States Department of Agriculture (USDA)
406-370-8865
christine.dawe@usda.gov

From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, May 18, 2021 10:48 AM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: close hold - deliberative draft for review - RE: circling back - o&g report/EO 14008

Hi Christine and Team Forest Service – Attached are some excerpts from the current draft of the interim report. (b) (5)

[REDACTED]

Thanks again for your interest in this. I've included Alex Sanchez, the holder of the report, here, too. She and I are happy to answer questions, as well.

We appreciate you holding this close, since it is still in draft and review.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, May 7, 2021 12:39 PM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: [EXTERNAL] RE: circling back - o&g report/EO 14008

Thanks Christine! On our to-do list to send you something to look at! We've had a couple internal meetings that led to some additional tinkering. We will get something over to you soon.

Laura

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From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Friday, May 7, 2021 2:36:36 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] RE: circling back - o&g report/EO 14008

Hi Laura, Just checking to see if I missed an email this week, or if you are still working on the draft report. No rush, I just didn't want to miss a deadline. Thanks

Christine Dawe, Acting Chief of Staff

Office of the Under Secretary
Natural Resources and Environment
United States Department of Agriculture (USDA)
1400 Independence Avenue, SW
Washington, DC 20250-0108
406-370-8865
christine.dawe@usda.gov

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, April 30, 2021 1:02 PM
To: Dawe, Christine -FS <christine.dawe@usda.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: [EXTERNAL] RE: circling back - o&g report/EO 14008

Great - we will send you something to look at early next week. Thank you,
Laura

From: Dawe, Christine -FS <christine.dawe@usda.gov>
Sent: Friday, April 30, 2021 2:12 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: [EXTERNAL] RE: circling back - o&g report/EO 14008

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(b) (5)

Christine Dawe, Acting Chief of Staff

Office of the Under Secretary
Natural Resources and Environment
United States Department of Agriculture (USDA)
1400 Independence Avenue, SW
Washington, DC 20250-0108
406-370-8865
christine.dawe@usda.gov

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, April 30, 2021 11:56 AM
To: Bonnie, Robert - OSEC, Washington, DC <Robert.Bonnie@usda.gov>; Dawe, Christine -FS <christine.dawe@usda.gov>; French, Chris- FS <Christopher.French@usda.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: circling back - o&g report/EO 14008

Hi there,

Wanted to check in (b) (5)

Thanks,
Laura and Nada

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From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: Interim report
Date: Thursday, May 20, 2021 4:14:29 PM

Thanks!

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, May 20, 2021 4:11 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>; Lefton, Amanda B <Amanda.Lefton@boem.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: FW: Interim report

FYI, too! I'll add these in as appropriate.
Alex

From: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>
Sent: Thursday, May 20, 2021 2:05 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>
Subject: RE: Interim report

Hi Alex and Nada:

Attached a just a few edits on the report: (b) (5)

Thanks for the chance to review, and let me know if you have any questions.

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, May 20, 2021 1:20 PM
To: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>
Subject: RE: Interim report

If it's just a few things, that's fine to use the version you have. Just trying to get all the edits in the master doc!

Thanks,
Alex

From: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>
Sent: Thursday, May 20, 2021 8:37 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: Interim report

Hi Alex:

I chatted with Nada about just a few redlines last night, so yes: if there's a newer version, I'll take that before making edits.

Thanks!

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Wednesday, May 19, 2021 2:34 PM
To: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>
Subject: RE: Interim report

Hi Travis – have you started reviewing yet? If not, can I send a different version?
If you have started, don't worry about it, just wanted to check!

Thanks,
Alex

From: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>
Sent: Tuesday, May 18, 2021 8:38 PM
To: Culver, Nada L <nculver@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>;
Diera, Alexx A <adiera@blm.gov>
Subject: RE: Interim report

Thanks all. Will try to get this done tomorrow. I know we're under the gun.

From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, May 18, 2021 11:53 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>; Diera, Alexx A <adiera@blm.gov>
Subject: RE: Interim report

If you have thoughts or questions, please start with Alex, the keeper of the document and resolver of all the many (did I mention MANY) thoughts we've received to date, and she can also loop in me or Amanda.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management

Cell: 202-255-6979

nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, May 18, 2021 9:52 AM
To: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>; Diera, Alexx A <adiera@blm.gov>; Culver, Nada L <nculver@blm.gov>
Subject: RE: Interim report

Hello, Travis!

Attached is the latest version of the report, that is currently in copy edit.

From: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>
Sent: Tuesday, May 18, 2021 9:26 AM
To: Diera, Alexx A <adiera@blm.gov>; Culver, Nada L <nculver@blm.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: Interim report

Thank you!

From: Diera, Alexx A <adiera@blm.gov>
Sent: Tuesday, May 18, 2021 11:25 AM
To: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>; Culver, Nada L <nculver@blm.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Interim report

Welcome back, Travis!

Looping in +Alex who has the pen on the interim report.

Alexx Diera (*she/her*)
Special Assistant
Bureau of Land Management
U.S. Department of the Interior

From: Annatoyn, Travis J <travis.annatoyn@sol.doi.gov>
Sent: Tuesday, May 18, 2021 11:19 AM
To: Diera, Alexx A <adiera@blm.gov>; Culver, Nada L <nculver@blm.gov>
Subject: Interim report

Hi Alexx:

Hope you're well! Any chance you could forward me the latest version of the above for a quick red flag review?

Best,

Travis