

From: [Anna Peterson](#)
To: [Energy Review](#)
Subject: [EXTERNAL] Additional Information for Interim Report Re: Review of Pause to New Oil and Gas Leasing // The Mountain Pact
Date: Thursday, April 15, 2021 7:47:25 PM
Attachments: [Mountain Pact Header.png](#)
[anna signature.png](#)
[Western Community Support for Oil Gas Pause Resolution.pdf](#)
[Town of Ridgway Oil and Gas Pause Resolution 3.10.21.pdf](#)
[Town of Basalt, Colorado Res 15 2021 - Support Temporary Pause on Oil and Gas Leases on Federal Public Lands.pdf](#)
[Santa Fe County Resolution 2021-032.pdf](#)

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Hello,

Please see attached and below for additional information from The Mountain Pact to help inform your report regarding The Department of Interior's review of the pause to new oil and gas leasing on federal public lands.

Note that there are other Mountain Pact communities with similar resolutions on their upcoming town/city council or county commission agendas. I will submit those as soon as I have them.

Please let me know if I can get you any more information.

Thank you,
Anna



April 15, 2021

SUBMITTED VIA E-MAIL: energyreview@ios.doi.gov

The Honorable Deb Haaland Secretary of the Interior 1849 C Street Washington, D.C. 20240

Dear Secretary Haaland:

The Mountain Pact is an organization that works with local elected officials in over 80 mountain communities across the west with outdoor recreation-based economies to speak with a collective voice on federal climate, public lands, and outdoor recreation policy. Thank you for the opportunity to provide recommendations to the Interior Department as it reviews the federal onshore oil and gas program.

We strongly support the administration's decision to pause the program to provide the department time for a thorough review. Many of the communities in the Mountain Pact network have recently passed resolutions in support of President Biden's [pause on new oil and gas leasing on federal public lands](#). ***See attached resolutions from Santa Fe County, New Mexico, as well as the Town of Basalt and the Town of Ridgway, Colorado.***

As the resolutions state, "Our vast network of federal public lands offer abundant natural beauty and a wealth of natural resources, a vital economic engine for local communities, and provide a unique quality of life for residents of communities adjacent to them. It's critical that our public lands and waters are managed responsibly and sustainably so they can remain open and accessible to present and future generations."

The Mountain Pact works with local elected leaders who have a strong responsibility to take and support prudent and pragmatic steps to reverse climate change and mitigate its devastating impacts by reducing the amount of greenhouse gases and other forms of pollution that contribute to climate change. [One-quarter of the country's greenhouse gas emissions come from the development of fossil fuels on public lands](#). Western mountain communities bear the brunt of climate impacts from severe heat and drought, which are making wildfires more frequent and extreme; an increase in emissions of methane, a powerful greenhouse gas emitted on our public lands; extremes in precipitation; and dust on snow, which causes snowfall to evaporate prematurely. Additionally, in [2018 pollution caused by the burning of fossil fuels caused 8.7 million or one in five deaths globally](#) - we must take bold climate action now.

Our federal public lands should be managed to ensure that the companies extracting natural resources provide a fair return to federal and state taxpayers and also protect the environment and wildlife and their habitat, and provide the opportunity for the development of sustainable economic non-extractive activity such as outdoor recreation.

In addition to supporting the oil and gas leasing pause, the resolutions also ask the Biden administration to "modernize the federal oil and gas leasing program to ensure the oil and gas companies that hold leases and extract natural resources provide a fair return to federal and state taxpayers and develop a plan to phase out the production of fossil fuels, which are a major contributor to climate change, in a way that also supports the workers, communities, and states that currently have fossil fuel-dependent economies."

We support the legal requirement that our federal lands be managed under the 'multiple use' standard to best meet the present and future needs of the American people and believe that the federal land management policies should be developed with input from local communities and public land users, and incorporate the best available science.

By pausing the federal oil and gas leasing for the first time in 40 years, the Biden administration has rightly recognized that it is fundamentally broken and must be overhauled to address the climate crisis, generate a fair return for taxpayers, respect local landowners, and support communities in their inevitable transition away from fossil fuels.

Thank you,

A handwritten signature in black ink, appearing to read 'Anna Peterson', written over a light blue rectangular background.

Anna Peterson, Executive Director The Mountain Pact



ANNA PETERSON

Executive Director | The Mountain Pact

Durango, Colorado | (612) 735-2402 | anna@themountainpact.org

[Subscribe to get our policy alerts](#)

Founded in 2014, [The Mountain Pact](#) mobilizes local elected officials in over 80 Western mountain communities with outdoor recreation based economies to speak with a collective voice on federal climate, public lands, and outdoor recreation policy.

From: [Sanchez, Alexandra L](#)
To: [Energy Review](#)
Cc: [Diera, Alexx A](#); [Culver, Nada L](#)
Subject: FW: [EXTERNAL] Advance copy: New EPIC book on U.S. energy & climate policy
Date: Friday, April 9, 2021 12:52:13 PM
Attachments: [EPIC Policy Book Summary embargoed.pdf](#)
[Oil Gas 1pager embargoed.pdf](#)
[Coal 1pager embargoed.pdf](#)

Flagging these comments to our energy review email!

From: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Sent: Monday, March 29, 2021 7:55 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <adiera@blm.gov>; Culver, Nada L <nada_culver@ios.doi.gov>
Subject: FW: [EXTERNAL] Advance copy: New EPIC book on U.S. energy & climate policy

One-pagers that could be considered 'comments' for the energy review.

From: Michael Greenstone <mgreenst@uchicago.edu>
Sent: Monday, March 22, 2021 4:54 PM
To: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Subject: [EXTERNAL] Advance copy: New EPIC book on U.S. energy & climate policy

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Dear Ms. Kelly,

I am delighted to share with you today an advance copy of [U.S. Energy and Climate Roadmap](#), a compilation of practical and cost-effective ideas from University of Chicago scholars that confront climate change while ensuring that energy remains affordable and that costs don't continue to disproportionately fall on communities of color and the economically vulnerable.

Grounded in empirical research galvanized by rigorous academic debate and channeled into practical policy applications, the book offers a comprehensive guide for the next four years and beyond. Its recommendations range from ways to update the Social Cost of Carbon to principles for pricing carbon, and detailed proposals for implementing a clean electricity standard, improving fuel efficiency standards, protecting the public interest in oil and gas leasing, and ensuring that coal prices reflect the fuel's full environmental costs.

We look forward to publicly releasing *U.S. Energy and Climate Roadmap* this week and would be

happy to discuss any and all aspects of it with you or your colleagues. I thought you might be particularly interested in the chapters on fossil fuel extraction on federal lands, so I have included one-page summaries of them here. While we ask that you not share the book publicly until it is officially released, please feel free to share it with your close network.

Sincerely,

michael

Milton Friedman Distinguished Service Professor in Economics and the College
Director of the Energy Policy Institute at Chicago
University of Chicago
Kenneth C. Griffin Department of Economics
Email: mgreenst@uchicago.edu
<http://www.michaelgreenstone.com/>
Phone: 773-702-8250

From: [Frank, Wright J](#)
To: [Energy Review](#)
Cc: [Stork, Allison J](#)
Subject: FW: [EXTERNAL] AEWC Letter Re: Meeting Request & Comprehensive Review of the Fed. Oil and Gas Program
Date: Friday, April 9, 2021 5:20:15 PM
Attachments: [AEWC 4.8.21 to Sec Haaland Dir Lefton.pdf](#)

From: Lima, James <James.Lima@boem.gov>
Sent: Friday, April 9, 2021 5:16 PM
To: Frank, Wright J <Wright.Frank@boem.gov>
Cc: Kendall, James J. <James.Kendall@boem.gov>
Subject: Fw: [EXTERNAL] AEWC Letter Re: Meeting Request & Comprehensive Review of the Fed. Oil and Gas Program

Good afternoon, Wright

I am forwarding to you are letter from the Alaska Eskimo Whaling Commission to the Secretary regarding the comprehensive review.

James Lima, Ph.D.
Minerals Leasing Specialist
Bureau of Ocean Energy Management
3801 Centerpoint Drive, Ste. 500
Anchorage, Alaska 99503
(907_334-5266

From: Kendall, James J. <James.Kendall@boem.gov>
Sent: Friday, April 9, 2021 1:11 PM
To: BOEM AOCSR Supvrs_Mangrs <boemaocsrsvprvs_mangrs@boem.gov>; Howard, Ameer <amee.howard@boem.gov>; Lima, James <James.Lima@boem.gov>; Haller, Michael L <Michael.Haller@boem.gov>
Cc: AK ORD, BOEM <BOEMAKORD@boem.gov>
Subject: FW: [EXTERNAL] AEWC Letter Re: Meeting Request & Comprehensive Review of the Fed. Oil and Gas Program

FYSA

Dr. James (Jim) Kendall
Regional Director, Alaska Regional Office
Bureau of Ocean Energy Management
Department of the Interior Region 11

3801 Centerpoint Drive, Suite 500
Anchorage, Alaska, 99503-5823
Office: 907-334-5200
Cell: 907-250-3852
james.kendall@boem.gov

From: Lesley Hopson <LHopson@awec-alaska.com>

Sent: Thursday, April 08, 2021 4:28 PM

To: atabdiel_razo@ios.doi.gov; Lefton, Amanda B <amanda_lefton@ios.doi.gov>; Robinson, Blossom <Blossom.Robinson@boem.gov>; Energy Review <energyreview@ios.doi.gov>; OS, feedback <Feedbackold@ios.doi.gov>

Cc: Swanson, Kevin <Kevin.Swanson@mail.house.gov>; Reed, Truman <Truman.Reed@mail.house.gov>; O'Connor, Jamie (Murkowski) <Jamie_O'Connor@murkowski.senate.gov>; Elam, Erik (Sullivan) <Erik_Elam@sullivan.senate.gov>; Wolgemuth, Kate (Sullivan) <Kate_Wolgemuth@sullivan.senate.gov>; Harry Brower <harry.brower@north-slope.org>; Janell Kaleak <Janell.Kaleak@north-slope.org>; John Hopson Jr. <johnpearl40@icloud.com>; George Kaleak <george.kaleak@north-slope.org>; Julius Rexford <jrexford@asrc.com>; John Waghiyi Jr. <kandqwaaghyi@gmail.com>; Edmond Apassingok <edmondrapassingok@yahoo.com>; Austin Swan Sr. <atchugunnaq@gmail.com>; Thomas Napageak <thomasnapageakjr@yahoo.com>; Herbert Kinneeveauk III <Herb.Kinneeveauk3@north-slope.org>; ozennaronald@yahoo.com; Crawford Patkotak <cpatkotak@asrc.com>; Debra Seetook <cachecreekkid99783@gmail.com>; Kendall, James J. <James.Kendall@boem.gov>; satuzroyluk@inupiatvoice.org; morrie.lemen@inupiatgov.com; Jessica Lefevre <jessica@lefevre.law.org>; Dawn Winalski <dawn@dawnwinalski.com>; Robert Suydam <Robert.Suydam@north-slope.org>; walter_cruickshank@boem.gov

Subject: [EXTERNAL] AEWC Letter Re: Meeting Request & Comprehensive Review of the Fed. Oil and Gas Program

Importance: High

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Good afternoon all,

I have been asked to forward the attached letter.

Thank you,

LESLEY HOPSON
ADMINISTRATIVE MANAGER
ALASKA ESKIMO WHALING COMMISSION
P.O. BOX 570
BARROW, ALASKA 99723
PH: 907.852.2392
FAX: 907.852.2303
LHOPSON@AEWC-ALASKA.COM

~ To safeguard the bowhead whale and its habitat, and to defend the bowhead whale aboriginal hunting rights of its members to preserve the cultural and traditional values of its member communities ~

From: [Lesley Hopson](#)
To: atabdiel_razo@ios.doi.gov; [Lefton, Amanda B](#); [Robinson, Blossom](#); [Energy Review](#); [OS, feedback](#)
Cc: [Swanson, Kevin](#); [Reed, Truman](#); [O'Connor, Jamie \(Murkowski\)](#); [Elam, Erik \(Sullivan\)](#); [Wolgemuth, Kate \(Sullivan\)](#); [Harry Brower](#); [Janell Kaleak](#); [John Hopson Jr.](#); [George Kaleak](#); [Julius Rexford](#); [John Waghiyi Jr.](#); [Edmond Apassingok](#); [Austin Swan Sr.](#); [Thomas Napageak](#); [Herbert Kinneeveauk III](#); ozennaronald@yahoo.com; [Crawford Patkotak](#); [Debra Seetook](#); [Kendall, James J.](#); satuzroyluk@inupiatvoice.org; morrie.lemen@inupiatgov.com; [Jessica Lefevre](#); [Dawn Winalski](#); [Robert Suydam](#); walter_cruickshank@boem.gov
Subject: [EXTERNAL] AEW C Letter Re: Meeting Request & Comprehensive Review of the Fed. Oil and Gas Program
Date: Thursday, April 8, 2021 8:28:44 PM
Attachments: [AEWC 4.8.21 to Sec Haaland_Dir Lefton.pdf](#)
Importance: High

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Good afternoon all,

I have been asked to forward the attached letter.

Thank you,

LESLEY HOPSON
ADMINISTRATIVE MANAGER
ALASKA ESKIMO WHALING COMMISSION
P.O. BOX 570
BARROW, ALASKA 99723
PH: 907.852.2392
FAX: 907.852.2303
LHOPSON@AEWC-ALASKA.COM

*~ To safeguard the bowhead whale and its habitat, and to defend the bowhead whale
aboriginal hunting rights of its members to preserve the cultural and traditional values of its
member communities ~*

From: [Kelsie Rudolph](#)
To: [Energy Review](#)
Subject: [EXTERNAL] Alaska Wilderness League comment letter
Date: Thursday, April 15, 2021 5:10:26 PM
Attachments: [2021_04_15_AWL_comments_for_DOI_federal_oil_and_gas_review.pdf](#)

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Hello,

Attached is a letter from Alaska Wilderness League to be submitted for the Federal Oil and Gas Program review comment period.

Please reach out if you have any questions,
Kelsie Rudolph

**ALASKA
WILDERNESS
LEAGUE**
AND AFFILIATE
**ALASKA
WILDERNESS
LEAGUE|ACTION**

KELSIE RUDOLPH
SHE/HER/HERS
Arctic Campaign Manager

122 C St NW, Ste 240
Washington, DC 20001
Tel: 202-544-5205
Fax: 202-544-5197
www.AlaskaWild.org
www.AlaskaWildAction.org

From: [Appel, Elizabeth K](#) on behalf of [Consultation, IA](#)
To: [Teran Villa](#); [Energy Review](#)
Cc: [Amber Carrillo](#); [Thelma Antonio](#); [Tyla L. Chopito](#)
Subject: Re: [EXTERNAL] APCG's Recommendations to Department of Interior on Comprehensive Review of Oil and Gas
Date: Friday, April 23, 2021 12:57:27 PM

Thank you for your comments. We will be reviewing them closely.

From: Teran Villa <TVilla@indianpueblo.org>
Sent: Thursday, April 15, 2021 11:24 AM
To: Consultation, IA <consultation@bia.gov>; Energy Review <energyreview@ios.doi.gov>
Cc: Amber Carrillo <ACarrillo@indianpueblo.org>; Thelma Antonio <TAntonio@indianpueblo.org>; Tyla L. Chopito <TLChopito@indianpueblo.org>
Subject: [EXTERNAL] APCG's Recommendations to Department of Interior on Comprehensive Review of Oil and Gas

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Greetings,

On behalf of the Wilfred Herrera Jr. – Chairman, of the All Pueblo Council of Governors (“APCG”), I submit the attached document to the Honorable Deb Haaland - Interior Secretary, which provides recommendations on the Department’s comprehensive review under Executive Order 14008 of the Oil and Gas Permitting and Leasing Program.

Should you have any questions, APCG staff are available and are Cc’d on this email submission.

Respectfully,

Teran Villa (He/Him)
Policy Coordinator
All Pueblo Council of Governors
2401 12th Street NW, Suite 214 S
Albuquerque, NM 87104
O: 505.212.7041
C: 505.301.9062
tvilla@indianpueblo.org

From: [Teran Villa](#)
To: [Consultation, IA: Energy Review](#)
Cc: [Amber Carrillo](#); [Thelma Antonio](#); [Tyla L. Chopito](#)
Subject: [EXTERNAL] APCG's Recommendations to Department of Interior on Comprehensive Review of Oil and Gas
Date: Thursday, April 15, 2021 11:25:31 AM
Attachments: [\(FINAL\) APCG's Comments to DOI on Oil and Gas Program.pdf](#)

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Greetings,

On behalf of the Wilfred Herrera Jr. – Chairman, of the All Pueblo Council of Governors (“APCG”), I submit the attached document to the Honorable Deb Haaland - Interior Secretary, which provides recommendations on the Department’s comprehensive review under Executive Order 14008 of the Oil and Gas Permitting and Leasing Program.

Should you have any questions, APCG staff are available and are Cc’d on this email submission.

Respectfully,

Teran Villa (He/Him)
Policy Coordinator
All Pueblo Council of Governors
2401 12th Street NW, Suite 214 S
Albuquerque, NM 87104
O: 505.212.7041
C: 505.301.9062
tvilla@indianpueblo.org

From: [Frank Macchiarola](#)
To: [Energy Review](#)
Subject: [EXTERNAL] API Testimony - DOI oil and gas leasing review forum (March 25, 2021)
Date: Thursday, March 25, 2021 12:47:24 PM
Attachments: [image001.png](#)
[Opening Statement for March 25 DOI Virtual Forum FINAL.pdf](#)

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Please find attached, API's testimony for the US Department of the Interior's Federal Oil and Gas Leasing Review Forum of 3/25/21. Thank you for the opportunity to participate in today's forum. Please let us know if you have any questions.

Best,
Frank



Frank J. Macchiarola
Senior Vice President
Policy, Economics & Regulatory Affairs

202-682-8167
macchiarolaf@api.org

From: [Alex Daue](#)
To: [Energy Review](#)
Cc: [Culver, Nada L](#); [Alonso, Shantha R](#); [Kelly, Katherine P](#)
Subject: [EXTERNAL] Appendices B-F RE: TWS recommendations on the Interior Department's review of the federal oil and gas program (email 2)
Date: Thursday, April 15, 2021 7:03:06 PM
Attachments: [TWS Comprehensive Review Letter Appendices B-F.pdf](#)

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Please see attached for appendices B-F.

From: Alex Daue
Sent: Thursday, April 15, 2021 4:57 PM
To: energyreview@ios.doi.gov
Cc: nculver@blm.gov; shantha_alonso@ios.doi.gov; Kate Kelly <kate_kelly@ios.doi.gov>
Subject: TWS recommendations on the Interior Department's review of the federal oil and gas program (email 1)

Hello,

Please accept the attached comment letter on behalf of The Wilderness Society. Note that we are sending Appendices B-F in a separate email because of the large file size.

We appreciate the opportunity to comment.

Sincerely,

Alex Daue (he/him/his)
Assistant Director, Energy & Climate
The Wilderness Society | The Wilderness Society Action Fund
ph 720-647-9369
1660 Wynkoop St # 1150, Denver, CO 80202

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From: [Kristina Trotta](#)
To: [Energy Review](#)
Subject: [EXTERNAL] Aquarium Comment on Interim Oil and Gas Development
Date: Thursday, April 15, 2021 3:58:31 PM
Attachments: [Joint Aquarium Statement on OCS Program April 2021.pdf](#)

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On behalf of the nation's leading aquariums, I am submitting the attached statement on oil and gas development in the U.S. outer continental shelf. We look forward to seeing the results of the report and working with the Department of the Interior on this and other issues affecting our oceans and coasts.

Thank you,

Kristina Trotta
Deputy Director, Aquarium Conservation Partnership

Kristina Trotta
Pronouns: She/Her/Hers ([What's this?](#))
kristina.trotta@gmail.com
305.807.8818
Sent from the ancestral lands of the Nacotchtank

From: [Duriez, Marie](#)
To: [Energy Review](#)
Cc: [Anderson, Bridget](#)
Subject: [EXTERNAL] ASRC Comments re: DOI O&G Forum
Date: Thursday, April 15, 2021 2:57:19 PM
Attachments: [image001.png](#)
[ASRC Comments on DOI Oil and Gas Forum 04.15.2021.pdf](#)

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Good Afternoon,

Please see the attached comments in response to the U.S. Department of the Interior's Public Forum on the Federal Oil and Gas Forum – sent on behalf of Bridget Anderson, Vice President of External Affairs.

Best,

Marie B. Duriez

External Affairs Manager
Arctic Slope Regional Corporation
(907) 339-6889



Web: [ASRC.COM](#) Facebook: [WeAreASRC](#) Twitter: [@ASRC_AK](#) Instagram: [WeAreASRC](#)

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From: [Axelrod, Josh](#)
To: [Energy Review](#)
Subject: [EXTERNAL] ATTN: Comments of NRDC re: Interior's Review of Oil and Gas Programs
Date: Thursday, April 15, 2021 3:56:52 PM
Attachments: [NRDC Comments to DOI Re Onshore OG Program Review Final.pdf](#)
[NRDC Petitions to DOI Re Onshore OG Program.pdf](#)

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Dear Secretary Haaland,

On behalf of the Natural Resources Defense Council (NRDC) and our 3 million members and online activists, please find attached preliminary comments expressing NRDC's views and ideas pertaining to the Department of the Interior's onshore oil and gas program. We appreciate the opportunity to provide these comments and look forward to continuing to work with you and the Department as you undertake further review and reform in this critical area.

In addition, please also find attached a brief letter disclosing the number of petitions, returned by our members, calling for major reform and reconsideration of the onshore oil and gas program.

If you have any questions or require any further materials, please don't hesitate to reach out at the numbers and addresses below.

Sincerely,

Joshua Axelrod

--

[Joshua Axelrod](#)
Senior Advocate | Nature Program
NATURAL RESOURCES DEFENSE COUNCIL
1152 15TH STREET NW, SUITE 300
WASHINGTON, DC 20005
P: +1 (202) 289-2379
C: +1 (802) 989-3433
Twitter: @joshaxel
Blog: nrdc.org/experts/josh-axelrod

From: [Alves, Nuno F](#)
To: [Energy Review](#)
Subject: [EXTERNAL] BP America comments on DOI review of the federal oil and natural gas leasing program
Date: Wednesday, April 14, 2021 9:01:55 PM
Attachments: [BP America comments on DOI review of the federal oil and natural gas leasing program 2021-04-15.pdf](#)

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Dear Secretary Haaland,

On behalf of BP America, I'm submitting our comments on the DOI review of the federal oil and natural gas leasing program.

Should you have any questions please do not hesitate to contact me.

Respectfully yours

Nuno Alves, Ph.D.

Senior Manager, Policy & Regulatory Advocacy | **bp Communications & Advocacy**
1101 New York Avenue, Suite 700, Washington D.C., 20005



From: [Buccino, Sharon](#)
To: [Energy Review](#)
Cc: [Sanchez, Alexandra L](#); [Sanchez, Diane](#)
Subject: [EXTERNAL] Buccino Exhibits Part Two
Date: Thursday, March 25, 2021 10:43:10 PM
Attachments: [Kubiak,Lauren, et al. - NRDC Comments for the 2019-2024 Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program.pdf](#)
[Kubiak,Lauren, et al. - NRDC Comments for the 2019-2024 Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program.pdf](#)
[Mall A. - Drilling Down, Protecting Western Communities from the Health and Environmental Effects of Oil and Gas Production.pdf](#)
[Nurses on the Frontlines Unmasking the Influence of Air Pollution, Health Disparities, and Oil and Gas Development on COVID-19.pdf](#)
[Springer, Nikki & Alex Daue, Key Economic Benefits of Renewable Energy on Public Lands.pdf](#)
[Srebotnjak, Tanja, and Miriam Rotkin-Ellman - Fracking Fumes Air Pollution from Fracking Threatens Public Health and Communities.pdf](#)
[The Wilderness Society - Measuring the climate impact of Trump's reckless leasing of public lands.pdf](#)

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SHARON BUCCINO
*Senior Director, Lands
Nature Program*

NATURAL RESOURCES
DEFENSE COUNCIL
1152 15TH ST NW
WASHINGTON, DC 20005
T 202-289-6868
F 202-289-1060
[NRDC.ORG](#)

Please save paper.
Think before printing.

From: [Buccino, Sharon](#)
To: [Energy Review](#)
Cc: [Sanchez, Alexandra L](#); [Sanchez, Diane](#)
Subject: [EXTERNAL] Buccino Testimony and Exhibits
Date: Thursday, March 25, 2021 10:27:31 PM
Attachments: [Buccino Federal Oil and Gas Forum Testimony 3.0.pdf](#)

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Thank you for the opportunity to participate in today's Federal Oil and Gas Forum. I have attached my written testimony for the record. The attached testimony includes a List of Exhibits and List of GAO Reports. I will transmit pdfs of exhibits and GAO report separately.

Sharon

SHARON BUCCINO
*Senior Director, Lands
Nature Program*

NATURAL RESOURCES
DEFENSE COUNCIL
1152 15TH ST NW
WASHINGTON, DC 20005
T 202-289-6868
F 202-289-1060
NRDC.ORG

Please save paper.
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From: [Kim Stevens](#)
To: [Energy Review](#)
Cc: [Kelly, Katherine P](#); [Culver, Nada L](#); [Alonso, Shantha R](#)
Subject: [EXTERNAL] 4,277 Constituent Recommendations for the Comprehensive Review of the Federal Oil and Gas Program
Date: Thursday, April 15, 2021 1:47:37 PM
Attachments: [4,277 DOI Federal Oil and Gas Public Comments April15 .pdf](#)

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April 15, 2021

Submitted via email: energyreview@ios.doi.gov

The Honorable Debra Haaland
Secretary
U.S. Department of the Interior
1849 C St. NW
Washington, D.C. 20240

Re: Constituent Recommendations for the Comprehensive Review of the Federal Oil and Gas Program

Dear Secretary Haaland:

We deeply appreciate the leadership of the Biden Administration, the Department of the Interior (DOI), the Bureau of Land Management (BLM), and the Bureau of Ocean Energy Management (BOEM) in conducting a comprehensive review of the federal oil and gas program and pausing oil and gas leasing during the review.

We collected 4277 comments and recommendations from constituents and public lands users across the country for reforming the program to achieve critical, equitable climate solutions, as directed by Section 208 of Executive Order 14008, Tackling the Climate Crisis at Home and Abroad. These supporter comments and recommendations elevated multiple common themes that we wanted to call to your attention.

First, the urgent recognition that:

1. Climate change is one of the most universal environmental and social justice issues of our time.
2. Public lands and waters provide an immediate opportunity for the federal government to act on climate change.

3. The current federal leasing and permitting program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water.
4. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step towards fixing and aligning the current program with the administration's climate, public health and equity goals.

Second, consensus of the need to prioritize the following as you start the review process of the federal leasing system:

1. Strong, meaningful tribal consultation and commitment to tribes' treaty rights;
2. Robust and inclusive public input opportunities now and following the DOI's interim report;
3. Creating a plan for achieving pollution-free public lands and waters – starting by making them a net-zero source of emissions by 2030 – by overhauling outdated leasing and land management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and
4. Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels, and the communities that continuously suffer the greatest impact of fossil fuel pollution.

Fossil fuel companies have had oversized influence on public lands management for far too long. That must change. A diversity of people must be involved in determining what approaches the country takes to making public lands benefit all of us and our climate, especially those communities who will be most impacted by the decisions.

Thank you for the opportunity to weigh in and for continuing to prioritize having the right voices at the table throughout your review.

Kim Stevens

Campaign Manager

The Wilderness Society | The Wilderness Society Action Fund

ph 720.647.9524 | cell 313.801.3676

Pronouns (she/her/hers)

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From: [Katie McKee](#)
To: [Energy Review](#)
Subject: [EXTERNAL] A letter from LIONBERGER regarding oil and gas leasing
Date: Monday, April 12, 2021 5:23:56 PM
Attachments: [image001.png](#)
[LIONBERGER Letter to Department of Interior-NOIA.pdf](#)

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Please see attachment for a letter from the Founder and Principal of Lionberger regarding the call to cease new oil and gas leasing in the US. Our company's existence is dependent on our clients that service this industry.

Thank you for taking the time to review our position.

Kind regards,



KATIE McKEE
Business Operations Manager
LIONBERGER, LLC
c. 713-922-1698 o. 832-819-1261
e. katie@lionbergercorp.com
w. www.lionbergercorp.com

From: [Erik Murdock](#)
To: [Energy Review](#)
Subject: [EXTERNAL] Access Fund Comments to Department of Interior Comprehensive Review of the Federal Onshore Oil and Gas Program
Date: Thursday, April 15, 2021 2:45:53 PM
Attachments: [Access Fund comments to DOI Programmatic O&G review 20200415.pdf](#)

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Please find the attached comments:
"Access Fund Comments to Department of Interior Comprehensive Review of the Federal Onshore Oil and Gas Program"

Thanks,

Erik Murdock, PhD

Policy Director | [Access Fund](#)

GIS Lab Founder | [Outdoor Alliance](#)

direct [720-588-3512](#) | main [303-545-6772](#)

[Facebook](#) | [Instagram](#) | [Twitter](#)

From: [Buccino, Sharon](#)
To: [Energy Review](#)
Cc: [Sanchez, Alexandra L](#); [Sanchez, Diane](#)
Subject: [EXTERNAL] Buccino Testimony Exhibits - Part One
Date: Thursday, March 25, 2021 10:38:19 PM
Attachments: [Buccino, Sharon, et al. - Scoping Comments on the Programmatic Environmental Impact Statement on Federal Coal Leasing.pdf](#)
[Eisenburg, Jacob & Alex Adams - Offshore Drilling - Putting The Nation's Coastline At Risk.pdf](#)
[Environmental Entrepreneurs - Clean Jobs America 2020- Repowering America's Economy in The Wake Of Covid-19.pdf](#)
[Environmental Entrepreneurs - Offshore Wind Generating Economic Benefits On The East Coast.pdf](#)
[Erickson, P. & Lazarus M. - How would phasing out US federal leases for fossil fuel extraction affect CO2 emissions and 2C goals.pdf](#)

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SHARON BUCCINO
*Senior Director, Lands
Nature Program*

NATURAL RESOURCES
DEFENSE COUNCIL
1152 15TH ST NW
WASHINGTON, DC 20005
T 202-289-6868
F 202-289-1060
[NRDC.ORG](#)

Please save paper.
Think before printing.

From: [Buccino, Sharon](#)
To: [Energy Review](#)
Cc: [Sanchez, Alexandra L](#); [Sanchez, Diane](#)
Subject: [EXTERNAL] Buccino Testimony GAO Reports
Date: Thursday, March 25, 2021 10:57:43 PM
Attachments: [GAO - Coal Leasing - BLM Could Enhance Appraisal Process, More Explicitly Consider Coal Exports, and Provide More Public Information.pdf](#)
[GAO - Federal Energy Development - Challenges to Ensuring a Fair Return for Federal Energy Resources.pdf](#)
[GAO - Federal Oil and Gas Revenue - Actions Needed to Improve BLM's Royalty Relief Policy.pdf](#)
[GAO - Oil and Gas - Onshore Competitive and Noncompetitive Lease Revenues \(1\).pdf](#)
[GAO - Oil and Gas - Onshore Competitive and Noncompetitive Lease Revenues.pdf](#)
[GAO - Oil and Gas Development - Actions Needed to Improve Oversight of the Inspection and Enforcement Program.pdf](#)
[GAO - Oil and Gas Lease Management - BLM Could Improve Oversight of Lease Suspensions with Better Data and Monitoring Procedures.pdf](#)
[GAO - Oil, Gas, And Coal Royalties - Raising Federal Rates Could Decrease Production on Federal Lands but Increase Federal Revenue.pdf](#)

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SHARON BUCCINO
*Senior Director, Lands
Nature Program*

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T 202-289-6868
F 202-289-1060
[NRDC.ORG](#)

Please save paper.
Think before printing.

From: [Tom Kies](#)
To: [Energy Review](#)
Subject: [EXTERNAL] Business Alliance for Protecting the Atlantic Coast, Oil & Gas Leasing Review Comment Letter
Date: Thursday, April 15, 2021 10:30:40 AM
Attachments: [Atlantic Business Alliance DOI Forum Comment Letter \(002\).docx](#)

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Hello,

The Business Alliance for Protecting the Atlantic Coast (BAPAC) is the leading business organization working to ensure the long term health and economic vitality of the Atlantic seaboard through responsible stewardship of the coastal and ocean waters. We represent over 42,000 businesses and 500,000 commercial fishing families united in opposition to expanded offshore oil and gas drilling in the Atlantic.

Thank you for taking our input as you prepare your review of the federal oil and gas leasing program, and we hope you consider the extreme threat offshore oil and gas drilling poses to our membership up and down the Atlantic Coast. Please find our full comments attached, and we look forward to the administration's further action.

Best regards,
Tom Kies, President, Business Alliance for Protecting the Atlantic Coast

Tom Kies
President, Business Alliance for Protecting the Atlantic Coast

Carteret County Chamber of Commerce
801 Arendell St., Suite 1
Morehead City, NC 28557
Phone: (252) 726-6350
e-mail: tom@nccoastchamber.com

Find us on Facebook



From: [Vipe Desai](#)
To: [Energy Review](#)
Subject: [EXTERNAL] Business Alliance for Protecting the Pacific Coast, Oil & Gas Leasing Review Comment Letter
Date: Wednesday, April 14, 2021 7:38:51 PM
Attachments: [BAPPC DOI Forum Comment Letter 2021.docx](#)
[ATT00001.htm](#)

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Hello,

On behalf of the Business Alliance for Protecting the Pacific Coast (BAPPC) – which represents over 7,500 businesses working together to protect our communities from new and expanded oil and gas development off the Pacific coast – thank you for the opportunity to provide comments on our nation’s oil and gas leasing program. Our alliance works to ensure the long-term health and vitality of our Pacific coast economy through responsible stewardship of our coastal and ocean waters, and we understand that our lives and livelihoods depend on clean, oil-free beaches.

Please find our full comments attached, and we look forward to the administration’s further action.

Best regards,
Vipe Desai
Founding Member, Business Alliance for Protecting the Pacific Coast

From: [Jenny Rowland](#)
To: [Energy Review](#)
Subject: [EXTERNAL] CAP comments on federal oil and gas review
Date: Wednesday, April 14, 2021 12:27:19 PM
Attachments: [CAP comments oil and gas review.docx](#)

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U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

April 14, 2021

RE: Federal oil and gas reform

To Whom It May Concern:

The federal oil and gas program is broken, plain and simple. For decades, oil and gas CEOs have made millions while ripping off taxpayers, sidelining local communities and tribes, and polluting our public lands. The Biden administration has an opportunity to meaningfully fix the leasing system for the first time in nearly four decades to ensure it works for the public, provides a fair return for the taxpayers who own our public lands, and incorporates the nation's conservation and climate goals.

Fortunately, there are many solutions for the administration and Congress to implement. Generally, CAP supports a full programmatic review of the federal oil and gas program. This should include taking climate and conservation goals into consideration, assessing revenues, considering environmental justice, and determining areas of the program that are vulnerable to fraud and abuse, in order to introduce more transparency, oversight, and accountability. Specifically, we recommend the following actions:

- Congress should end the noncompetitive leasing program. The costs to taxpayers and the agency far outweigh any benefits that come from providing the oil and gas industry around-the-clock, cheap access to America's public lands. Short of eliminating noncompetitive leasing altogether, BLM should increase leasing and rental rates for non-competitive leases and release a quarterly report on noncompetitive oil and gas leasing with details including where and when parcels were leased and by whom.
- BLM should conduct rulemakings to reform revenue policy to ensure that taxpayers are fairly compensated, companies are held responsible for paying for cleaning up after themselves,

and take into account effects on the climate. Congress should also address revenue in legislation.

- Royalties. The current onshore royalty floor of 12.5 percent is unacceptable and not in line with the market, offshore rates, or the royalty rates charged by state and private landowners. BLM should conduct a new rule making that sets a floor of at least 18.75 percent for the royalty rate, while allowing the secretary of the Interior the discretion to raise the rate in response to market conditions, without further rulemaking. The secretary can then increase rates based on either oil and natural gas prices or the location of known resources where the rate might increase in an area of known production versus an area that is more speculative.
- Rents. The current rental rates of \$1.50 per acre for the first five years of a lease, and \$2 per acre thereafter are too low and should be increased. Companies are largely willing to shell out the nominal rental fee because the benefits to doing so—in the form of increased reserves and market value—outweigh the annual cost to hold on to undeveloped land. As one example for reform, in Texas, during the first two years of a lease, the rental rate is \$5 per acre. In the third year of the lease, that rate jumps to \$2,500 per acre to incentivize drilling or turning the lease back over to the citizens of Texas.
- Bonding. BLM should update current rules to set bonding requirements based on the number of wells that would need to be reclaimed and requirements should be based on realistic reclamation and clean up costs.
- Bonus bids. The current minimum bonus bid of \$2 per acre is far too low and should be significantly increased to take into account the effect of oil and gas activity on the climate and other externalities.
- The administration must fully consider the costs of any further leasing on federal lands in a programmatic review given the ongoing climate and conservation crises. If leasing does return, there are many policies BLM and Congress could pursue to increase transparency, accountability, and taxpayer fairness to the leasing program:
 - BLM should ban anonymous nominations of parcels for lease across the oil and gas leasing program.
 - The BLM should assess fees to recoup costs of running the program. This could include a meaningful filing fee for an expression of interest, instead of allowing anyone to nominate a parcel for free. These administrative fees would help deter casual speculators and shift some of the costs of administering lease sales to the oil and gas industry, instead of taxpayers.
 - BLM should implement a bidder prequalification requirement and punish repeated bad actors. Under the current system, companies that routinely fail to pay rent are welcome to lease additional public lands. The BLM should implement a requirement that in order to lease more public land, a company must comply with the terms of its existing leases, including rental payments.
 - BLM should prioritize leasing in high-potential areas that have a reasonable expectation of producing economically viable products. In prioritizing certain areas for leasing, BLM could also ensure no additional leases are sold in areas with Indigenous sacred sites, critical wildlife corridors, and other areas that conflict with oil and gas development.
- BLM should improve data collection and transparency, including tracking the costs associated

with administering a lease. A more transparent oil and gas leasing system on public lands would benefit taxpayers and ensure that the government is serving as an accountable and responsible steward of the public's resources.

- Congress should address the potential impact to states from the long-term decline of fossil fuel activity and revenues on public lands due to the global shift away from fossil fuels. Congress must offer an opportunity for energy-producing states to separate their budgets from an industry in decline in order to build back better with sustainable and diverse economies. To do so, Congress must extricate state budgets from unsustainable and unpredictable fossil fuel markets by ending revenue sharing and decoupling fossil fuel energy production on federal lands and waters. At the same time, there must be enhanced investments in energy producing states and rural communities and an equitable transition for the workers, communities, and states that will pay the price for the oil and gas industry's legacy of pollution, financial recklessness, and insufficient investment.

For additional information on the need to reform the federal oil and gas leasing program, including more on the above policy changes, please see the following reports:

- [Backroom Deals](#)
- [Federal Oil and Gas Royalty and Revenue Reform](#)
- [Oil and Gas Companies Gain by Stockpiling America's Federal Land](#)
- [The Trump Administration Is Selling Your Public Lands on the Internet](#)
- [How Congress Can Help Energy States Weather the Oil Bust During the Coronavirus Pandemic](#)

This review is long overdue and we applaud the administration for starting this crucial process.

Thank you,

Jenny Rowland-Shea
Deputy Director, Public Lands
Center for American Progress

Jenny Rowland-Shea
Deputy Director, Public Lands
Center for American Progress
505-310-5923
she/her

From: [Kristi Parrott](#)
To: [Energy Review](#)
Subject: [EXTERNAL] CEA Comment on O&G Leasing
Date: Thursday, April 15, 2021 10:41:46 PM
Attachments: [Consumer Energy Alliance Comment on DOI Leasing Review.pdf](#)

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Consumer Energy Alliance is pleased to submit a comment on the oil and gas leasing program. The comment is attached. Thank you.

Kind Regards,

Kristi Parrott

Research & Policy Manager

HBW Resources LLC

1401 New York Ave NW | Washington, DC 20005

O: 202-429-3785 | C: 713-320-9253

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From: [Cassie Ratliff](#)
To: [Energy Review](#)
Subject: [EXTERNAL] Comment for DOI Interim Report Regarding Oil and Gas Program
Date: Thursday, April 15, 2021 6:40:46 PM
Attachments: [CVSC DOI Oil & Gas Program Review Comment \[4_15_21\].pdf](#)

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Department of Interior Staff,

Please accept the comment below (and attached) on behalf of Conservation Voters of South Carolina regarding the Department's interim report on the federal oil and gas leasing program.

April 15th, 2021

The Honorable Deb Haaland
Secretary
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240
Submitted via email to energyreview@ios.doi.gov

Re: Department of Interior Interim Report Regarding Oil and Gas Program

Dear Secretary Haaland,

On behalf of our members and supporters, we thank you for pausing all new offshore oil and gas leasing and conducting a thorough review of the broken oil and gas leasing system. This review process is an important step toward protecting our coastal communities from the threats of dirty and dangerous offshore drilling.

Now, we call on the Department of Interior to reform our country's oil and gas leasing system and chart a new path forward so that our public lands, coasts, and waters work for all people and local communities, not just the oil and gas companies. We ask you to consider:

- prioritizing environmental protection over issuing new leases and permits,
- appropriately siting renewable energy and encouraging energy efficiency to offset the need for additional fossil fuel development; and
- permanently protecting lands and waters that are of economic, cultural, and ecological significance to the communities that surround them.

We also urge the Administration and Congress to permanently protect South Carolina's coast - and the families and businesses that depend on it - from offshore drilling once and for all.

Attempts to open our nation's coastlines have repeatedly been met with overwhelming bipartisan opposition from over 2,300 local, state, and federal officials, including South Carolina Governor Henry McMaster and more than 380 municipalities, which include the 26 coastal communities in South Carolina who have spoken out against it. This opposition to drilling runs along the entire Atlantic Coast, with an alliance representing over 46,000 businesses and 500,000 fishing families from Maine to Florida who all strongly oppose oil exploration and development off the East Coast.

South Carolina in particular is at a uniquely high risk, with the 4th longest coastline along the Atlantic and home to over 500,000 acres of salt marsh, the most of any state on our coast. Offshore drilling would decimate our tourism and outdoor recreation economies that generate over \$20 billion in revenue and support more than 150,000 jobs across our great state. Visitors come from all over the world to experience all that South Carolina has to offer and drilling simply isn't worth the risk to our economy and environment.

Offshore drilling would also threaten our state's fisheries and the local communities who depend on them for their livelihood and subsistence fishing, such as the Gullah Geechee. A spill like BP's Deepwater Horizon in 2010 in the Gulf would cause irreparable damage to South Carolina's coastal and Sea Island communities and the natural resources upon which they depend. Even worse, drilling advocates often tout the development of onshore infrastructure and refineries in marginalized communities, who already bear the disproportionate impacts of climate change and pollution.

In conclusion, offshore oil and gas drilling threatens everything that's special about South Carolina and the natural resources that our communities rely on for our culture,

economy, and way of life. From our marshes, beaches, rivers, and creeks to our critical fisheries and native wildlife like sea turtles and the endangered North Atlantic right whale. Halting offshore drilling protects ocean health and coastal habitats by reducing pollution and the effects of climate change - while permanent protections will prevent billions in future damages to people, property, and our environment.

Sincerely,



John Tynan
Executive Director
Conservation Voters of South Carolina
712 Richland St, Suite A
Columbia, SC 29201
Phone: 803-799-0716
www.cvsc.org

With gratitude,

Cassie Ratliff
Land, Water, and Ocean Project Manager
Conservation Voters of South Carolina
(248) 762-6014
Cassie@cvsc.org
www.cvsc.org

From: [Jamie Church](#)
To: [Energy Review](#)
Subject: [EXTERNAL] Farmington Chamber of Commerce Comments re: Interior's Interim Report
Date: Tuesday, April 13, 2021 12:46:46 PM
Attachments: [Farmington Comments.pdf](#)

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Attn: Secretary Debra Haaland
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

April 12, 2021

Dear Secretary Haaland,

I am writing on behalf of the Farmington Chamber of Commerce to request you intervene on behalf of our community and the great state of New Mexico in your capacity as Interior Secretary. Recent actions by the administration indefinitely banning new oil and natural gas leases on federal lands and placing a 60-day moratorium on permitting jeopardize the jobs, revenue and community resources we depend on to survive. As a New Mexican yourself, we believe your voice would serve as a powerful defense of working New Mexicans all across the state, but especially here in northwest New Mexico.

We represent a diverse, broad-based group of industries, businesses and everyday New Mexicans who believe these actions are in direct contrast to the fiscal interests of our state. An energy ban disregards the importance of the energy industry to our community, our state and our nation, and is tone deaf to the economic destruction from the COVID-19 pandemic from which we are still trying to recover.

This ban will not only harm the oil and gas industry in the region - one of our top employers - but also our local restaurants, shops, and other businesses who rely on the patronage of oil and gas workers for their day-to-day commerce. Every sector, from construction to retail, will be affected.

And following the announcement of the planned closure of the San Juan Generating Station, our community has been dealt a one-two punch. Together, the closure of the power plant - and the subsequent loss of tax revenue that pays for a near endless list of public services here - and the indefinite ban on new oil and gas leases on federal lands would deliver an unsustainable future for our community.

In the past decade alone, nearly 10 percent of the Farmington population has moved away. Without the enticement of job security or revenue to bolster our region's education and infrastructure, we fear this number will increase - not because our residents did anything wrong, but because of what the government has decided is ironically in our "best interest."

But beyond Farmington, revenue from lease sales in the Northwest corner of the state is shared throughout New Mexico - funding essential public services like infrastructure, hospitals and schools. If the oil and natural gas industry leaves New Mexico for more business-friendly states, we will be left with a massive funding deficit, which means fewer services or higher taxes on New Mexico families - or both.

Just last year, the industry contributed nearly \$3 billion to our state's General Fund. And without this, we fear our schools and hospitals will bear the brunt of the funding gap.

Currently, tens of thousands of oil and gas workers stand to lose their jobs with no immediate or near-term means for us to replace these good-paying jobs. However, over the long-term, the uncertainty created by the ban will impact every New Mexican - not just those living in oil-producing communities.

Secretary Haaland, as a New Mexican, you have been a vocal advocate for our state your entire career. We ask you please speak up again now: New Mexico simply cannot sustain an energy ban.

Sincerely,

Jamie Church
President/CEO
Farmington Chamber of Commerce

Sent from [Mail](#) for Windows 10

From: [Ricardo Hurtado](#)
To: [Energy Review](#)
Subject: [EXTERNAL]
Date: Thursday, April 15, 2021 11:18:04 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[RH_Letter to Interior.pdf](#)

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April 15, 2021

The Honorable Deb Haaland
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Haaland:

I want to thank you for the opportunity to contribute to the Department of Interior's interim report on Interior's federal leasing program and weigh in during the comment period. My organization, the National Association of Hispanic Publications (NAHP) Media, is a non-partisan trade advocacy organization representing the leading Spanish language publications serving 41 markets in 39 states, the District of Columbia and Puerto Rico, with a combined circulation of over 23 million. Our organization's network of Spanish language news publications spans the country, with a concentration in areas of large Hispanic populations including New Mexico, Colorado, and Texas. Coverage on climate change and energy is an area of significant attention among our readership, and one where our publishers have demonstrated a growing editorial interest. In addition, our readers are both major consumers and workers in the energy and electricity sectors. I wish to weigh in on Department of Interior's federal leasing program in light of this perspective.

I want to applaud the Biden administration for your commitment to combating climate change and setting forth bold environmental goals. However, I would be remiss if I did not highlight how federal leasing actually is beneficial to the environment in several ways. As a result of the United States moving away from coal, our country has made the most progress of any major economy in reducing its carbon footprint, according to the United Nations Emissions Gap Report 2020.

Much of our country's progress due to the result of cleaner burning natural gas for use in electricity

generation, which resulted in 57% more emissions reductions versus renewables from 2005-2018. President Biden's federal leasing ban could reverse decades of environmental progress as national CO2 emissions in the power sector could increase by an average of 5.5% by 2030 if such a policy goes into effect.

Another concern of mine is the impact the federal leasing ban will have on tax revenue for public education in states like New Mexico, which has a significant Hispanic population. The oil and gas industry has provided New Mexico \$1.37 billion dollars for public education, accounting for over one third of their education budget. If this revenue is lost, it will have devastating effects on the students, teachers, curriculums, and Hispanic communities around the state. It is not clear how this revenue could be recovered, other than heavily taxing residents, which would not be a welcome solution.

While I appreciate the Biden administration's dedication to confronting our country's climate challenges, I believe a federal leasing ban is not the way to accomplish these goals, and thus should be reconsidered.

Sincerely

Ricardo Hurtado

- Hispanic Media, LLC, CEO
- NAHP Media, LLC, Chair

www.elsoln1.com

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Philadelphia, PA 19120

Phone: 215-424-1200 | Fax: 215-424-6064 | Email: rhurtado@elsoln1.com

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From: [Knodel, Marissa S](#)
To: [Energy Review](#)
Subject: Fw: [EXTERNAL] Courtesy Copy: Coalition Comments on DOI Fossil Fuels Review
Date: Thursday, May 6, 2021 9:32:36 AM
Attachments: [2021_04_12 CPANP comments on DOI O&G Reform.pdf](#)

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

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Thursday, May 6, 2021 9:07 AM
To: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: Fw: [EXTERNAL] Courtesy Copy: Coalition Comments on DOI Fossil Fuels Review

Found this in my junk email this morning! I hope and expect they also sent via the appropriate email to our comment inbox?

From: Emily Thompson <Emily_Thompson@protectnps.org>
Sent: Monday, April 12, 2021 12:51 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Estenoz, Shannon A <shannon_estenoz@ios.doi.gov>; Benge, Shawn T <Shawn_Benge@nps.gov>
Subject: [EXTERNAL] Courtesy Copy: Coalition Comments on DOI Fossil Fuels Review

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Hello,

Please see a copy of the comments we submitted for the DOI Fossil Fuels Program Review. Let us know if you have any questions or would like to discuss further.

Emily Thompson

~~~~~

Emily Thompson  
Associate Director of Engagement  
Coalition to Protect America's National Parks

**From:** [Alonso, Shantha R](#)  
**To:** [Energy Review](#)  
**Subject:** Fw: [EXTERNAL] Re: Additional Information for Interim Report Re: Review of Pause to New Oil and Gas Leasing // The Mountain Pact  
**Date:** Friday, April 16, 2021 3:51:49 PM  
**Attachments:** [Mountain Pact Header.png](#)  
[anna signature.png](#)  
[Town of Leavenworth, WA Oil and Gas Pause Resolution April 2021.pdf](#)

---

Shantha Ready Alonso (*she/her*)  
Director, Office of Intergovernmental and External Affairs (OIEA)  
Office of the Secretary, U.S. Department of the Interior

---

**From:** Anna Peterson <[anna@themountainpact.org](mailto:anna@themountainpact.org)>  
**Sent:** Friday, April 16, 2021 2:59 PM  
**To:** Alonso, Shantha R <[shantha\\_alonso@ios.doi.gov](mailto:shantha_alonso@ios.doi.gov)>  
**Subject:** [EXTERNAL] Re: Additional Information for Interim Report Re: Review of Pause to New Oil and Gas Leasing // The Mountain Pact

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Also attached is a resolution supporting the pause from the Town of Leavenworth, Washington.

Thank you,  
Anna

On Thu, Apr 15, 2021 at 5:45 PM Anna Peterson <[anna@themountainpact.org](mailto:anna@themountainpact.org)> wrote:  
FYI

----- Forwarded message -----

**From:** Anna Peterson <[anna@themountainpact.org](mailto:anna@themountainpact.org)>  
**Date:** Thu, Apr 15, 2021 at 5:45 PM  
**Subject:** Additional Information for Interim Report Re: Review of Pause to New Oil and Gas Leasing // The Mountain Pact  
**To:** <[energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)>

Hello,

Please see attached and below for additional information from The Mountain Pact to help inform your report regarding The Department of Interior's review of the pause to new oil and gas leasing on federal public lands.

Note that there are other Mountain Pact communities with similar resolutions on their upcoming town/city council or county commission agendas. I will submit those as soon as I have them.

Please let me know if I can get you any more information.

Thank you,  
Anna



April 15, 2021

SUBMITTED VIA E-MAIL: [energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)

The Honorable Deb Haaland Secretary of the Interior 1849 C Street Washington, D.C. 20240

Dear Secretary Haaland:

The Mountain Pact is an organization that works with local elected officials in over 80 mountain communities across the west with outdoor recreation-based economies to speak with a collective voice on federal climate, public lands, and outdoor recreation policy. Thank you for the opportunity to provide recommendations to the Interior Department as it reviews the federal onshore oil and gas program.

We strongly support the administration's decision to pause the program to provide the department time for a thorough review. Many of the communities in the Mountain Pact network have recently passed resolutions in support of President Biden's [pause on new oil and gas leasing on federal public lands](#). ***See attached resolutions from Santa Fe County, New Mexico, as well as the Town of Basalt and the Town of Ridgway, Colorado.***

As the resolutions state, "Our vast network of federal public lands offer abundant natural beauty and a wealth of natural resources, a vital economic engine for local communities, and provide a unique quality of life for residents of communities adjacent to them. It's critical that our public lands and waters are managed responsibly and sustainably so they can remain open and accessible to present and future generations."

The Mountain Pact works with local elected leaders who have a strong responsibility to take and support prudent and pragmatic steps to reverse climate change and mitigate its devastating impacts by reducing the amount of greenhouse gases and other forms of pollution that contribute to climate change. [One-quarter of the country's greenhouse gas emissions come from the development of fossil fuels on public lands](#). Western mountain communities bear the brunt of climate impacts from severe heat and drought, which are making wildfires more frequent and extreme; an increase in emissions of methane, a powerful greenhouse gas emitted on our public lands; extremes in precipitation; and dust on snow, which causes snowfall to evaporate prematurely. Additionally, in [2018 pollution caused by the burning of fossil fuels caused 8.7 million or one in five deaths globally](#) - we must take bold climate action now.

Our federal public lands should be managed to ensure that the companies extracting natural resources provide a fair return to federal and state taxpayers and also protect the environment and wildlife and their habitat, and provide the opportunity for the development of sustainable economic non-extractive activity such as outdoor recreation.

In addition to supporting the oil and gas leasing pause, the resolutions also ask the Biden administration to “modernize the federal oil and gas leasing program to ensure the oil and gas companies that hold leases and extract natural resources provide a fair return to federal and state taxpayers and develop a plan to phase out the production of fossil fuels, which are a major contributor to climate change, in a way that also supports the workers, communities, and states that currently have fossil fuel-dependent economies.”

We support the legal requirement that our federal lands be managed under the ‘multiple use’ standard to best meet the present and future needs of the American people and believe that the federal land management policies should be developed with input from local communities and public land users, and incorporate the best available science.

By pausing the federal oil and gas leasing for the first time in 40 years, the Biden administration has rightly recognized that it is fundamentally broken and must be overhauled to address the climate crisis, generate a fair return for taxpayers, respect local landowners, and support communities in their inevitable transition away from fossil fuels.

Thank you,



Anna Peterson, Executive Director The Mountain Pact

--



**ANNA PETERSON**

Executive Director | The Mountain Pact

Durango, Colorado | (612) 735-2402 | [anna@themountainpact.org](mailto:anna@themountainpact.org)

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*Founded in 2014, [The Mountain Pact](#) mobilizes local elected officials in over 80 Western mountain communities with outdoor recreation based economies to speak with a collective voice on federal climate, public lands, and outdoor recreation policy.*

**From:** [Logan Glasenapp](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] New Mexico Wild Federal Oil and Gas Program Review Letter  
**Date:** Friday, April 16, 2021 1:22:21 AM  
**Attachments:** [image001.png](#)  
[New Mexico Wild Federal Oil and Gas Program Letter.pdf](#)

---

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Please see attached.

Thank you,

Logan

signature\_296493573



**From:** [Kevin Bruce](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments re: DOI Virtual Forum  
**Date:** Thursday, April 15, 2021 11:27:37 PM  
**Attachments:** [2021.04.15 Gulf Energy Alliance Comment Letter - DOI Virtual Forum.pdf](#)

---

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Please see the attached comments in response to the additional information solicited in response to the Department of Interior's virtual forum of March 25, 2021.

**From:** [Louis Geltman](#)  
**To:** [Energy Review](#)  
**Cc:** [Adam Cramer](#)  
**Subject:** [EXTERNAL] Outdoor Alliance energy review comments  
**Date:** Thursday, April 15, 2021 10:30:23 PM  
**Attachments:** [OA Energy Review Comment.pdf](#)

---

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Please find the comments of Outdoor Alliance attached.

Louis Geltman

--

Louis Geltman  
Policy Director | Outdoor Alliance  
P.O. Box 2495  
White Salmon, WA 98672  
301.928.7789

[www.outdooralliance.org](http://www.outdooralliance.org)

**From:** [Antoine Halff](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Submission to the Oil and Gas Program discussion  
**Date:** Thursday, April 15, 2021 9:51:24 PM  
**Attachments:** [Kayrros Insight - Assessing the Potential Impacts of a Long-Term Leasing Moratorium on Federal Lands - OT, subscribers.pdf](#)

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Regarding the comprehensive review of oil and gas permitting and leasing practices across Federal lands and offshore waters, I would like to respectfully submit the following observations:

- The U.S. oil and natural gas industry is a major emitter of methane, a powerful greenhouse gas whose warming potential is more 80 times that of carbon dioxide in the first 20 years.
- Oil and gas producers operating on federal lands are no exception, but neither are they the worst offenders. In fact, detections derived from satellite imaging show that the methane intensity of Permian basin operators is somewhat lower on federal lands than on private lands. Thus, in the Permian Basin, producers operating on federal lands accounted for 9-11% of total basin production in 2019-2020, but “only” 7.2%-8% of upstream methane emissions, according to Kayrros data.
- In general, eliminating large methane emissions from oil and gas operations has been identified as necessary to help avert the most catastrophic effects of climate change. Cost-effective means to rapidly reduce and even eliminate these emissions have recently become available.
- The Department of the Interior has the opportunity to use its leasing and permitting authority to incentivize methane abatement from oil and gas operators on federal lands.
- While the optimal choice of policy tools remains to be ascertained, available options run the gamut from indexing royalty rates to the methane footprint of oil and natural gas produced on federal lands, to setting methane-specific conditions to permits and leases.
- Past U.S. methane abatement policies have been ineffective at reducing emissions from oil and gas, in part because regulators and operators alike lacked the right tools to detect methane emissions from oil and gas operations, let alone measure them, attribute them to their sources and eliminate them.
- In the last few years, a proliferation of new technologies has emerged to track

methane emissions from oil and gas operations. These include new commercially available tools that use artificial intelligence to process input from multiple satellites and continuously track large emissions from US onshore operations. Combining geospatial intelligence and local sensors can let operators optimize their abatement efforts and dramatically reduce methane monitoring, and abatement expenditures.

- The BLM should support the establishment of a robust methane surveillance system leveraging the full potential of state-of-art geospatial and digital technologies, whether within the BLM itself and/or by private-sector operators.
- Eliminating methane emissions from oil and gas produced on federal lands will not only be good for the climate but will help maintain both the license to operate of local producers and the competitiveness of their oil and gas products in international markets.
- On the other hand, ending oil and gas leasing and permitting on federal lands, while it might help avert some local pollution, would do virtually nothing to mitigate the global warming impact of U.S. oil and gas production. Instead, producers would simply move elsewhere, whether to new leases on state or private U.S. lands or beyond the U.S.
- Furthermore, ending oil and gas leasing and permitting on federal lands would disproportionately and negatively affect a handful of fossil-fuel producing states whose economies heavily depend on oil and gas activity, namely New Mexico and Wyoming, followed by Colorado and North Dakota.
- By ending oil and gas leasing and permitting on federal lands, the BLM who effectively relinquish its regulatory authority on federal leaseholders. It should instead leverage that authority to incentivize responsible performance and good stewardship from oil and gas operators and help them set the best possible operational standards for the nation and indeed the world.

Attached please find a note providing additional information that you may find of interest.

Sincerely,

Antoine Halff

Senior Adjunct Research Scholar, Center on Global Energy Policy, Columbia University

Founding Partner and Chief Analyst, Kayrros

**From:** [Crowther, John J \(DNR\)](#)  
**To:** [Energy Review](#)  
**Cc:** [David J Fauske](#); [scott.szmyd@north-slope.org](mailto:scott.szmyd@north-slope.org); [Feige, Corri A \(DNR\)](#); [Longan, Sara W \(DNR\)](#); [Goodrum, Brent W \(DNR\)](#); [Ryckman, MaryKay \(DNR\)](#); [Spielman, Ashley S \(DNR\)](#); [Knudson, Kip C \(GOV\)](#)  
**Subject:** [EXTERNAL] State of Alaska and North Slope Borough Energy Review Comments  
**Date:** Thursday, April 15, 2021 9:01:14 PM  
**Attachments:** [04 15 21 FINAL Signed - SOA NSB Comments - Federal Oil and Gas Program.pdf](#)  
[MOU between BOEM and Alaska.pdf](#)

---

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Attached are comments and a referenced attachment from the North Slope Borough and State of Alaska in response to the request for comment and information on the Department's review of the federal oil and gas program pursuant to Executive Order 14008.

Best,

John Crowther  
Alaska Department of Natural Resources

**From:** [David J Fauske](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] North Slope Borough Alaska  
**Date:** Thursday, April 15, 2021 8:58:24 PM  
**Attachments:** [4749\\_001.pdf](#)

---

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**From:** [Kelly Fuller](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Submission for DOI's oil & gas program review  
**Date:** Thursday, April 15, 2021 8:49:16 PM  
**Attachments:** [WWP oil & gas review 4.15.21.pdf](#)  
[WWP Finn et al 2017.pdf](#)  
[WWP Shandro et al 2014.pdf](#)  
[WWP NIWRC 2017.pdf](#)  
[WWP Molvar Directional Drilling.pdf](#)  
[WWP Gibson et al 2017.pdf](#)  
[WWP MT Board of Crime Control 2015.pdf](#)

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Dear Department of the Interior staff:

We have attached a letter and six supporting documents for the Department of the Interior's review of its oil and gas program.

If you have any questions or problems opening the documents, please contact me per the information below.

Thank you for considering our input.

Sincerely yours,

--

Kelly Fuller  
Energy and Mining Campaign Director  
Western Watersheds Project  
[kfuller@westernwatersheds.org](mailto:kfuller@westernwatersheds.org) | (928) 322-8449  
she/her/hers

**From:** [Patrick Bergt](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments of the Alaska Oil and Gas Association  
**Date:** Thursday, April 15, 2021 9:59:11 PM  
**Attachments:** [AOGA Comments - Final Draft.pdf](#)

---

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To Whom it May Concern –

Attached are comments of the Alaska Oil and Gas Association to inform DOI's review of the federal oil and gas leasing program. Please let me know if you have any questions.

Thanks,

**Patrick N. Bergt**

Regulatory and Legal Affairs Manager  
Alaska Oil and Gas Association  
121 W. Fireweed Lane, Ste 207  
Anchorage, AK 99503  
D: 907.222.9604  
C: 907.917.9171  
[bergt@aoga.org](mailto:bergt@aoga.org)



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**From:** [Patrick Bergt](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments of the Alaska Oil and Gas Association  
**Date:** Thursday, April 15, 2021 8:36:03 PM  
**Attachments:** [AOGA Comments - Final Draft.pdf](#)

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To Whom it May Concern –

Attached are comments of the Alaska Oil and Gas Association to inform DOI's review of the federal oil and gas leasing program. Please let me know if you have any questions.

Thanks,

**Patrick N. Bergt**

Regulatory and Legal Affairs Manager  
Alaska Oil and Gas Association  
121 W. Fireweed Lane, Ste 207  
Anchorage, AK 99503  
D: 907.222.9604  
C: 907.917.9171  
[bergt@aoga.org](mailto:bergt@aoga.org)



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**From:** [Liz Lee](#)  
**To:** [Energy Review](#)  
**Cc:** [Julia Olson](#); [Susan Carey](#)  
**Subject:** [EXTERNAL] Comment for the Department of the Interior's Interim Report on the Federal Oil and Gas Program  
**Date:** Thursday, April 15, 2021 8:34:38 PM  
**Attachments:** [2021.04.15.OCT Comments DOI Federal Oil and Gas Program.pdf](#)

---

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Dear Secretary of Interior Deb Haaland,

On behalf of America's youth, Our Children's Trust provides these comments for the Department of the Interior's ("DOI") review of "Federal oil and gas permitting and leasing practices in light of the Secretary of the Interior's broad stewardship responsibilities over the public lands and in offshore waters, including potential climate and other impacts associated with oil and gas activities . . . ." Executive Order 14008, Sec. 208. As the Nation's only law firm dedicated to representing youth who are being harmed by their government's conduct that causes climate change, we write to advise DOI to align the federal oil and gas program with protecting the fundamental constitutional rights of children, particularly children within environmental justice communities, including communities of color, low-income communities, and indigenous communities.

Please find the attached comments. Let us know if you have any questions.

Sincerely,

Julia Olson  
Executive Director and Chief Legal Counsel  
Our Children's Trust  
[julia@ourchildrenstrust.org](mailto:julia@ourchildrenstrust.org)

--

**Liz Lee**  
Government Affairs Staff Attorney  
Based in the D.C. metro area  
she/her/hers  
(240) 731-3114  
[liz@ourchildrenstrust.org](mailto:liz@ourchildrenstrust.org)

***\*Join us in supporting the congressional Children's Fundamental Rights and Climate Recovery Resolution [here!](#)***

[Our Children's Trust](#)

P.O. Box 5181  
Eugene, OR 97405  
(541) 375-0158



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**From:** [Riki Ott](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Public comment to inform Dept. of Interior's interim report  
**Date:** Thursday, April 15, 2021 8:29:21 PM  
**Attachments:** [DOI Policy Recommendations\\_FINAL v415.pdf](#)

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Dear Interior Secretary Haaland,

I'm writing in response to your invitation to the public to submit additional information to inform the DOI's interim report on oil and gas development on public lands and waters. I am writing on behalf of myself, a survivor of the 1989 Exxon Valdez oil spill, and as the founder and current director of ALERT, a project of Earth Island Institute, a California-based nonprofit organization.

My attached comments are in the form of policy recommendations with a brief rationale for each of 10 framing issues. These recommendations are informed by over 30 years of volunteer work and direct experience in our nation's largest oil spills, including the *Exxon Valdez* oil spill, the BP Deepwater Horizon oil spill-disaster, and the 2010 Enbridge tar sands pipeline spill into the Kalamazoo River in Michigan, among other spills. I am an expert on human health effects of oil spill disasters and have had the privilege of serving as an expert for the United Haida Nation on matters related to the Enbridge Gateway Pipeline project and the Trans Mountain Pipeline project. All to say, my expertise is earned and community-based. My recommendations reflect the thoughts and suggestions of other individuals from oil-impacted communities.

I will also provide these policy recommendations at the official DOI/BOEM consultation on April 20 at the "Moving Beyond Petroleum in the Gulf Virtual Forum," hosted by Healthy Gulf.

Someday, I hope our paths cross in person.

Riki Ott, PhD (marine toxicology)  
Director, ALERT Project  
[www.alertproject.org](http://www.alertproject.org)

Earth Island Institute  
2150 Allston Way, #450  
Berkeley, CA 94704



**From:** [Simmons, Christopher](#)  
**To:** [Energy Review: drjackson@blm.gov](mailto:drjackson@blm.gov)  
**Subject:** [EXTERNAL] National Audubon Society- DOI Comprehensive O&G Review Comments  
**Date:** Thursday, April 15, 2021 8:21:21 PM  
**Attachments:** [National Audubon Society Comprehensive O&G Review Comments 04.15.2021.pdf](#)

---

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Dear Secretary Haaland,

Please accept and fully consider these comments regarding the Department of the Interior's comprehensive review of the federal oil and gas program as called for in Executive Order 14008 on behalf of National Audubon Society.

National Audubon Society is a national nonprofit conservation organization dedicated to protecting birds and the places they need, today and tomorrow, throughout the Americas using science, advocacy, education, and on-the-ground conservation. Audubon has advocated for birds and other wildlife on public lands for over 110 years. Audubon has over 1.9 million members nationwide, 23 state offices and 450+ local chapters.

Thank you again for the opportunity to provide these recommendations. We look forward to engaging with DOI as this important process moves forward.

Respectfully,

**Christopher Simmons**

Senior Manager, Public Lands Policy

**National Audubon Society**

1580 Lincoln Street, Suite 1280

Denver, CO 80203

[www.audubon.org](http://www.audubon.org)

**From:** [Scott Challburg](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] DOI Feedback - Federal Oil and Gas Program Virtual Forum  
**Date:** Thursday, April 15, 2021 8:13:29 PM  
**Attachments:** [image001.png](#)  
[DOI Feedback Letter - Beacon - 2021.04.15.pdf](#)

---

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To Whom it May Concern:

Please see attached feedback letter from Beacon.

Thank you,

**Scott Challburg**

Land Administration Manager  
Beacon Offshore Energy  
[schallburg@beaconoffshore.com](mailto:schallburg@beaconoffshore.com)  
3 Allen Center  
333 Clay St., Suite 4200  
Houston, Texas 77002  
C – 832-495-9437  
O – 346-867-0531



**From:** [Mary O'Hara](#)  
**To:** [Energy Review](#)  
**Cc:** [smashuda@earthjustice.org](mailto:smashuda@earthjustice.org); [bhardy@earthjustice.org](mailto:bhardy@earthjustice.org)  
**Subject:** [EXTERNAL] RE: Review of the Federal Fossil Fuel Programs in the Offshore Gulf of Mexico  
**Date:** Thursday, April 15, 2021 7:58:10 PM  
**Attachments:** [Earthjustice Oceans Interior Review Comments 4.15.21.pdf](#)

---

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As a follow up to the below email, please see attached revised letter correcting the date of the letter. Please replace the one sent previously with this corrected version.

Thank you,

Mary O'Hara  
Litigation Paralegal, Oceans Program  
W: 206.691.8752  
C: 206.661.6878  
(Pronouns: She/Her/Hers)

---

**From:** Mary O'Hara  
**Sent:** Thursday, April 15, 2021 4:46 PM  
**To:** [energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)  
**Cc:** Steve Mashuda ([smashuda@earthjustice.org](mailto:smashuda@earthjustice.org)) <[smashuda@earthjustice.org](mailto:smashuda@earthjustice.org)>; Brettney Hardy ([bhardy@earthjustice.org](mailto:bhardy@earthjustice.org)) <[bhardy@earthjustice.org](mailto:bhardy@earthjustice.org)>  
**Subject:** Review of the Federal Fossil Fuel Programs in the Offshore Gulf of Mexico

Please see attached comment letter for consideration as part of the Interior Department's ongoing programmatic review of the federal fossil fuel programs with respect to offshore. We would be happy to provide electronic copies of the references contained in this letter for convenience, upon request.

This letter is submitted on behalf of Earthjustice and the following groups:

Sierra Club  
Healthy Gulf  
Progress Florida  
San Antonio Bay Estuarine Waterkeeper  
Bayou City Waterkeeper  
Turtle Island Restoration Network

Suncoast Waterkeeper  
Operation HomeCare, Inc.  
Environmental Stewardship  
Center for Biological Diversity

Thank you,

Mary O'Hara  
Litigation Paralegal | Oceans Program  
(Pronouns: She/Her/Hers)

810 Third Ave., Suite 610  
Seattle, WA 98104  
W: 206.691.8752  
C: 206.661.6878  
[earthjustice.org](http://earthjustice.org)



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**From:** [David Wieland](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments from WORC re: DOI Interim Report  
**Date:** Thursday, April 15, 2021 7:34:12 PM  
**Attachments:** [4.15 DOI Petition from WORC.docx](#)  
[2021.04.15 WORC DOI Comments.docx](#)  
[2021.3 WORC Reclaiming Wells Addressing Climate Impacts \(1\).pdf](#)  
[Non-Responsive Operators PRBRC 2021 info.xlsx](#)

---

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Secretary of the Interior Debra Haaland  
U.S. Department of the Interior  
18<sup>th</sup> & C Streets, NW  
Washington, D.C. 20240

Transmitted by email to [energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)

Dear Madam Secretary:

Thank you for this opportunity to submit the attached comments for consideration in the federal oil and gas program review.

We wish you and your staff every success in accomplishing fundamental changes in the oil and gas program. Thank you for your leadership of this effort.

Sincerely,

David Wieland

Attachments:

Comment letter from WORC

Petition from WORC Members

"Reclaiming Wells and Addressing Climate Change: Policy Recommendations"

Non-Responsive Operators Powder River Basin

--

David Wieland | Regional Organizer | He/him

Western Organization of Resource Councils

220 S. 27<sup>th</sup> Street, Suite B | Billings, MT 59101 | C: 907-538-8755



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**From:** [Marleanna Hall](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comment letter: DOI Review of Federal Oil and Gas Leasing Program  
**Date:** Thursday, April 15, 2021 7:27:23 PM  
**Attachments:** [RDC comments on DOI Oil and Gas Leasing Program Review.pdf](#)

---

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Good afternoon:

Please find a letter attached in response to the Department of Interior's call for information on the federal oil and gas leasing program.

Thank you,  
Marleanna Hall  
Executive Director  
Resource Development Council for Alaska, Inc.

**From:** [Randall Luthi](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Governor Mark Gordon's Comments  
**Date:** Thursday, April 15, 2021 7:22:04 PM  
**Attachments:** [SecretaryHaalandFossilFuelReview4-15-21.pdf](#)

---

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Attached, please find Governor Gordon's comments on the fossil fuel review. Thank you for the opportunity to submit comments. Should you have any questions, do not hesitate to contact me or the Governor.



Office of the Governor  
State Capitol  
Cheyenne, WY 82002  
Office: 307 777-7520  
Cell: 307 214-2093

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**From:** [Alex Daue](#)  
**To:** [Energy Review](#)  
**Cc:** [Culver, Nada L](#); [Alonso, Shantha R](#); [Kelly, Katherine P](#)  
**Subject:** [EXTERNAL] TWS recommendations on the Interior Department's review of the federal oil and gas program (email 1)  
**Date:** Thursday, April 15, 2021 7:00:41 PM  
**Attachments:** [TWS Comprehensive Review Letter 4 15 21.pdf](#)

---

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Hello,

Please accept the attached comment letter on behalf of The Wilderness Society. Note that we are sending Appendices B-F in a separate email because of the large file size.

We appreciate the opportunity to comment.

Sincerely,

**Alex Daue (he/him/his)**  
Assistant Director, Energy & Climate  
**The Wilderness Society | The Wilderness Society Action Fund**  
ph 720-647-9369  
1660 Wynkoop St # 1150, Denver, CO 80202

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**From:** [Shannon Anderson](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Department of Interior's review of the federal oil and gas program  
**Date:** Thursday, April 15, 2021 7:16:13 PM  
**Attachments:** [PRBRC comments to DOI April 2021.docx.pdf](#)  
[Member comments to DOI April 2021.pdf](#)

---

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Please see the attached comments submitted from Powder River Basin Resource Council and our members. Thank you!

Shannon Anderson, Staff Attorney  
Powder River Basin Resource Council  
934 N. Main St., Sheridan, WY 82801  
(307) 672-5809 (o) (307) 763-0995 (c)  
[sanderson@powderriverbasin.org](mailto:sanderson@powderriverbasin.org)

**From:** [Miyoko Sakashita](#)  
**To:** [Energy Review](#)  
**Cc:** [Kristen Monsell](#)  
**Subject:** [EXTERNAL] Comments on Fossil Fuel Leasing Program Review  
**Date:** Thursday, April 15, 2021 6:53:54 PM  
**Attachments:** [2021-04-15 Federal Oil and Gas Leasing Pause \(Interior\).pdf](#)

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To whom it may concern:

Thank you for the opportunity to provide input on the federal fossil fuel leasing program. Please see the attached comments and supporting references (enclosed [here](#)) that focus on the Outer Continental Shelf oil and gas leasing program.

Sincerely,  
Miyoko

---

Miyoko Sakashita  
Oceans Director | Senior Counsel  
Center for Biological Diversity  
1212 Broadway, Suite 800  
Oakland, CA 94612  
tel. 510-844-7108 | [miyoko@biologicaldiversity.org](mailto:miyoko@biologicaldiversity.org)  
[@endangeredocean](#) | [Center for Biological Diversity](#)

**From:** [Andrew Hartsig](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Petition in support of regulatory reform for offshore oil and gas activities  
**Date:** Thursday, April 15, 2021 6:37:32 PM  
**Attachments:** [2021.04.15 Comprehensive Review Petition.pdf](#)

---

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Hello,

Attached please find a short letter, signed by roughly 1800 members and supporters of Ocean Conservancy, urging the Department of the Interior to fundamentally change regulations governing offshore oil and gas activities.

The people signing this letter represent just a small fraction of Ocean Conservancy members and supporters who care deeply about our ocean and want to see this comprehensive review process catalyze a rapid, just and equitable transition from fossil fuels to renewable energy sources.

Best,

Andrew

Andrew Hartsig  
Director, Arctic Program  
Ocean Conservancy  
750 W. 2nd Avenue, Suite 206  
Anchorage, AK 99501  
O: 907.885.3057  
[ahartsig@oceanconservancy.org](mailto:ahartsig@oceanconservancy.org)  
[Web](#) | [Facebook](#) | [Twitter](#)

**From:** [Corey Fisher](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Federal oil and gas program review comment submission  
**Date:** Thursday, April 15, 2021 6:31:14 PM  
**Attachments:** [BHA TRCP TU DOI oil and gas review comments.pdf](#)

---

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On behalf of Backcountry Hunters & Anglers, Theodore Roosevelt Conservation Partnership, and Trout Unlimited, please accept the attached comments respectfully submitted to help inform the Department's review of the federal oil and gas program as required by Executive Order 14008.

Sincerely,  
Corey Fisher



**Corey Fisher** / Public Land Policy Director  
C: (406) 546-2979 / O: (406) 926-1497  
[cfisher@tu.org](mailto:cfisher@tu.org)

**Trout Unlimited**  
312 N. Higgins, Suite 200  
Missoula, MT 59802  
<http://www.tu.org>

**From:** [Andrew Hartsig](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Ocean Conservancy comments on comprehensive review of federal oil and gas program  
**Date:** Thursday, April 15, 2021 6:29:13 PM  
**Attachments:** [2021.04.15 Ocean Conservancy DOI Comp Review Oil and Gas.pdf](#)

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Hello,

Attached please find Ocean Conservancy's comments on the Department of the Interior's comprehensive review of the federal oil and gas program, as called for in President Biden's Executive Order 14008.

Thank you for the opportunity to contribute our thoughts, and please don't hesitate to contact us if you have questions or would like more information.

Best wishes,

Andrew

Andrew Hartsig  
Director, Arctic Program  
Ocean Conservancy  
750 W. 2nd Avenue, Suite 206  
Anchorage, AK 99501  
O: 907.885.3057  
[ahartsig@oceanconservancy.org](mailto:ahartsig@oceanconservancy.org)  
[Web](#) | [Facebook](#) | [Twitter](#)

**From:** [Jacki Lopez](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] input on the Department of the Interior's review of the federal fossil fuel program on federal lands and in federal waters under Executive Order 14008  
**Date:** Thursday, April 15, 2021 6:22:16 PM  
**Attachments:** [2021\\_03\\_30\\_Oil\\_Drill\\_ltr\\_Big\\_Cypress\\_Haaland.pdf](#)

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**From:** [Kristen Hamman](#)  
**To:** [Energy Review](#)  
**Cc:** [Kristen Hamman](#)  
**Subject:** [EXTERNAL] Federal Oil and Gas Review - comments  
**Date:** Thursday, April 15, 2021 6:18:04 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[NDPC Comments to Interior - Federal Oil and Gas Program - 4-15-21.pdf](#)

---

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To Whom it May Concern:

Please accept our attached comments to be considered as your agency prepares an interim report on the federal oil and gas program.

Thank you,

**KRISTEN HAMMAN**

*Director of Regulatory and Public Affairs*



(701) 223-6380

[NDPetroleumFoundation.org](http://NDPetroleumFoundation.org) | [NDOil.org](http://NDOil.org)



**From:** [Aaron Clark](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments for DOI Oil and Gas Program Review  
**Date:** Thursday, April 15, 2021 5:59:05 PM  
**Attachments:** [IMBA Comments DOI O&G E.O.14008 Review April 2021.pdf](#)

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Please accept the following comments. Also attached.

The Honorable Deb Haaland April 15, 2021  
Secretary of the Interior  
1849 C Street  
Washington, D.C. 20240

Dear Secretary Haaland:

Thank you for the opportunity for the International Mountain Bicycling Association (IMBA) to provide recommendations on the Department of Interior's (DOI) review of the federal onshore oil and gas program. IMBA supports this review and its intentions. IMBA seeks to ensure the review will lead to better federal land management outcomes for all resource values, and particularly as it pertains to outdoor trail based recreational access and world class experiences.

The [International Mountain Bicycling Association](#) is a non-partisan, educational 501c3 non-profit with a mission to create, enhance and protect great places to ride mountain bikes and a diverse and inclusive vision for everyone across the U.S. to have access to great trails— from close-to-home rides to iconic, backcountry experiences hosted by our federal public lands. During the pandemic, cycling and mountain biking on public lands has emerged as ideal recreational pursuits that meet public health and safety guidelines. However, even in non-pandemic times, mountain biking has been growing and its economic value has been a boom to urban and rural economies that serve as gateways to public lands. Trails for mountain biking rely on federal, state and municipal public land managers encouraging policies that both protect resources and natural character, and advance trail access for residents and visitors, in order to ensure the economic growth and continuation of this healthy and sustainable activity.

When it comes to the agencies that fall under the DOI, the BLM is the most significant to the mountain biking community for its role in providing trail based recreation. The BLM manages approximately 245 Million surface acres, or 10% of the land in the U.S. However, the BLM manages 700 million acres of the subsurface mineral estate, which has a much

greater potential of further colliding with trail based recreation across public lands. Oil and gas (O&G) leasing and the operations that follow can have a direct impact on the quality of trail offerings for mountain bikers. Policies and permitting practices which stipulate the extraction methods and operations can determine whether O&G can share close proximity or whether it will dominate and displace other multiple uses of the landscapes such as trail based mountain bike recreation.

IMBA does not profess to be experts on the federal onshore oil and gas leasing program, however IMBA is a recreational expert and knowledgeable of public lands multi-use management, NEPA, and familiar with how mineral extraction contributes to our nation's climate impact and interacts and often interferes with other natural resource values and recreation.

In a tongue-and-cheek manner, one can compare recreation to a new kind of natural resource-based extraction industry. A recreation industry based on extracting experiences, where the public utilizes natural resources in connection with nature for health and wellness. Extracting recreation in this experiential manner can afford the public with infinitely sustainable value and quality of life benefits, extracted from public lands, that reliably drive local economies and free them of boom-and-bust cycles, setting them on a path of long-term climate resiliency, public health, and fiscal success. This lighthearted comparison forces us to consider the juxtaposition of the permanent removal of non-renewable resources through mineral extraction to the reusable enjoyment of natural resources through the extraction of life-long and generational recreation experiences.

The discussion and recommendations offered below are gleaned from our public lands work. They provide policy reforms that would mitigate the impacts our community of public land stakeholders experience due to the federal O&G Program, in both the direct experiential realm, as well as the relatively indirect contributions to climate change that negatively affect our communities in myriad ways.

For case studies, best practices and an overall deeper dive into how the federal O&G leasing program affects recreation, review the [Public Land Solutions](#) reports on “**How Speculative Oil & Gas Leasing is Threatening Economic Growth in the American West**” and “**Best Practices for Balancing Recreation and Energy Development on Our Public Lands.**”

[\[https://publiclandsolutions.org/wp-content/uploads/2020/04/PLS-LPL-Report91.pdf\]](https://publiclandsolutions.org/wp-content/uploads/2020/04/PLS-LPL-Report91.pdf)

[\[https://publiclandsolutions.org/wp-content/uploads/2017/04/PLS\\_Balancing-Rec-and-Energy-Report-web.pdf\]](https://publiclandsolutions.org/wp-content/uploads/2017/04/PLS_Balancing-Rec-and-Energy-Report-web.pdf)

Executive Order 14008 requires a comprehensive review of the federal O&G permitting and leasing program and a pause on new O&G lease sales. This review provides DOI the opportunity to review and assess for the first time in decades the federal fossil fuel programs, in order to modernize them and ensure outcomes adhere to current best practices and considerations. A holistic review such as this should fully include a comprehensive comparison of how the mineral leasing program overlaps, conflicts, or generally affects other public land multiple uses and the efficacy of long-term management and desired conditions as it relates to climate change and natural resource values.

Federal lands are a major contributor to the climate crisis as the federal O&G program accounts for nearly one quarter of all U.S. greenhouse gas emissions. Better aligning the O&G lease program with our nation's climate goals, conservation targets, and recreation economic development will help restore balance to our public land; thus, allowing our state and local communities to build back better and transition away from the boom-and-bust cycles and dwindling mineral reserves. Methane emissions, locked up idle and orphan wells, large and numerous well pad footprints, and goals of "energy dominance" lead to exclusive use and diminished value of our public lands.

The Federal Land Policy and Management Act (FLPMA) codified the BLM's multiple use mandate, which requires that resources and uses on public land be managed and utilized in a balanced combination, so no one use or resource need dominates the others. The intent here was that public lands strive to meet, to the greatest extent possible, the current and future needs of the people. Meeting the current needs of the people seems simple enough in short-term thinking but often is driven by greed and convenience. Ensuring today's management decisions and policies will also meet the future needs of our people requires a long view with discipline, restraint and preference given to what is sustainable and renewable. While the latter has been a consideration in management for some time, it has often been relegated to a secondary consideration in preference for the immediate gratification of economic vitality. The multiple use mandate must not be used one dimensionally to justify mineral extraction. This approach fails to study, acknowledge, and minimize the potential and real detrimental effects of the mineral leasing program on the recreational multiple uses. These uses are not only also appropriate, but yield greater sustained economic return and value and serve to provide all American's with a birth-right of public land access and opportunity. For example, FLPMA explicitly enumerates outdoor recreation a multiple use of public lands on par with all other multiple uses. The DOI agencies need to better honor the responsibility entrusted in them and to the public to be the expert stewards of our public lands, and not have one use or practice dominate over other legitimate uses.

### **Recommendations:**

**Recommendation 1:** The DOI should undergo a programmatic environmental impact statement (EIS) process and rulemaking to revise BLM's oil and gas regulations, coupled with administrative policy guidance and other non-rulemaking program reforms that can be implemented through DOI's existing authority. Program reforms should also be codified by further updating and amending the Mineral Leasing Act of 1920 (MLA) and working with Congress when possible to establish new statutes that can modernize our mineral extraction laws with an eye toward the future.

**Recommendation 2:** Results of a PEIS should then be expeditiously implemented by amending BLM Resource Management Plans (RMP). The BLM's approximately 150 RMPs are the basis for how O&G will be managed in the context of other resources and desired conditions. However, they are all based to some extent on the 100-year-old MLA and short-sighted priorities of previous administrations. These plans must be modernized for how these uses align with other existing and emerging priorities such as climate resiliency and

recreational and conservational value. Our public lands must cease being the climate problem and begin being a natural climate solution.

**Recommendation 3:** The practice of extending and/or renewing lease permits has led to a gluttony of inactive leases. Instead these leases should be phased out and retired. The process to extend or renew should undergo public comment and NEPA review so these inactive leases have the public scrutiny necessary to assess their status and likelihood of action. Currently this is not required. Of the nearly 37,500 federal leases, over one third of them are non-producing, covering half the 26.6 million acres leased. While it is understood a lengthy process takes place after leases are acquired to assess financial feasibility and profitability of operations, IMBA urges the agencies to require a demonstrable timeline for action on the part of the lease holder to avoid hoarding and stockpiling leases and permits. Often these holdings appear to be more about boosting stock and shareholder value and less about real investment and intent of economical extraction.

**Recommendation 4:** Stricter NEPA requirements. After leases are issued, the DOI and leasing agencies should consider tightening up what qualifies for a categorical exclusion (CE) to the requirement for additional NEPA review and what constitutes appropriate determination of NEPA adequacy (DNA). While there are legitimate roles for CEs and DNAs in the overall NEPA planning process—particularly for relatively benign actions like recreational trail stewardship—when it pertains to O&G leasing, these side-steps should be the rare exception as there exists a high probability for known environmental impacts. Equity, transparency and more robust public involvement should be incorporated to better review and assess the relationship of these lease sales on other competing and affected values.

**Recommendation 5:** Lease Stipulations. The DOI should strengthen and broaden surface occupancy stipulations that include more robust avoidance of visual and auditory resource impairments, as well as site specific and migratory air and water quality impairments. These impacts negatively affect local residents and visitors alike who live within the sights, sounds, smells of these operations or seek to enjoy adjacent public land, recreational trails and open spaces. Quality public land recreation is almost always predicated on natural resource integrity and the value of nature, solitude, and serenity. Management actions that diminish these values directly impair the recreational quality.

**Recommendation 6:** Appropriately shrink the excessive footprint of available lands. Currently federal lands that are not specifically closed to O&G leasing are considered available and open. This results in 90 percent of the 245 Million acres of lands managed by the BLM being considered available for leasing. This policy of “open unless designated closed” results in significant real and potential threats and conflicts with sustainable economic drivers that rely on natural resource integrity, such as trail based recreation like mountain biking. The DOI must begin this reform process by flipping this fundamental policy so it is a “closed unless designated opened for leasing” policy. The former policy drives speculative “wildcat” leasing that earmarks vast swaths of land for extraction. This threatens assurances and excludes investments made in sustainable recreation infrastructure that would create economic value for local communities. This value long

outlasts the marginal benefits of short-term and hypothetical mineral reserves.

**Recommendation 7:** IMBA supports the recommendations made by others asking the DOI to establish a new mandate for the O&G program that affirmatively recognizes oil and gas leasing as a discretionary action that should be authorized only when consistent with multiple use and sustained yield principles.

**Recommendation 8:** DOI should amend its oil and gas leasing regulations so robust public participation and tribal consultation are a mandatory, not optional, requirement for all leasing and permitting decisions.

**Recommendation 9:** Better develop and employ resource “screens” earlier in the leasing process. Establishing consistent screening criteria for assessing how nominated leases may conflict with other uses and resources, should the leases be fully developed or under the assumption they will be fully developed, should be a routine requirement to help mitigate collateral impacts. FLPMA and MLA both authorize the use of screens to prevent unnecessary or “undue degradation” of resources and public value, but because the leasing process is considered more of a paper exercise that does not guarantee any particular action, this step is omitted or deferred by the BLM until after the leases are issued and they receive an application for a permit to drill. Because the company has already paid for the lease, this creates an undue expectation they will be able to drill, which leads to skipping the important screening step. Our local mountain bike leaders in western communities have seen how this backwards process leads to inevitable conflicts with recreation.

**Recommendation 10:** The DOI should include in the reform process, investments in “Just Transitions” to help communities adjust and prepare for new economies. Just Transitions are a framework of societal investments to assist adjustments in the livelihoods of communities shifting their local economies into more sustainable and reliable economic sectors. Reforms without this assistance will only exacerbate the negative impacts, foster public discontent, and hinder support for more climate friendly management practices. These investments are imperative to any reform of the O&G program.

**Recommendation 11:** The DOI should incentivise business ingenuity to help accelerate investments and transition to a renewable energy economy.

**Recommendation 12:** Royalty reform. Century-old rates need to be updated and bring a fair return to taxpayers for leasing on public lands.

**Recommendation 13:** Bonding reform. The DOI reform should ensure O&G companies are required to post adequate bonds to prevent cleanup costs being pushed onto taxpayers when industry goes bankrupt and/or walks away from exhausted wells. This will also result in fewer orphaned wells that cause impacts to local communities, wildlife and recreation resources.

According to a 2018 Nature Conservancy study exploring climate change reductions through natural solutions, our nation’s public lands are a suitable means to addressing our climate crisis with the potential to absorb more than 20 percent of greenhouse gas pollution

in the United States. This will not happen with an O&G program that has public lands pumping one quarter of our emissions into the air. This reform effort is not only justified but it is imperative DOI tackle it with the commitment needed to turn these lands into a source of good.

Thank you for considering our comments and recommendations. IMBA anxiously awaits the reforms this review process will foster and how this will set our nation on a more sustainable path for energy development on public lands.

Sincerely,



International Mountain Bicycling Association (IMBA)  
PO Box 20280 Boulder, CO 80308

**On behalf of the following organizations:**

**Salida Mountain Trails**  
**Mike Smith, Board President**  
**Salida, COLORADO**

**Durango Trails**  
**Durango, COLORADO**

**Roaring Fork Mountain Bike Association**  
**Mike Pritchard, Executive Director**  
**Roaring Fork Valley, COLORADO**

**Vail Valley Mountain Trails Alliance**  
**Ernest Saeger, Executive Director**  
**Eagle County, COLORADO**

**Southwest Montana Mountain Bike Association**  
**Adam Oliver, Advocacy Director**  
**Bozeman, MONTANA**

**Trails Utah**  
**Sarah Bennett**  
**Salt Lake City, UTAH**

**Northeastern Utah Mountain Bikers**  
**Tildon Jones**  
**Vernal, UTAH**

Aaron Clark  
International Mountain Bicycling Association  
303.324.7031  
[aaron.clark@imba.com](mailto:aaron.clark@imba.com)

**From:** [Len Montgomery](#)  
**To:** [Energy Review](#); [Kelsey Lamp](#); [Matt Casale](#)  
**Subject:** [EXTERNAL] U.S. PIRG & Environment America organizational comment re: Federal Oil and Gas Program  
**Date:** Thursday, April 15, 2021 5:43:12 PM  
**Attachments:** [USPIRG & Environment America Organizational Comment 4.15.2021.pdf](#)

---

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To: Department of the Interior  
Fr: Matt Casale, U.S. PIRG, Kelsey Lamp and Ellen Montgomery, Environment America  
Re: U.S. PIRG & Environment America organizational comment re: Federal Oil and Gas Program  
4/15/2021

Attached please find a comment co-authored by advocates from Environment America and U.S. PIRG for your consideration as you review the Federal Oil and Gas Program. Thank you for the opportunity to submit feedback.

--

\*\*\*\*\*

Ellen "Len" Montgomery  
Public Lands Campaign Director  
720-583-4024 (c)

**Connect with me**



**Connect with [Environment America](#)**

[Environment America](#) & [Environment America Research & Policy Center](#)



**From:** [Matthew Giacona](#)  
**To:** [Energy Review](#)  
**Cc:** [Bob Warren](#)  
**Subject:** [EXTERNAL] IADC - follow-up submission re: Mar 25 virtual forum  
**Date:** Thursday, April 15, 2021 5:42:26 PM  
**Attachments:** [image001.png](#)  
[International Association of Drilling Contractors - DOI MAR25 Submission APR1521.pdf](#)

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To Whom it May Concern,

Please find attached follow-up remarks submitted to the Department of Interior (DOI) by the International Association of Drilling Contractors (IADC), in response to the Department's March 25<sup>th</sup> Virtual Forum examining the federal oil and gas program.

Please let me know if there is any additional information required to process this submission. Kindly acknowledge receipt of this submission.

Most Sincerely,

Matt Giacona  
Assistant Director, Government & Industry Affairs  
International Association of Drilling Contractors (IADC)  
1667 K Street NW, Suite 420  
Washington, DC 20006  
M: +1 (313) 580-6268  
O: +1 (202) 293-0670  
[www.iadc.org](http://www.iadc.org)



**From:** [Hoskins, Diane](#)  
**To:** [Energy Review](#)  
**Cc:** [Knodel, Marissa S](#)  
**Subject:** [EXTERNAL] Oceana Comments on Federal Offshore Oil and Gas Program  
**Date:** Thursday, April 15, 2021 5:33:10 PM  
**Attachments:** [image001.png](#)  
[leasing pause comment letter.pdf](#)  
[Biden TY Petition w Signatories.pdf](#)

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Please find attached, Oceana's official comments on the Federal Offshore Oil and Gas Program in response to the Department's request for public input on Interior's comprehensive review as called for in Executive Order 14008. Additionally, a petition from more than 13,000 Oceana wavemaker supporters.

Due to size limitations our supporting materials were too large to attach but can be downloaded here: [https://drive.google.com/drive/folders/1PSBhKhO1jC\\_zrS25ZH976hmJh20a3JPt?usp=sharing](https://drive.google.com/drive/folders/1PSBhKhO1jC_zrS25ZH976hmJh20a3JPt?usp=sharing)

Thank you—

Diane Hoskins

**Diane Hoskins** | Campaign Director



1025 Connecticut Ave. NW, Suite 200

Washington, DC, 20036

**D** 202.467.1948 | **C** 301.672.0894

[dhoskins@oceana.org](mailto:dhoskins@oceana.org) | [www.oceana.org](http://www.oceana.org)

**From:** [Guith, Christopher](#)  
**To:** [Energy Review](#)  
**Cc:** [Kastner, Megan](#)  
**Subject:** [EXTERNAL] U.S. Chamber of Commerce Comment Letter  
**Date:** Thursday, April 15, 2021 5:31:31 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[210415\\_Comments\\_LeasingBan\\_DOI\\_Final.pdf](#)

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Please find attached a comment letter in response to the Department of the Interior's indefinite ban on new energy production on federal lands and waters.

Thank you -christopher

**Christopher Guith**

Senior Vice President  
Global Energy Institute  
U.S. Chamber of Commerce | 1615 H Street, NW | Washington, DC 20062  
[202-463-5582 \(o\)](tel:202-463-5582)  
[202-834-3214 \(c\)](tel:202-834-3214)



U.S. CHAMBER OF COMMERCE

**From:** [Alonso, Shantha R](#) on behalf of [OS, OIEA](#)  
**To:** [Heard, Preston S](#); [Cardinale, Richard](#); [Lefton, Amanda B](#); [Daniel-Davis, Laura E](#); [Culver, Nada L](#); [Energy Review](#)  
**Subject:** Fw: [EXTERNAL] NSSGA Priorities  
**Date:** Thursday, April 15, 2021 5:16:26 PM  
**Attachments:** [image001.png](#)  
[NSSGA Department of Interior Priorities 2021.pdf](#)

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FYI - secretarial correspondence from National Sand and Gravel Association with congratulations to the Secretary as well as perspectives on energy, ESA, permitting, land access, and on 30x30.

---

**From:** Austin Bone <[abone@nssga.org](mailto:abone@nssga.org)>  
**Sent:** Wednesday, April 14, 2021 10:19 AM  
**To:** OS, OIEA <[OIEA@ios.doi.gov](mailto:OIEA@ios.doi.gov)>  
**Subject:** [EXTERNAL] NSSGA Priorities

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Hello – Please see the attached letter from the National Stone, Sand & Gravel Association. We look forward to working with you!

Austin

**Austin Bone**

*Director of Government Affairs*

DIRECT: 703.526.1091 CELL: 703.489.8854



**From:** [Meg Bankston](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] OCS Governor's Coalition Comments on DOI review of O/G program  
**Date:** Thursday, April 15, 2021 5:13:41 PM  
**Attachments:** [OCSGC Letter 4.15.21 Final DOI Comments.pdf](#)

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To Whom it may concern,

Please see the attached letter for comments on the Department of Interior's review of the Federal Oil and Gas program from the OCS Governor's Coalition. We look forward to working with you all. Please do not hesitate to let me know if you have any questions or should need additional information. The hard copy of the letter has been put in the mail as well.

Sincerely,

Meg Bankston

*Meg Vanderbrook Bankston  
Deputy Director of Legislative Affairs  
Office of Governor John Bel Edwards (LA)  
225-342-8275 Office  
225-247-8180 Cell*

**From:** [Aaron M. Sims](#)  
**To:** [Consultation, IA: Energy Review](#)  
**Subject:** [EXTERNAL] Pueblo of Acoma - Comment on Oil and Gas Permitting  
**Date:** Thursday, April 15, 2021 4:42:55 PM  
**Attachments:** [2021-04-14\\_Acoma Comments to DOI on OIL and Gas Permitting...PDF](#)

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Good afternoon,

On behalf of Governor Vallo and the Pueblo of Acoma, we are submitting these written comments on the Department of the Interior's requests for input on its oil and gas permitting and leasing program.

If you have any questions please do not hesitate to contact the Pueblo of Acoma.

Thank you,

Aaron M. Sims, Esq.

Chestnut Law Offices, P.A.

317 Commercial St. NE, Suite 102

Albuquerque, N.M. 87102

P: 505 842-5864

C: 505-681-4015

F: 505 843-9249

E: [ams@chestnutlaw.com](mailto:ams@chestnutlaw.com)

[www.chestnutlaw.com](http://www.chestnutlaw.com)

**From:** [Sindy Smith](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments: Federal Oil and Gas Program  
**Date:** Thursday, April 15, 2021 4:32:23 PM  
**Attachments:** [Federal Oil and Gas Program Comments.pdf](#)

---

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DOI Staff,

Please see attached comments concerning the Federal and Oil Gas Program.

Thank you,

Sindy

--

*Sindy Smith*  
*RDCC Coordinator*  
*Resource Development Coordinating Committee*  
*Public Lands Policy Coordinating Office*

*Capitol Complex*  
*5110 State Office Building*  
*Salt Lake City, UT 84114*  
[sindysmith@utah.gov](mailto:sindysmith@utah.gov)  
**Mobile: 385-522-0007**

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**From:** [Pete Obermueller](#)  
**To:** [Energy Review](#)  
**Cc:** [Colin Mckee](#); [Ryan McConnaughey](#)  
**Subject:** [EXTERNAL] PAW Comments on DOI's Oil and Gas Program  
**Date:** Thursday, April 15, 2021 4:31:44 PM  
**Attachments:** [20210415 PAW Comments - DOI Federal Oil and Gas Program Review - March 25 2021 Public Forum - FINAL.pdf](#)

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The Petroleum Association of Wyoming, representing Wyoming's primary economic driver and over 15,000 men and women who make their living in the oil and gas sector, respectfully submits the attached comments regarding the federal leasing program and responding to comments during the March 25<sup>th</sup>, 2021 forum.

Do not hesitate to contact me with any questions.

Kind Regards,

Pete

Pete Obermueller  
President  
Petroleum Association of Wyoming  
307-630-2068



**From:** [Landon Newell](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] SUWA and Wilderness Workshop comments on DOI oil and gas review  
**Date:** Thursday, April 15, 2021 4:27:50 PM  
**Attachments:** [SUWA and Wilderness Workshop - Comments on BLM's oil and gas review \(April 15, 2021\).pdf](#)

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Good afternoon -

Please find attached a comment letter regarding the Interior Department's review of the federal fossil fuels program. This comment letter is submitted on behalf of the Southern Utah Wilderness Alliance and Wilderness Workshop.

Thank you.

--

Landon Newell  
Staff Attorney  
Southern Utah Wilderness Alliance  
425 East 100 South  
Salt Lake City, Utah 84111  
Phone: 801-428-3991  
E-mail: [landon@suwa.org](mailto:landon@suwa.org)

**From:** [Robert McEntyre](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] New Mexico Oil & Gas Association (NMOGA) comments on the review of the federal oil and gas program  
**Date:** Thursday, April 15, 2021 4:25:54 PM  
**Attachments:** [NMOGA Comments to Interior Oil and Gas Program Review 04.15.21.pdf](#)  
[NMTRI Federal Lands Revenue.pdf](#)  
[NMTRI Economic impacts study update.pdf](#)  
[Federal Leasing Ban OnLocation Report 09.09.20.pdf](#)  
[Federal Leasing Ban New Mexico 09.09.20.pdf](#)

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To whom it may concern:

The New Mexico Oil & Gas Association (NMOGA) respectfully submits the following comments on behalf of its members in response to the Department of the Interior's request for feedback on its review of the federal oil and gas program.

**Robert McEntyre**  
**Director of Communications**  
**New Mexico Oil & Gas Association**  
Cell (770) 548-5571  
[robert@nmoga.org](mailto:robert@nmoga.org)  
P. O. Box 1864  
Santa Fe, NM 87504  
[www.nmoga.org](http://www.nmoga.org)

**From:** [Kelsie Rudolph](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comment Letter re: Arctic National Wildlife Refuge  
**Date:** Thursday, April 15, 2021 4:06:16 PM  
**Attachments:** [2021\\_04\\_15\\_DOI\\_OG\\_Forum\\_Arctic\\_Refuge\\_.pdf](#)

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Hello,

Attached is a letter from 22 groups regarding the Arctic National Wildlife Refuge to be submitted for the Federal Oil and Gas Program review comment period.

Please reach out if you have any questions,  
Kelsie Rudolph

---

**ALASKA  
WILDERNESS  
LEAGUE  
AND AFFILIATE  
ALASKA  
WILDERNESS  
LEAGUE|ACTION**

KELSIE RUDOLPH  
SHE/HER/HERS  
*Arctic Campaign Manager*

122 C St NW, Ste 240  
Washington, DC 20001  
Tel: 202-544-5205  
Fax: 202-544-5197  
[www.AlaskaWild.org](http://www.AlaskaWild.org)  
[www.AlaskaWildAction.org](http://www.AlaskaWildAction.org)

**From:** [marilynheiman@icloud.com](mailto:marilynheiman@icloud.com)  
**To:** [Energy Review](#)  
**Cc:** [Vivian Korthuis](#); [Melanie Bahnke](#); [Mellisa Johnson](#)  
**Subject:** [EXTERNAL] Comments on the Department of the Interior's Federal Oil and Gas Program  
**Date:** Thursday, April 15, 2021 4:03:46 PM  
**Attachments:** [2021\\_04\\_15\\_Secretary\\_Deb\\_Haaland\\_-\\_Oil\\_and\\_Gas\\_-\\_final.docx](#)  
[ATT00001.htm](#)  
[2017\\_10\\_11\\_Talking\\_Points\\_for\\_BOEM\\_Meeting\\_-\\_To\\_Distribute.docx](#)  
[ATT00002.htm](#)  
[2017\\_11\\_20\\_BOEM\\_Joint\\_Thank\\_You\\_Follow\\_Up\\_Letter\\_-\\_Kawerak\\_AVCP\\_BSEG.pdf](#)  
[ATT00003.htm](#)  
[2017\\_11\\_20\\_BOEM\\_Joint\\_Thank\\_You\\_Follow\\_Up\\_Letter\\_-\\_Kawerak\\_AVCP\\_BSEG\\_-\\_Attachments\\_1-10.pdf](#)  
[ATT00004.htm](#)  
[2017\\_11\\_20\\_BOEM\\_Joint\\_Thank\\_You\\_Follow\\_Up\\_Letter\\_-\\_Kawerak\\_AVCP\\_BSEG\\_-\\_Attachment\\_11.pdf](#)  
[ATT00005.htm](#)

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Attached you will find comments on the Department of the Interior's Federal Oil and Gas Program by Kawerak Inc., Association of Village Council Presidents, Bering Sea Elders Group and the Aleut Community of St. Saint Paul Island. Collectively these native organizations represent over 70 federally recognized Tribes in Western Alaska, the Bering Sea and the Bering Strait.

Also attached are documents that these organizations have submitted previously on offshore leasing and drilling.

Thank you,

Marilyn

Marilyn Heiman  
[Marilynheiman@icloud.com](mailto:marilynheiman@icloud.com)  
206-321-1834  
Pronouns: she, her

**From:** [Joan Brown.osf](#)  
**To:** [Energy Review](#)  
**Cc:** [joan@nm-ipl.org](mailto:joan@nm-ipl.org)  
**Subject:** [EXTERNAL] DOI energy review on leasing for oil and gas on public lands  
**Date:** Thursday, April 15, 2021 4:01:46 PM  
**Attachments:** [DOI letter April 15 Sec. Haaland NM IPL.docx](#)

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PO Box 27162, Albuquerque, New Mexico 87125 [www.nm-ipl.org](http://www.nm-ipl.org) \*\* [info@nm-ipl.org](mailto:info@nm-ipl.org) \*\* 505-266-6966

April 15, 2021

SUBMITTED VIA E-MAIL: [energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)

The Honorable Deb Haaland  
Secretary of the Interior  
1849 C Street  
Washington, D.C. 20240

Dear Secretary Haaland:

Thank you so much for taking public comments regarding the Department of Interior's leasing policies for oil and gas on public and federal lands. Our comments come from a faith perspective rooted in teachings of caring for neighbor and sacred creation from diverse religious and spiritual traditions. New Mexico Interfaith Power and Light works across the state of New Mexico with tens of thousands of people of faith and works very closely with Citizens Caring for the Future (Southeast NM), whose leadership from inception to the present includes various ministers and faith leaders.

Some of our faith leaders from Albuquerque have been to the Permian during an immersion experience where they witnessed much methane pollution on special cameras, discarded old equipment and pipes strewn on public lands, and a general disregard for the land, of which we are to be stewards. They are very concerned about human health, water, land and air.

We are very grateful for the pause to consider the path ahead. Since our work is one that invites a deeper reflection of the challenge that the current system of leasing, climate change crisis and concerns for neighbors and Our Common Home, we offer a larger context or an integral ecological approach that is required in addressing the task before the Department of Interior and all of us who are concerned.

A few excerpts taken from Pope Francis in a talk to oil and gas executives March 2021 offers a way to begin looking at the broken and outdated leasing system that currently advantages corporate interests that are disconnected from stewardship of land, water and air and concern for health of neighbor and future generations in light of climate justice.

<http://faceofgodfilm.com/address-by-his-holiness-pope-francis-to-the-executives-of-the-oil-and-gas-industry/>

“Yet even more worrying is the continued search for new fossil fuel reserves, whereas the Paris Agreement clearly urged keeping most fossil fuels underground. This is why we need to talk together – industry, investors, researchers and consumers – about transition and the search for alternatives. Civilization requires energy, but energy use must not destroy civilization!

Any exploitation of the environment that would refuse to consider these long-term issues could only attempt to stimulate a short-term economic growth, but in the long run would certainly have a negative impact, affecting intergenerational equality and the process of development.

A critical evaluation of the environmental impact of economic decisions will always be needed, in order to take into proper account their long-term human and environmental costs. To the extent possible, such an evaluation should involve local institutions and communities in decision-making processes.

...Only by thinking and acting with constant concern for this underlying unity that overrides all differences, only by cultivating a sense of universal intergenerational solidarity, can we set out really and resolutely on the road ahead.

Unlimited faith in markets and technology has led many people to believe that shifts in economic or technological systems will be sufficient to remedy the current ecological and social imbalances. Yet we must acknowledge that the demand for continuous economic growth has led to severe ecological and social consequences, since our current economic system thrives on ever-increasing extraction, consumption and waste.

**“The problem is that we still lack the culture needed to confront this crisis. We lack leadership capable of striking out on new paths in meeting the needs of the present with concern for all and without prejudice towards coming generations” (Laudato Si’, 53).**

Reflecting on these deeper underlying cultural issues leads us to think anew about the very purpose of life. “There can be no renewal of our relationship with nature without a renewal of humanity itself” (Laudato Si’, 118). Such renewal calls for a new form of leadership, and such leaders must have a clear and profound realization that the earth is a single system and that humanity, likewise, is a single whole. Pope Benedict has reminded us that “the book of

nature is one and indivisible; it embraces not only the environment but also life, sexuality, marriage, the family, social relations: in a word, integral human development. Our duties towards the environment are linked to our duties towards the human person, considered in relation to others. It would be wrong to uphold one set of duties while trampling on the other. Herein lies a grave contradiction in our mentality and practice today: one which demeans the person, disrupts the environment and damages society” (Caritas in Veritate, 51).

We welcome an integral ecology approach in addressing the leasing and use of public lands. We support a commitment and direction that ensures that our public lands are managed to best serve the public interest by temporarily pausing leasing in order to undertake the first comprehensive review of the leasing program in decades. We also wonder if changes in fiscal rates could provide the money that frontline communities need in order to sustain needed infrastructure in an active oil and gas region. Infrastructure such as adequate air monitors, GPS controlled trucks that keep produced water from being dumped illegally, safe roads, and healthcare facilities that can handle some of the accidents that are so common in frontline communities as well as health studies and services to address what appear to be increased incidences of bronchial problems and cancers.

Some of our specific areas of concern requiring solutions and reforms as we ultimately look to a transition from oil and gas include:

- Revision the work of the Bureau of Land Management (BLM) from a belief that all lands need to be leased even when this does various harms.
- Address speculative leasing practices, which have opened 90 percent of BLM lands to leasing even though less than a quarter of public lands, have moderate to high development potential.
- Noncompetitive leasing is a wasteful practice of the oil and gas leasing system that allows industry to scoop up public lands via backdoor deals that hardly ever provide any benefit back to taxpayers. [99 percent](#) of noncompetitive leases never enter production in their primary terms, and yet they still managed to [tie up](#) over 2.9 million acres of our public lands between 2009 and 2018.
- Consider other uses for public lands that benefit the future and imagine a future not imagined, rather than trashing land, which is so blatant in the Permian Basin.
- The orphaned well crisis on public lands is increasing in urgency, particularly as the number of oil and gas companies [filing for bankruptcy continues to rise](#). Insolvent companies should not be able to shift their clean-up costs onto taxpayers and private landowners. The Government Accountability Office (GAO) has estimated that as many as [99 percent](#) of the bonds for wells currently operating on federal lands are insufficient for covering remediation costs if any of those wells were to become orphaned. In order to address the root cause of the problem, the Interior Department should eliminate nationwide bonding and increase individual and statewide bonding requirements, drawing on the provisions included in the bonding reform [bills](#) that Senator Bennett and

Representative Lowenthal have both [introduced](#).

- Lastly, if leasing is to continue, oil and gas companies must start fairly compensating taxpayers for developing on the public lands that belong to all of us. Outdated fiscal rates are exploiting our public lands resources, and it is estimated that taxpayers [lost](#) up to \$12.4 billion in revenue from oil and gas drilling on federal lands from 2010 through 2019 due to the century-old royalty rate of 12.5 percent.

We hold public lands in trust forever. We do not own them. We are charged with stewardship. Unfortunately, much of South East New Mexico is public and is becoming an increasingly toxic Sacrifice Zone. As we treat this land and water, so we treat the people who live there and the people of New Mexico and future generations.

Thank you for taking seriously the ethical and moral responsibilities of the Department of Interior to care for Mother Earth, our neighbors and Our Common Home.

Peace and good,  
Sr. Joan Brown,osf  
Executive Director, NM Interfaith Power and Light

--

Joan Brown,osf  
Executive Director  
New Mexico Interfaith Power and Light (NMIPL)

New Mexico Interfaith Power and Light  
PO Box 27162  
Albuquerque, NM 87125  
505-266-6966 [www.nm-ipl.org](http://www.nm-ipl.org) [info@nm-ipl.org](mailto:info@nm-ipl.org)

1004 Major Ave. NW.  
Albuquerque, NM 87107  
[joanbrown@nm-ipl.org](mailto:joanbrown@nm-ipl.org)

"There is no inner world without the outer world." Thomas Berry, Author of  
The Great Work



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**From:** [Meg Bankston](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] State of Louisiana Comments on DOI review of O/G program  
**Date:** Thursday, April 15, 2021 4:00:48 PM  
**Attachments:** [Daniel-Davis Ltr 2021 04 15 - DOI comprehensive review of federal oil gas program.pdf](#)

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Hi,

Please see the attached letter for comments on the Department of Interior's review of the Federal Oil and Gas program from Governor Edwards. We look forward to working with you all. Please do not hesitate to let me know if you have any questions or should need additional information. The hard copy of the letter has been put in the mail as well.

Sincerely,

Meg Bankston

*Meg Vanderbrook Bankston  
Deputy Director of Legislative Affairs  
Office of Governor John Bel Edwards (LA)  
225-342-8275 Office  
225-247-8180 Cell*

**From:** [Pickle, Julia](#)  
**To:** [Energy Review](#)  
**Cc:** [Alonso, Shantha R](#); [Blankenship, Chris](#)  
**Subject:** [EXTERNAL] Oil and Gas Leasing Program  
**Date:** Thursday, April 15, 2021 3:50:34 PM  
**Attachments:** [image001.png](#)  
[Letter from Governor Ivey to DOI Daniel- Davis 4.15.21 \( FINAL \).pdf](#)

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Please find the attached letter from Governor Ivey commenting on the oil and gas leasing program. If there is further information needed from us please let me know.

Julia



**Julia Pickle**  
*Federal Affairs Director*

Office of Governor Kay Ivey  
600 Dexter Avenue • Montgomery, AL • 36130  
Office: 334-353-4952 • Fax: 334-242-3770

[Julia.Pickle@governor.alabama.gov](mailto:Julia.Pickle@governor.alabama.gov)  
<https://governor.alabama.gov>

**From:** [Kelsie Rudolph](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comment Letter re: National Petroleum Reserve-Alaska  
**Date:** Thursday, April 15, 2021 3:50:08 PM  
**Attachments:** [2021\\_04\\_15\\_DOI\\_OG\\_Forum\\_NPRA\\_Letter.pdf](#)

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Hello,

Attached is a letter from 14 groups regarding the National Petroleum Reserve-Alaska to be submitted for the Federal Oil and Gas Program review comment period.

Please reach out if you have any questions,  
Kelsie Rudolph

---

**ALASKA  
WILDERNESS  
LEAGUE  
AND AFFILIATE  
ALASKA  
WILDERNESS  
LEAGUE|ACTION**

KELSIE RUDOLPH  
SHE/HER/HERS  
*Arctic Campaign Manager*

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Fax: 202-544-5197  
[www.AlaskaWild.org](http://www.AlaskaWild.org)  
[www.AlaskaWildAction.org](http://www.AlaskaWildAction.org)

**From:** [Deidre Kohlrus](#)  
**To:** [Energy Review](#)  
**Cc:** [Tim Tarpley](#); [Maria Suarez](#)  
**Subject:** [EXTERNAL] Submission for DOI Interim Report on Federal Oil and Gas Program  
**Date:** Thursday, April 15, 2021 3:48:47 PM  
**Attachments:** [image001.png](#)  
[Energy Workforce and Technology Council Letter on Federal Oil and Gas Program.pdf](#)

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Good Afternoon,

On behalf of the Energy Workforce & Technology Council we respectfully submit the attached letter for consideration as the Department of Interior reviews the federal oil and gas program.

Thank you for your consideration, and please let us know if there is any additional information we might provide on this important issue.

Sincerely,

Deidre

**Deidre Almstead Kohlrus**

Director – Government Affairs

 **ENERGY WORKFORCE  
& TECHNOLOGY COUNCIL**  
2500 Citywest Blvd, Suite 1110 | Houston, Texas 77042  
o: 713.932.0168 | [dkohlrus@energyworkforce.org](mailto:dkohlrus@energyworkforce.org)

Connect with us



**From:** [John Hiscock](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Consolidated Cmts. - DOI O&G Review & National Trails  
**Date:** Thursday, April 15, 2021 3:40:44 PM  
**Attachments:** [Cmts to DOI re O&G & NTs - 4-15-21.pdf](#)  
[FINAL - SUWA et al. - Comments on Sept. Lease Sale EA \(July 9 2020\).pdf](#)  
[FINAL - SUWA et al - Protest of Sept. 2020 lease sale \(Aug. 21, 2020\).pdf](#)  
[PEER & Hiscock- Cmts on Dec. UT O&G EA - 9-4-20.pdf](#)  
[OSTA Comments - Utah BLM December Oil&Gas Environmental Assessment 090420.pdf](#)  
[PEER & Hiscock- Protest on UT Dec Lease Sale.final.11\\_2\\_20.pdf](#)  
[OSTA Protest Letter to December Oil and Gas Lease Sale 110220.pdf](#)  
[TWS et al GSENM KEPA FEIS Protest \(1\).pdf](#)  
[GSENM-KEPA Modified FEIS-RMP Protest - J Hiscock - 11-18-19.pdf](#)

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Thank you for the opportunity to provide these comments in response to the DOI oil and gas leasing program review, and how said program relates to administration, management and protection of the National Trails System. The comments are submitted by a coalition of organizations (please reference letter).

(Please note that this submission includes the comment letter and appendix files.)

John W. Hiscock  
1502 South McAllister Dr.  
Kanab, UT 84741  
[johnwhiscock@gmail.com](mailto:johnwhiscock@gmail.com)  
435-689-1609

**From:** [Matthew Kirby](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] National Parks Conservation Association member comments  
**Date:** Thursday, April 15, 2021 3:21:35 PM  
**Attachments:** [image001.png](#)  
[NPCA Advocate Comments.pdf](#)

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Please accept this collation of 1,554 comments from NPCA members and supporters regarding the oil and gas leasing reform process.

Please let me know if you have any further questions.

**Matt Kirby**

Director | Energy and Landscape Conservation | National Parks Conservation Association  
(office) 303.720.3065 | (cell) 414.232.3035 | [mkirby@npca.org](mailto:mkirby@npca.org)

***Preserving Our Past. Protecting Our Future.***

Speak up for national parks. Join us at [npca.org](http://npca.org)



**From:** [Matthew Kirby](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] National Parks Conservation Association comments  
**Date:** Thursday, April 15, 2021 3:19:16 PM  
**Attachments:** [image001.png](#)  
[NPCA-Federal Oil and Gas Program Review.pdf](#)

---

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Please accept this letter on behalf of the National Parks Conservation Association for the oil and gas program review.

Let me know if I can provide anything further.

**Matt Kirby**

Director | Energy and Landscape Conservation | National Parks Conservation Association  
(office) 303.720.3065 | (cell) 414.232.3035 | [mkirby@npca.org](mailto:mkirby@npca.org)

***Preserving Our Past. Protecting Our Future.***

Speak up for national parks. Join us at [npca.org](http://npca.org)



**From:** [Taylor, Stephen](#)  
**To:** [Energy Review](#)  
**Cc:** [DeFendis, Dalton](#)  
**Subject:** [EXTERNAL] Comments for Interim Report  
**Date:** Thursday, April 15, 2021 2:57:15 PM  
**Attachments:** [image001.png](#)  
[DOI Let 041521fxx.pdf](#)

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Attached are comments from The Surety & Fidelity Association of America for the Interim Report.

Please contact me if you have any questions or need additional information.

Regards,

Stephen

**Stephen C. Taylor**

*Director of Policy and Assistant General Counsel*

**The Surety & Fidelity Association of America**

Office: 202.778.3624 | Cell: 202.486.3139 | [staylor@surety.org](mailto:staylor@surety.org)

[www.surety.org](http://www.surety.org)

 **The Surety & Fidelity**  
ASSOCIATION OF AMERICA

*Protecting Workers, Taxpayers & Businesses*



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**From:** [Tom Delehanty](#)  
**To:** [Energy Review](#)  
**Cc:** [mfreeman@earthjustice.org](mailto:mfreeman@earthjustice.org); [egrafe@earthjustice.org](mailto:egrafe@earthjustice.org); [jharbine@earthjustice.org](mailto:jharbine@earthjustice.org); [eric.huber@sierraclub.org](mailto:eric.huber@sierraclub.org); [luke@conservationco.org](mailto:luke@conservationco.org); [ahedges@meic.org](mailto:ahedges@meic.org); [emolvar@westernwatersheds.org](mailto:emolvar@westernwatersheds.org); [peter@wildernessworkshop.org](mailto:peter@wildernessworkshop.org); [scott@cowildlands.org](mailto:scott@cowildlands.org); [emily@westerncoloradoalliance.org](mailto:emily@westerncoloradoalliance.org); [shelley@greatoldbroads.org](mailto:shelley@greatoldbroads.org)  
**Subject:** [EXTERNAL] Comments re Federal Fossil Fuel Review  
**Date:** Thursday, April 15, 2021 2:54:19 PM  
**Attachments:** [FINAL - comments on DOI fossil fuel review - 4.15.21.pdf](#)

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Good afternoon,

Attached is a comment letter for consideration as part of the Interior Department's ongoing programmatic review of the federal fossil fuel programs, submitted by the following organizations:

- Earthjustice
- Colorado Wildlands Project
- Conservation Colorado
- Great Old Broads for Wilderness
- Montana Environmental Information Center
- Sierra Club
- Western Colorado Alliance
- Western Watersheds Project
- Wilderness Workshop

Thank you,

Tom Delehanty  
Associate Attorney  
Earthjustice Rocky Mountain Office  
633 17<sup>th</sup> Street, Suite 1600  
Denver, CO 80202  
T: 303.996.9628  
[earthjustice.org](http://earthjustice.org)  
Pronouns: he, him, his

**From:** [Kenny Stein](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comment submission for energy review  
**Date:** Thursday, April 15, 2021 2:11:47 PM  
**Attachments:** [IER Comments on Interior oil and gas program review.pdf](#)

---

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Please see attached comments from the Institute for Energy Research.

--

Kenny Stein  
*Director of Policy*  
Institute for Energy Research  
1155 15th Street, NW, Suite 900  
Washington, DC 20005  
202-621-2946 (direct)  
202-573-2904 (cell)

[instituteforenergyresearch.org](http://instituteforenergyresearch.org)

**From:** [Mary Greene](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] NWF et al oil and gas leasing program review comments  
**Date:** Thursday, April 15, 2021 2:02:55 PM  
**Attachments:** [image001.png](#)  
[National Wildlife Federation et al., comments on oil and gas leasing program review.pdf](#)

---

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To whom it may concern,

Please find attached comments submitted on behalf of the National Wildlife Federation, the Colorado Wildlife Federation, the Idaho Wildlife Federation, the Montana Wildlife Federation, the Nevada Wildlife Federation, the New Mexico Wildlife Federation, the Nebraska Wildlife Federation, the Iowa Wildlife Federation, the South Carolina Wildlife Federation, the Virginia Conservation Network, the Wyoming Wildlife Federation, and the Texas Conservation Alliance regarding the Department of Interior's review of its oil and gas leasing program.



**Mary Greene**  
**Public Lands Attorney**

She, her, hers  
National Wildlife Federation  
Cell: 401.369.2949  
work: 303.441.5159

[www.nwf.org](http://www.nwf.org)

*Uniting all Americans to ensure wildlife thrive in a rapidly changing world*

**From:** [Michael Maragos](#)  
**To:** [Energy Review](#)  
**Cc:** [Autumn Hanna](#)  
**Subject:** [EXTERNAL] Comments on the Federal Oil and Gas Program Review  
**Date:** Thursday, April 15, 2021 2:01:41 PM  
**Attachments:** [TCS Comments DOI Oil & Gas Program Review 04-15-2021.pdf](#)

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Interior Department Staff:

Please find attached comments submitted on behalf of Taxpayers for Common Sense on the Review of the Federal Oil and Gas Program. We appreciate the opportunity to provide input and look forward to future chances to comment on proposals that we hope will implement long-needed reforms to the program.

Thank you,  
-Michael

**Michael J. Maragos**  
Senior Policy Analyst

202-546-8500 x 127  
[Maragos@Taxpayer.net](mailto:Maragos@Taxpayer.net)

 **TAXPAYERS** *for*  
**COMMON SENSE**  
[Taxpayer.net](http://Taxpayer.net)

**From:** [lori@gulfeconomicssurvival.org](mailto:lori@gulfeconomicssurvival.org)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] GEST Comment Letter RE DOI Comprehensive Review of the Federal Oil & Gas Program  
**Date:** Thursday, April 15, 2021 1:59:04 PM  
**Attachments:** [GEST DOI Secretary Haaland Letter 04152021.pdf](#)

---

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On behalf of the Gulf Economic Survival Team (GEST), please find attached our comment letter as per the March 25 Forum soliciting comments for the Comprehensive Review of the Federal Oil & Gas Program.

Thank you for the opportunity to submit comments. GEST looks forward to working with DOI throughout this process. Please contact me if you have any questions.

Sincerely,

Lori LeBlanc  
Executive Director  
Gulf Economic Survival Team  
C: 985.209.7932

**From:** [Mary Greene](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] National Wildlife Federation et al. Comments on oil and gas program review  
**Date:** Thursday, April 15, 2021 1:57:36 PM  
**Attachments:** [image001.png](#)  
[National Wildlife Federation et al., comments on oil and gas leasing program review.pdf](#)

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To whom it may concern,

Please find attached comments submitted on behalf of the National Wildlife Federation, the Colorado Wildlife Federation, the Idaho Wildlife Federation, the Montana Wildlife Federation, the Nevada Wildlife Federation, the New Mexico Wildlife Federation, the Nebraska Wildlife Federation, the Iowa Wildlife Federation, the South Carolina Wildlife Federation, the Virginia Conservation Network, the Wyoming Wildlife Federation, and the Texas Conservation Alliance regarding the Department of Interior's review of its oil and gas leasing program.



**Mary Greene**  
**Public Lands Attorney**  
She, her, hers  
National Wildlife Federation  
Cell: 401.369.2949  
work: 303.441.5159  
[www.nwf.org](http://www.nwf.org)

*Uniting all Americans to ensure wildlife thrive in a rapidly changing world*

**From:** [Lori Leblanc](#)  
**To:** [Energy Review](#)  
**Cc:** [Tyler Gray](#)  
**Subject:** [EXTERNAL] LMOGA Comment Letter RE DOI Comprehensive Review of the Federal Oil & Gas Program  
**Date:** Thursday, April 15, 2021 1:55:53 PM  
**Attachments:** [LMOGA DOI Secretary Haaland Letter 04152021.pdf](#)

---

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On behalf of Tyler Gray, President of the Louisiana Mid-Continent Oil & Gas Association (LMOGA), please find attached our comment letter as per the March 25 Forum soliciting comments for the Comprehensive Review of the Federal Oil & Gas Program.

Thank you for the opportunity to submit comments and LMOGA looks forward to working with DOI throughout this process. Please contact myself or LMOGA President Tyler Gray ([tyler.gray@lmoga.com](mailto:tyler.gray@lmoga.com)) if you have any questions.

Sincerely,

Lori LeBlanc  
Vice President, Louisiana Mid-Continent Oil & Gas Association  
730 North Blvd.  
Baton Rouge, LA 70802  
[lori.leblanc@lmoga.com](mailto:lori.leblanc@lmoga.com)  
O: 225.387.3205  
C: 985.209.7932

**From:** [Holly Hopkins](#)  
**To:** [Energy Review](#)  
**Cc:** [Kevin O'Scannlain](#)  
**Subject:** [EXTERNAL] Comprehensive Review of the Federal oil and gas Program  
**Date:** Thursday, April 15, 2021 1:46:14 PM  
**Attachments:** [image001.png](#)  
[API Comments for DOI Comprehensive Review of Federal Oil and Gas Program.pdf](#)

---

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Attached please find comments from the American Petroleum Institute on the Department's comprehensive review of the federal oil and gas program called for in Executive Order 14008. Should you have any questions, please feel free to contact Kevin O'Scannlain or myself.

Thank you,

**Holly A. Hopkins**

Manager, Upstream Policy  
American Petroleum Institute  
o: 202.682.8439  
[www.api.org](http://www.api.org)



American  
Petroleum  
Institute

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**From:** [Tanya Lauer](#)  
**To:** [Energy Review](#)  
**Cc:** [Nick Gibbens](#)  
**Subject:** [EXTERNAL] Federal Oil & Gas Leasing Review - Comments by EnVen  
**Date:** Thursday, April 15, 2021 1:45:10 PM  
**Attachments:** [EnVen Comments to DOI Review of Federal Leasing Program 4.15.2021.pdf](#)

---

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Good afternoon,

Please find attached EnVen Energy Ventures, LLC's comments to the Department of Interior regarding the Department's comprehensive review of the federal oil and gas leasing programs.

Best regards,

**Tanya Lauer**

Land Manager

EnVen Energy Ventures, LLC

609 Main Street, Suite 3200 | Houston, Texas 77002

o. 713.335.7030 | m. 832.799.0962

[tlauer@enven.com](mailto:tlauer@enven.com)

**From:** [Katie E. Klass](#)  
**To:** [Consultation, IA: Energy Review](#)  
**Cc:** [Governor](#); [Ben Chavarria](#); [Danny D. Naranjo](#); [aberlylaw@swcp.com](mailto:aberlylaw@swcp.com)  
**Subject:** [EXTERNAL] Santa Clara Pueblo Comments on Oil and Gas Permitting and Leasing Program  
**Date:** Thursday, April 15, 2021 1:27:07 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[SCP Comments on and Recommendation to the DOI Comprehensive Review Under Executive Order 14008 of Oil and Gas Permitting and Leasing Program 04142021.pdf](#)

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Attached please find comments from the Santa Clara Pueblo related to the Department's comprehensive review under Executive Order 14008 of the oil and gas permitting and leasing program.

In a Dear Tribal Leader Letter dated March 15, 2021, the Department invited tribes to participate in a tribal consultation on ways to improve the Department's support for developing tribal renewable and conventional energy resources. The Department also invited the public to participate in a public forum on the federal oil and gas program and stewardship of public lands. The Pueblo submits the attached comments in response to both commenting opportunities.

Thank you.

Katie

**Katie E. Klass, Partner**

T 202.822.8282 | F 202.296.8834

**HOBBS STRAUS DEAN & WALKER, LLP**

1899 L Street NW, Suite 1200, Washington, DC 20036

**HOBBSSTRAUS.COM**



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**From:** [Adam Carlesco](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Public Lands Leasing Reform Comments  
**Date:** Thursday, April 15, 2021 1:23:58 PM  
**Attachments:** [DOI Public Lands Leasing - FWW Comments.pdf](#)

---

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Dept. of Interior Officials,

Please see the attached comments submitted by **Food & Water Watch** on behalf of its more than 1 million supporters nationwide. We sincerely hope the Department will consider the points raised within when evaluating how it should reform its public lands leasing program.

Adam Carlesco

-----  
**Adam Carlesco**

(he/him)

Staff Attorney, Climate & Energy

[Food & Water Watch](#) and [Food & Water Action](#)

Office: 202.683.4925

1616 P Street NW, Suite 300

Washington, DC 20036

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**From:** [Rachel Kondor](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments on DOI Energy Review  
**Date:** Thursday, April 15, 2021 1:02:43 PM  
**Attachments:** [EDC Letter to DOI re Federal Leasing Program\\_21\\_4\\_15 Final.pdf](#)

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**RACHEL KONDOR (she/her/hers)**

STAFF ATTORNEY

906 Garden Street

Santa Barbara, CA 93101

805.963.1622 ext. 113

[www.EnvironmentalDefenseCenter.org](http://www.EnvironmentalDefenseCenter.org)

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**From:** [Jim Winchester](#)  
**To:** [Energy Review](#)  
**Cc:** [Wells, Steven](#); [rdavis@merriion.bz](mailto:rdavis@merriion.bz)  
**Subject:** [EXTERNAL] Public Comment Submittal: Executive Order 14008 & Response to National Forum  
**Date:** Thursday, April 15, 2021 12:56:53 PM  
**Attachments:** [IPANM Exec. Order 14008 Response Federal Comment Letter - FINAL.pdf](#)

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April 15, 2021  
12:47 p.m. ET

To Whom It May Concern at the U.S. Department of Interior & Bureau of Land Management:

Please see the attached Public Comment Letter from the Independent Petroleum Association of New Mexico (IPANM) regarding Executive Order 14008 with our comments as part of the March 25, 2021, National Public Forum on Federal Oil & Gas Policy.

Thank you for your consideration.

Highest regards,

--jim



**From:** [Bailey Brennan](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Wyoming County Commissioners Association Comment Letter on Executive Order 14008  
**Date:** Thursday, April 15, 2021 12:56:16 PM  
**Attachments:** [WCCA Letter - DOI Leasing Moratorium April 15 2021.pdf](#)

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Hello,

Please find attached a comment letter from the Wyoming County Commissioners Association on Executive Order 14008 and the Department of Interior's implementation of the EO. If you have any questions, please do not hesitate to reach out.

Best,  
Bailey

**Bailey K. Brennan** | Natural Resources Counsel | **Wyoming County Commissioners Association**  
408 West 23<sup>rd</sup> Street | Cheyenne, WY 82001  
C: 307-709-5643 | O: 307-632-5409  
[bbrennan@wyo-wcca.org](mailto:bbrennan@wyo-wcca.org) | [www.wyo-wcca.org](http://www.wyo-wcca.org)



**From:** [Kole Kelley](#)  
**To:** [Energy Review](#)  
**Cc:** [Michael Jewell](#)  
**Subject:** [EXTERNAL] Terra Energy Partners Comments for Federal Oil and Gas Program Review  
**Date:** Thursday, April 15, 2021 12:53:14 PM  
**Attachments:** [image001.png](#)  
[Terra Letter to the DOI 4.15.21 .pdf](#)

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Dear Madam Secretary:

On behalf of Terra Energy Partners, attached are comments to be considered for the Department of the Interior's interim report on the Federal Oil and Gas program. Thank you for the opportunity to provide input and let us know if you have any questions.

Thanks!

Kole

**Kole Kelley**  
Associate

[kkelley@jnrllaw.com](mailto:kkelley@jnrllaw.com)  
719.580.5657

---

JEWELL  
JIMMERSON  
N A T U R A L R E S O U R C E S L A W

---

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Thank you

**From:** [Joan Brown.osf](#)  
**To:** [Energy Review](#)  
**Cc:** [Kayley Shoup](#); [Nick and Ronda King](#); [chris Fierro](#)  
**Subject:** [EXTERNAL] Energy review comments DOI  
**Date:** Thursday, April 15, 2021 12:49:54 PM  
**Attachments:** [DOI April 14 CCFE comment letter.docx](#)

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April 15, 2021

SUBMITTED VIA E-MAIL: [energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)

Re: Comments on Energy Review of Department of Interior

From: Citizens Caring for the Future

Contact: Kayley Shoup, Organizer with Citizens Caring for the Future  
[kayley.shoup.ccff@gmail.com](mailto:kayley.shoup.ccff@gmail.com)

The Honorable Deb Haaland

Secretary of the Interior

1849 C Street

Washington, D.C. 20240

Dear Secretary Haaland:

Thank you for allowing comments on the Energy Review in the Department of Interior. This issue is of great concern to those of us living in the Permian Basin in Southeast New Mexico. Citizens Caring for the Future is a group of faith leaders and ordinary citizens who formed about two years ago because our voices were not being heard over the loud voices of industry and local political power brokers in our region. While we realize that transition from oil and gas will take time, we do believe that some changes need to be made and citizens should not

be taken advantage of nor future generations compromised.

We live day in and day out with pollution, concerns about water as we live into an exceptional drought, climate change, health problems and cycles of economic boom and bust which are all related to the oil and gas industry in our region. While our region relies on this industry for some jobs and economic base, this is not our entire economy and in ways it has adversely affected our agriculture and tourist economies as well as quality of life.

The federal oil and gas leasing program is broken and terribly out of step with the needs of our 21st century economy. It seems that oil and gas companies have gotten many advantages and deals and we are not sure that these really help ordinary citizens and our region. In some ways it feels like our public lands are almost given away for leasing in extraction. For far too long, the leasing system has prioritized development at the expense of wildlife, recreation, clean air and water, and fair returns to taxpayers.

We welcome a commitment and direction that ensures that our public lands are managed to best serve the public interest by temporarily pausing leasing in order to undertake the first comprehensive review of the leasing program in decades. We also wonder if changes in fiscal rates could provide the money that frontline communities need in order to sustain needed infrastructure in an active oil and gas region. Infrastructure such as adequate air monitors, GPS controlled trucks that keep produced water from being dumped illegally, safe roads, and healthcare facilities that can handle some of the accidents that are so common in frontline communities as well as health studies and services to address what appear to be increased incidences of bronchial problems and cancers.

During the review, we encourage the administration to embrace a number of solutions and reforms, which we have included below.

- A new mandate must be adopted for the oil and gas leasing program. The Bureau of Land Management (BLM) has long-operated under the belief that leasing is statutorily required and therefore should be elevated above other uses. The Interior Department must recognize that leasing is not in fact mandated by federal law, and that leasing on public lands should be allowed only if and when consistent with the principle of multiple use, which is necessary for managing public lands for the long-term needs of future generations.
- In order to address the speculative leasing practices [that have become so rampant on public lands](#), it is necessary to prohibit the leasing of lands identified through planning documents as having low or no potential for oil and gas development. BLM does not currently account for development potential when deciding whether lands should be open or closed to leasing, or when deciding which lands to offer for leasing. As a consequence, [90 percent](#) of BLM lands have been opened to leasing even though less than a quarter of public lands have moderate to high development

potential. The Interior Department should issue a new policy that prevents making lands with low and no development potential eligible for leasing in land use plans and available for leasing at auction, including incorporating provisions from Senator Cortez Masto's [bill](#) to statutorily prohibit leasing on low and no potential lands.

- Noncompetitive leasing is another incredibly wasteful practice of the oil and gas leasing system that allows for industry to scoop up public lands via backdoor deals that hardly ever provide any benefit back to taxpayers. [99 percent](#) of noncompetitive leases never enter production in their primary terms, and yet they still managed to [tie up](#) over 2.9 million acres of our public lands between 2009 and 2018. This process must be eliminated, and the Interior Department should include a finding in their report stating the need for Congress to pass the legislation necessary for doing so.
- The orphaned well crisis on public lands is increasing in urgency, particularly as the number of oil and gas companies [filing for bankruptcy continues to rise](#). Insolvent companies should not be able to shift their clean-up costs onto taxpayers and private landowners. The Government Accountability Office (GAO) has estimated that as many as [99 percent](#) of the bonds for wells currently operating on federal lands are insufficient for covering remediation costs if any of those wells were to become orphaned. In order to address the root cause of the problem, the Interior Department should eliminate nationwide bonding and increase individual and statewide bonding requirements, drawing on the provisions included in the bonding reform [bills](#) that Senator Bennett and Representative Lowenthal have both [introduced](#).
- Lastly, if leasing is to continue, oil and gas companies must start fairly compensating taxpayers for developing on the public lands that belong to all of us. Outdated fiscal rates are exploiting our public lands resources, and it is estimated that taxpayers [lost](#) up to \$12.4 billion in revenue from oil and gas drilling on federal lands from 2010 through 2019 due to the century-old royalty rate of 12.5 percent. GAO has stated that modernizing the oil and gas royalty rate could [increase](#) revenues to both federal and state governments by \$20 to \$38 million per year, and there is strong, [bipartisan](#) support in Congress for updating this rate as well as rental rates and minimum lease bids. The Interior Department should commit to bringing these rates up to account for the cumulative costs of development and to align with market rates.



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**From:** [Brent Greenfield](#)  
**To:** [Energy Review](#)  
**Cc:** [Jack Belcher](#); [etober@cgagroup.com](mailto:etober@cgagroup.com)  
**Subject:** [EXTERNAL] NOPC Comments on Federal Oil & Gas Program Review  
**Date:** Thursday, April 15, 2021 12:19:35 PM  
**Attachments:** [4.15.21 NOPC Letter to DOI.pdf](#)

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Attached please find comments to Secretary Haaland from the National Ocean Policy Coalition regarding the review of the federal oil and gas program.

Please let us know if you have any questions or if any additional information would be helpful.

Sincerely,  
Brent

Brent Greenfield  
National Ocean Policy Coalition  
(832) 706-4756  
[www.oceanpolicy.com](http://www.oceanpolicy.com)

**From:** [Max Sarinsky](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments from Institute for Policy Integrity for Report on Federal Oil and Gas Program  
**Date:** Thursday, April 15, 2021 11:29:11 AM  
**Attachments:** [Comments of Institute for Policy Integrity for Programmatic Review of Oil and Gas Leasing Program.pdf](#)

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Good Morning,

The Institute for Policy Integrity at New York University School of Law appreciates the opportunity to offer the attached comments to inform the Department of the Interior's interim report on the federal oil and gas program. Please feel free to reach out to me if I can be of further assistance.

Warm Regards,  
Max

Max Sarinsky | *Senior Attorney*  
**Institute for Policy Integrity**  
New York University School of Law

**From:** [Amelia Howe](#)  
**To:** [Energy Review](#)  
**Cc:** [Taylor Luneau](#)  
**Subject:** [EXTERNAL] DOI Federal Oil and Gas Program Comments  
**Date:** Thursday, April 15, 2021 11:16:34 AM  
**Attachments:** [AAC Oil + Gas Substantive Comment.pdf](#)

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To whom it may concern,

Thank you for the opportunity to share comments on the Department of the Interior's oil and gas development program. Please reach out with any questions or concerns.

We look forward to working with you on these matters moving forward.

Respectfully,  
Amelia Howe

--

**Amelia Howe** | Senior Policy Associate  
Pronouns: she, her, hers  
703.859.2719

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**From:** [Shanna Edberg](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Hispanic Access Foundation Comments on DOI Fossil Fuels Program Review  
**Date:** Thursday, April 15, 2021 10:49:02 AM  
**Attachments:** [HAF Oil and Gas review comment 4\\_15.pdf](#)

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Dear Secretary Haaland:

Thank you for this opportunity to provide feedback on the Department of the Interior's review of the federal oil and gas program. Our comment letter is attached.

Thanks again!  
Shanna

--

**Shanna Edberg (she/her/ella)**  
Director of Conservation Programs  
Hispanic Access Foundation  
(818) 640 2936  
1030 15th St., NW, Suite B/1 # 150  
Washington, DC 20005  
[hispanicaccess.org](http://hispanicaccess.org)



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**From:** [Alison Gallensky](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Information for Federal Oil and Gas Program Review  
**Date:** Thursday, April 15, 2021 10:43:55 AM  
**Attachments:** [Federal Oil and Gas Review Comments RMW final.pdf](#)

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Secretary Haaland and Staff,

Thank you for this opportunity to provide input into your review of the Federal Oil and Gas Program. Please find attached substantive comments prepared by the staff of Rocky Mountain Wild.

Please let me know if you have any questions or need additional information.

Best regards,  
Alison

--

**Alison Gallensky**  
Principal Conservation Geographer, Rocky Mountain Wild  
Denver, Colorado  
[alison@rockymountainwild.org](mailto:alison@rockymountainwild.org)  
(303) 546-0214 x 9 (303) 619-0509 (cell)  
Pronouns: she/her/hers

The new Colorado Oil and Gas Conservation Commission (COGCC) rules for oil and gas development increased protections of **12.7 million acres** of wildlife habitat! [Check out our interactive story map to visualize the changes.](#)



Rocky Mountain Wild's headquarters occupies the ancestral and traditional lands of the Arapaho, Cheyenne, and Nuu-  
agha-tuvu-pu (Ute) peoples. This area was also the site of trade, hunting, gathering, and healing of other Indigenous peoples, including the Comanche, Apache, and Shoshone. In offering this land acknowledgement, I affirm Indigenous sovereignty, history, knowledge, and experiences.

**From:** [Pete K](#)  
**To:** [Energy Review](#)  
**Cc:** [Molly Moore](#); [Jim Brett](#); [Pete K](#)  
**Subject:** [EXTERNAL] comments on US DOI fossil fuel program review from CO Farm & Food Alliance et al  
**Date:** Thursday, April 15, 2021 9:59:45 AM  
**Attachments:** [DOIreviewCOFFA.pdf](#)

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Please find attached our comments on the US Department of Interior review of its fossil fuels leasing and development programs. Thank you for the opportunity to provide comment.

Pete

Pete Kolbenschlag, Director

(970) 261 - 0678 cell  
(970) 510 - 6614

**Colorado Farm & Food Alliance**  
124 Grand Avenue ~ PO Box 641  
Paonia CO 81428

**ColoFarmFood.org**  
**@ColoFarmFood**  
on Twitter, Instagram, and Facebook

**From:** [Loomis, Becca](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comment submission for Interior Department interim report on the comprehensive review of the federal oil and gas program  
**Date:** Thursday, April 15, 2021 9:41:19 AM  
**Attachments:** [NRDC and Earthjustice comment for leasing interim report.pdf](#)

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Attached is a comment submission from the Natural Resources Defense Council and Earthjustice in response to the Interior Department's request for public comments to inform the interim report on the comprehensive review of the federal oil and gas program as called for in Executive Order 14008.

Many thanks,  
Becca Loomis

**REBECCA LOOMIS**  
*Legal Fellow, Oceans Division  
Nature Program*

NATURAL RESOURCES DEFENSE COUNCIL  
40 W 20TH STREET  
NEW YORK, NY 10011  
T 212.727.2700  
M 860.202.4340  
[RLOOMIS@NRDC.ORG](mailto:RLOOMIS@NRDC.ORG)  
[WWW.NRDC.ORG](http://WWW.NRDC.ORG)

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**From:** [Marnie Satterfield](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] IECA Comments on Public Forum on Federal Oil and Gas Program  
**Date:** Thursday, April 15, 2021 8:50:49 AM  
**Attachments:** [04.15.21 IECA Comments on DOI Public Forum on Federal Oil and Gas Program.pdf](#)

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Good Morning:

Please see attached for our comments on the DOI's public forum on Federal Oil and Gas Program.

Best,  
Marnie Satterfield  
Senior Government Affairs Manager  
Industrial Energy Consumers of America (IECA)  
1776 K Street, NW, Suite 720  
Washington, DC 20006  
(O) 202-223-1420  
(C) 703-350-7859  
[msatterfield@ieca-us.org](mailto:msatterfield@ieca-us.org)  
[www.ieca-us.org](http://www.ieca-us.org)



*The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.1 trillion in annual sales, over 4,200 facilities nationwide, and with more than 1.8 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, building products, automotive, brewing, independent oil refining, and cement.*

**From:** [Mark S Squillace](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Oil and Gas Forum Comments: Natural Resources Law Professors  
**Date:** Thursday, April 15, 2021 8:24:19 AM  
**Attachments:** [Oil.Gas.Forum.Law.Professor.Final.Comments.pdf](#)

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Attached please find comments from 19 natural resources law professors on the need for reform of the BLM's oil and gas policies. I would be grateful if you could confirm that these comments have been received and accepted.

Best regards, Mark Squillace

Mark Squillace, Raphael J. Moses Professor of Natural Resources Law  
University of Colorado Law School  
Office: 303-492-1287  
Mobile: 303-746-7831  
Webpage: <https://lawweb.colorado.edu/profiles/profile.jsp?id=189>  
My Personal Zoom Room: <https://cuboulder.zoom.us/my/marksquillace>

**From:** [cathy.gossett@shell.com](mailto:cathy.gossett@shell.com) on behalf of [Richard.Tallant@shell.com](mailto:Richard.Tallant@shell.com)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Department of Interior Review - Shell Comments  
**Date:** Thursday, April 15, 2021 8:21:58 AM  
**Attachments:** [04.14.2021.Shell.Comments.DOI.Review.Final.docx](#)

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Dear Secretary Haaland:

Please see the attached letter from Shell regarding the Department of the Interior's review of the federal oil and gas program. Thank you for the opportunity to provide our comments.

**Rick Tallant**

**Vice President – Gulf of Mexico**

Shell Energy Resources Company

One Shell Square, P. O. Box 61933, New Orleans, LA 70161-1933, United States of America

**Tel:** +1 504-425 6498

**Email:** [Richard.Tallant@shell.com](mailto:Richard.Tallant@shell.com)

**From:** [Wendy Kirchoff](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Submission of Comments for the Department's Review of the Federal Oil and Gas Program on behalf of AXPC  
**Date:** Wednesday, April 14, 2021 8:39:39 PM  
**Attachments:** [image003.png](#)  
[DOI Forum Federal Lands Development - AXPC Written Comments FINAL 4.15.2021.pdf](#)

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Please accept the attached comments on behalf of the American Exploration and Production Council (AXPC) for the Department of Interior's review of the federal oil and natural gas program. AXPC greatly appreciates the opportunity to provide these comments. Please do not hesitate to reach out if AXPC can be of additional service as the Department as it undergoes its review. We are happy to serve as a resource and look forward to working with you.

Sincerely,

**Wendy Kirchoff**

Vice President, Regulatory Policy

Direct: 202.920.1504 | Mobile: 281.386.7324



[www.axpc.org](http://www.axpc.org)

**From:** [Richard C. England](#)  
**To:** [Energy Review](#)  
**Cc:** [Erik Milito](#)  
**Subject:** [EXTERNAL] RE: NOIA: Comments Regarding Fossil Leasing Program  
**Date:** Wednesday, April 14, 2021 7:17:25 PM  
**Attachments:** [Milito\\_forum\\_2016\\_Nov\\_.pdf](#)  
[The-Economic-Impacts-of-the-Gulf-of-Mexico-Oil-and-Natural-Gas-Industry.pdf](#)  
[4.2021 NOIA Comments Oil and Gas Leasing.pdf](#)

---

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Good evening,

My apologies, but I am re-sending the document with the attachments mentioned in it.

Thanks,

Rich

*Richard C. England  
Vice President of Government Affairs  
National Ocean Industries Association  
Cell: (339) 298-1066*

---

**From:** Richard C. England  
**Sent:** Wednesday, April 14, 2021 7:03 PM  
**To:** [energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)  
**Cc:** Erik Milito <[milito@noia.org](mailto:milito@noia.org)>  
**Subject:** NOIA: Comments Regarding Fossil Leasing Program

Good morning,

I have attached comments from Erik Milito, President of the National Ocean Industries Association, in response to your [request](#) regarding the fossil fuel leasing program. We appreciate the opportunity to participate.

Thank you,

Rich

**Richard C. England**

**Vice President of Government Affairs**

National Ocean Industries Association

1120 G Street NW, Suite 900

Washington, DC 20005

[rengland@noia.org](mailto:rengland@noia.org)

Cell: (339) 298-1066



**From:** [Richard C. England](#)  
**To:** [Energy Review](#)  
**Cc:** [Erik Milito](#)  
**Subject:** [EXTERNAL] NOIA: Comments Regarding Fossil Leasing Program  
**Date:** Wednesday, April 14, 2021 7:07:02 PM  
**Attachments:** [4.2021 NOIA Comments Oil and Gas Leasing.pdf](#)

---

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Good morning,

I have attached comments from Erik Milito, President of the National Ocean Industries Association, in response to your [request](#) regarding the fossil fuel leasing program. We appreciate the opportunity to participate.

Thank you,

Rich

**Richard C. England**  
**Vice President of Government Affairs**  
National Ocean Industries Association  
1120 G Street NW, Suite 900  
Washington, DC 20005  
[rengland@noia.org](mailto:rengland@noia.org)  
Cell: (339) 298-1066



**From:** [Miya King-Flaherty](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Recommendations for the Review of the Federal Oil and Gas Leasing Program  
**Date:** Wednesday, April 14, 2021 6:26:54 PM  
**Attachments:** [Cover letter - video comment submission - DOI review of federal oil and gas leasing.pdf](#)

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**Attn: U.S Department of the Interior**

In response to the Department of Interior's review of the Federal Oil and Gas Leasing Program, this recorded press conference of frontline communities and environmental advocates in New Mexico serves as an official comment for providing feedback and input on what should be comprehensively reviewed.

Video link: <https://bit.ly/3scVrna>

Attached is a cover letter, that includes the video link and additional information, to go along with this submission.

Thank you very much,  
Miya King-Flaherty

--

Miya King-Flaherty - Our Wild New Mexico Organizing Representative  
(she/her/hers)  
Sierra Club: Rio Grande Chapter  
[www.riograndesierraclub.org](http://www.riograndesierraclub.org)  
2215 Lead Ave. SE, Albuquerque, NM 87106  
Cell (505) 301-0863

**From:** [T. Staples](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] TXOGA Comments on Federal Leasing Ban  
**Date:** Wednesday, April 14, 2021 5:51:57 PM  
**Attachments:** [image002.png](#)  
[image001.png](#)  
[4.14.2021 - Biden Admin - Public Comments on Federal leasing ban.pdf](#)

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April 14, 2021

The Honorable Deb Haaland  
Secretary of the Interior  
United States Department of the Interior  
1849 C Street NW  
Washington DC 20240  
[energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)

Dear Secretary Haaland:

The Texas Oil and Gas Association (TXOGA) is a statewide trade association representing every facet of the Texas oil and natural gas industry, including small independents and major producers. Collectively, the membership of TXOGA produces in excess of 80 percent of Texas' crude oil and natural gas, operates over 80 percent of the state's refining capacity, and is responsible for the vast majority of the state's pipelines.

The Biden Administration's decision to impose a moratorium on new federal oil and natural gas leases would be detrimental to domestic production of the nation's leading sources of energy, posing significant consequences for the Texas and American people. Jobs, communities and economies in Texas and nationwide are at risk, as is our national and energy security and the tremendous environmental progress being made by our domestic oil and natural gas industry.

In September of last year, TXOGA, the Louisiana Mid-Continent Oil and Gas Association (LMOGA) and the American Petroleum Institute (API) released an analysis warning of a leasing ban's negative consequences. The offshore operations in the Gulf of Mexico account for over 15 percent of U.S. oil production, and research indicates local economies in the Gulf Coast region would be among the hardest hit areas. In Texas, \$65 million in government revenues would be lost annually from the Land and Water Conservation Fund, and 120,000 jobs would be eliminated by 2022.<sup>[1]</sup> Across the Gulf Coast and on America's federal onshore lands, the impacts are even more devastating.

Not only has our nation's domestic oil and natural gas industry had a significant economic impact on local communities, states and our entire nation, this industry is a leading investor in zero and low-carbon technology, investing more than \$108 billion between 2000-2016, which is more than double

the investments of each of the next two industries.<sup>[2]</sup> As a result, Americans are breathing the cleanest air in decades and the U.S. leads the world in reducing energy-related carbon dioxide emissions. Methane emissions rates were down nearly 70 percent in five of the nation's largest oil and natural gas producing regions between 2011 and 2019, according to data from EPA and EIA. Studies show that restricting oil and natural gas development could actually *increase* U.S. carbon dioxide emissions, which have declined largely due to the increased use of clean natural gas. Under a federal leasing ban, U.S. carbon dioxide emissions could increase by an average of 58 million metric tons and keep rising to represent a 5.5 percent increase in the power sector by 2030.<sup>[3]</sup> Why would we want to undermine undeniable environmental progress?

Claims related to emissions benefits from banning development are off base. In fact, a 2016 Obama-Biden Administration report found that carbon dioxide emissions from production in the U.S. outer continental shelf are less, per barrel of oil, than overseas production.<sup>[4]</sup> As America's energy leader, Texans know we should not pursue an energy strategy that increases our nation's dependence on foreign oil and decreases U.S. energy security.

The oil and natural gas industry is producing energy in cleaner and more efficient ways than 10 to 15 years ago all while producing more affordable and reliable energy to power our daily lives. Innovations in oil and natural gas development will continue to lead the way in environmental progress and smart, science-based policies must be in place to ensure a cleaner, stronger and better energy future that includes the fuels, power and products every American needs.

While oil prices plummeted in the wake of the pandemic, the need for products made from oil and natural gas skyrocketed. Nearly every in-demand product we need to be safe, to save lives and to power our economy – from face shields and hand sanitizers to high-speed internet connections and computers – is made possible by oil and natural gas. Even before the pandemic, 96 percent of products we use every day like pharmaceuticals, electronics, cosmetics and clothing are made from oil and natural gas. There is no substitute for oil and natural gas in our lives or our economy.

Banning energy development on federal lands and in offshore waters not only threatens thousands of the best-paying jobs, but needlessly erases revenue that helps pay for schools and other essential services. In fiscal year 2020, the Texas oil and natural gas industry employed more than 400,000 Texans in direct jobs and paid \$13.9 billion in state and local taxes and state royalties, funding our state's schools, roads and first responders.<sup>[5]</sup> This total equates to about \$38 million a day that are put to work for every Texan. These dollars are vital in support of counties and cities, our state's Economic Stabilization Fund (commonly known as the Rainy Day Fund), the Permanent School Fund, and the Permanent University Fund. Billions more are paid in salaries that greatly improve the standard of living of millions of Texans.

In 2019, the sum of the direct Gross State Product (GSP) contributions of the 14 sectors that comprise the Texas oil and natural gas industry was over \$223 billion, and the indirect effects are even larger. For example, refineries may be producing billions of dollars of economic output on their own, but they are also purchasing from their suppliers large amounts of pipe, electricity, engineering services, construction materials, catalysts, and other goods and services, each of which further contributes to GSP. Even more, the Texans who work in the oil and natural gas industry and the industry's suppliers spend their earnings in local economies for housing, food, household and medical services, entertainment, clothing, and the like. In 2019, the combined direct and indirect effect of the Texas oil and natural gas industry was more than \$502 billion – a whopping 30.5 percent of Texas' GSP.

American oil and natural gas is safe, clean and abundant, and Texas industry has committed to lowering both methane emissions and ending routine flaring of natural gas.<sup>[6]</sup> Misguided policies will only stifle our nation's energy and environmental progress. Today, Texans and American enjoy more energy security than ever and domestic energy is powering economic prosperity and environmental improvements here at home and around the world. This progress – and ways to build on it – must be part of more rational discussions about the future of our energy, our environment and our economy.

Proposals to ban U.S. energy production are wrong for the economic, environmental and security outcomes Texans and all Americans deserve and are out of step with bipartisan support for an all-of-the-above energy approach. Our energy choices do not have to be either/or. American energy development is safe and sustainable, and needlessly restricting this development is irresponsible. Oil and natural gas will be a part of our cleaner energy future and we urge the Administration to reverse its ban on new federal oil and natural gas leases.

Sincerely,



Todd Staples  
President  
Texas Oil and Gas Association

*Todd Staples*

*President*

***Texas Oil & Gas Association***

*304 W. 13<sup>th</sup> Street*

*Austin, Texas 78701*

*512-617-8890 Direct*

*512-478-6631 Main*

[www.txoga.org](http://www.txoga.org)

**The mission of the Texas Oil & Gas Association is to promote a robust oil and natural gas industry and to advocate for sound, science-based policies and free-market principles.**



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[1] <https://www.txoga.org/8389-2/>

[2] [https://www.api.org/-/media/Files/EHS/climate-change/2017\\_API\\_GHG\\_Investment\\_Study.pdf?la=en&hash=38AD928F21C04A9A1E0650D999EEF5F03378F31D](https://www.api.org/-/media/Files/EHS/climate-change/2017_API_GHG_Investment_Study.pdf?la=en&hash=38AD928F21C04A9A1E0650D999EEF5F03378F31D)

[3] [https://www.api.org/~media/Files/News/2020/09/Consequences\\_of\\_a\\_Leasing\\_and\\_Development\\_Ban\\_on\\_Federal\\_Lands\\_and\\_Waters.pdf](https://www.api.org/~media/Files/News/2020/09/Consequences_of_a_Leasing_and_Development_Ban_on_Federal_Lands_and_Waters.pdf)

[4] <https://www.boem.gov/sites/default/files/oil-and-gas-energy-program/Leasing/Five-Year-Program/2017-2022/OCS-Report-BOEM-2016-065---OCS-Oil-and-Natural-Gas---Potential-Lifecycle-GHG-Emissions-and-Social-Cost-of-Carbon.pdf>

[5] <https://www.txoga.org/texas-oil-and-natural-gas-industry-paid-13-9-billion-in-taxes-and-state-royalties-in-fiscal-year-2020/>

[6] Texas Methane and Flaring Coalition Announces Goal of Ending Routine Flaring by 2030  
<https://texasmethaneflaringcoalition.org/texas-methane-flaring-coalition-announces-goal-of-ending-routine-flaring-by-2030/>

**From:** [Mallory Huggins](#)  
**To:** [Energy Review](#)  
**Cc:** [Kelly, Katherine P](#); [Culver, Nada L](#); [Alonso, Shantha R](#); [laura\\_davis@ios.doi.gov](mailto:laura_davis@ios.doi.gov)  
**Subject:** [EXTERNAL] Comments to inform DOI's interim report on federal oil and gas leasing program  
**Date:** Wednesday, April 14, 2021 5:37:26 PM  
**Attachments:** [Inclusive Stakeholder Engagement in Practice - Guidance for the Department of Interior.pdf](#)

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Secretary Haaland and DOI staff,

I serve as a third-party, independent facilitator for the People, Public Lands, and Climate Collaborative. On behalf of many members of that Collaborative, I'm attaching feedback regarding DOI's review of the federal oil and gas program.

Thank you for the opportunity to provide feedback.

Respectfully,  
Mallory Huggins

Mallory Huggins (she/her)  
Senior Project Director  
Director, Keystone Energy Board  
Keystone Policy Center  
Washington, DC-based team  
Phone: (303) 947-7013  
Skype: malloryhuggins  
[www.keystone.org](http://www.keystone.org)

**From:** [Tripp Parks](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Western Energy Alliance Comments on the Federal Oil and Natural Gas Program Review  
**Date:** Wednesday, April 14, 2021 5:06:10 PM  
**Attachments:** [Western Energy Alliance Comments on the DOI Review of the Federal Oil and Natural Gas Program.pdf](#)

---

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Good afternoon,

Attached please find comments from Western Energy Alliance on the Department of the Interior's ongoing review of the federal onshore oil and natural gas program. Please do not hesitate to contact me with any questions.

Tripp Parks  
Vice President of Government Affairs  
Western Energy Alliance

**From:** [Fennessey, Karl](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] ConocoPhillips" Response to Public Forum on Federal Oil and Gas Program  
**Date:** Wednesday, April 14, 2021 4:11:50 PM  
**Attachments:** [ConocoPhillips Letter.pdf](#)

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Attached is ConocoPhillips' input to the Department of the Interior's public forum on the federal oil and gas program.

Thank you for the opportunity to give input.

Karl Fennessey  
ConocoPhillips  
925 N. Eldridge Pkwy  
Houston, TX 77079

**From:** [Peter Nelson](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Input: Review of federal oil and gas program  
**Date:** Wednesday, April 14, 2021 3:53:49 PM  
**Attachments:** [DOW Comments DOI OG Review.pdf](#)

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Thank you for the opportunity to provide input (attached) into the Department of Interior's forthcoming review of the federal fossil fuel program. Founded in 1947, Defenders of Wildlife is a national conservation organization with nearly 2.2 million members and supporters focused on conserving wildlife and safeguarding biodiversity. We applaud the Department for conducting this review and committing to evaluate and address the contribution of federal fossil fuel activities to climate change and its effects on US lands, waters, and people.

Sincerely,  
Peter Nelson



**Pete Nelson**

Director, Federal Lands Program

**[DEFENDERS OF WILDLIFE](#)**

514 E. Cottonwood St., Bozeman MT, 59715

TEL: 206.290.0267

[Facebook](#) | [Twitter](#) | [Instagram](#) | [Medium](#)

Visit <https://defenders.org>!

**From:** [Paul Selberg](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Public Comment - DOI Pause of oil and gas leasing on public lands  
**Date:** Wednesday, April 14, 2021 2:52:45 PM  
**Attachments:** [Oil and Gas comments.pdf](#)

---

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Hello -

Please find our public comments attached to this email.

Thank you,  
Paul Selberg

--

Paul Selberg  
Nevada Conservation League and Education Fund  
Executive Director  
c: 515-210-1632  
[paul@nevadaconservationleague.org](mailto:paul@nevadaconservationleague.org)  
[www.nevadaconservationleague.org](http://www.nevadaconservationleague.org) | [www.protectnv.org](http://www.protectnv.org)

**From:** [Alex Daue](#)  
**To:** [Energy Review](#)  
**Cc:** [Culver, Nada L](#); [Alonso, Shantha R](#); [Kelly, Katherine P](#)  
**Subject:** [EXTERNAL] Recommendations on the Interior Department's review of the federal onshore oil and gas program  
**Date:** Wednesday, April 14, 2021 2:16:00 PM  
**Attachments:** [ECT sign-on letter FINAL.pdf](#)

---

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Hello,

Please accept the attached comment letter on behalf of the organizations signed on to it. We appreciate the opportunity to comment.

Sincerely,

**Alex Daue (he/him/his)**  
Assistant Director, Energy & Climate  
**The Wilderness Society | The Wilderness Society Action Fund**  
ph 720-647-9369  
1660 Wynkoop St # 1150, Denver, CO 80202

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**From:** [Pete Erickson](#)  
**To:** [Energy Review](#)  
**Cc:** [Ploy Pattanun Achakulwisut](#); [Michael Lazarus](#)  
**Subject:** [EXTERNAL] Federal oil & gas program  
**Date:** Wednesday, April 14, 2021 1:05:00 PM  
**Attachments:** [Koski et al. - 2019 - Principles for aligning US fossil fuel extraction .pdf](#)  
[Erickson and Lazarus - 2018 - Would constraining US fossil fuel production affect PGR2020 ExecSum .web.pdf](#)

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Dear Department of Interior oil & gas review team (via email to [energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)):

Thank you for the opportunity to submit information concerning Interior's review of the federal oil and gas program.

We write to provide three resources that we have authored (together with other researchers), which may be useful as you consider the climate change implications of Interior's oil and gas program.

1. **A report, titled "Principles for aligning US fossil fuel extraction with climate goals"**, that considers how federal policymakers could bring the management of oil, gas, and coal extraction in line with the U.S. government's commitments under the Paris Agreement, especially in light of local and global equity considerations. We advance three principles: (1) reduce fossil fuel production at a pace consistent with climate protection; (2) accelerate the phase-out where economies are most resilient; and (3) safeguard human rights and public health, cultural resources and the local environment. The report is attached and is also available here: <https://www.sei.org/publications/principles-for-aligning-fossil-fuel-extraction-with-climate-limits/>
2. **An academic article, titled "Would constraining US fossil fuel production affect global CO2 emissions? A case study of US leasing policy"**, that analyzes, using economic models, how stopping new federal leasing of oil, gas, and coal would affect global CO2 emissions. This article is attached and also available in the scientific journal *Climatic Change*, here: <https://link.springer.com/article/10.1007/s10584-018-2152-z>
3. **An annual report series, the Production Gap Report**, co-authored by dozens of leading researchers worldwide in partnership with the United Nations Environment Program (UNEP), that compares countries' aggregated plans and projections of oil, gas, and coal production to the declines in each fuel that would instead be consistent with the Paris Agreement's goals of limiting warming to below 1.5C or well-below 2C. An update to this report, planned for autumn 2021, will include a country profile on the United States. The executive summary to the 2020 report is attached, and the full report is available at <http://productiongap.org/2020report>. Chapter 4 of the 2020 report discusses principles for

aligning global fossil fuel extraction with respect to countries' respective capabilities.

We would be happy to answer questions about these documents or engage in additional, new research on these topics. Our organization, SEI, is an international research institution affiliated with Tufts University and with offices in Somerville, MA; Seattle, WA; and Davis, CA.

Thank you again for this opportunity.

Very best regards,  
Peter Erickson, Ploy Achakulwisut, and Michael Lazarus

**From:** [Annette Pitera](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Letter to Sec. Deb Haaland on Federal Leasing Ban on Drilling 041421  
**Date:** Wednesday, April 14, 2021 11:37:58 AM  
**Attachments:** [image001.png](#)  
[Letter to Sec. Deb Haaland on Federal Leasing Ban on Drilling 041421.pdf](#)

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Good morning,

Please find attached a letter addressed to Sec. Deb Haaland from Ernie C'deBaca, President/CEO of the Albuquerque Hispano Chamber of Commerce, on the federal leasing ban on drilling and its negative impact on New Mexico.

Kind regards,  
Annette

Annette Pitera  
Executive Assistant  
The Albuquerque Hispano Chamber of Commerce  
505-462-2256  
[annette@ahcnm.org](mailto:annette@ahcnm.org)



**From:** [Jessica Pace](#)  
**To:** [Energy Review](#)  
**Cc:** [Gwen Lachelt](#)  
**Subject:** [EXTERNAL] Comment on Federal O&G Review from Western Leaders Network  
**Date:** Wednesday, April 14, 2021 10:15:21 AM  
**Attachments:** [WLN Letter to Secretary of the Interior, O&G Reform, 4-14-21.pdf](#)

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Good morning,

Please find attached a letter from [Western Leaders Network](#), a nonpartisan nonprofit organization of 450 local and tribal elected officials across the Interior West, expressing support for the federal oil and gas program review and offering recommendations on reforms.

Thank you for considering our comments,

Jessica Pace

--

Jessica Pace  
Program Coordinator  
Western Leaders Network  
PO Box 4433  
Durango CO 81302  
615-294-2049  
[www.westernleaders.org](http://www.westernleaders.org)  
[www.facebook.com/WestLeaders/](https://www.facebook.com/WestLeaders/)  
<https://twitter.com/WestLeaders>

**From:** [Camilla Simon](#)  
**To:** [Energy Review](#)  
**Cc:** [Alonso, Shantha R](#)  
**Subject:** [EXTERNAL] HECHO Local and State Leaders Letter Supporting Oil and Gas Reform  
**Date:** Tuesday, April 13, 2021 7:29:50 PM  
**Attachments:** [image002.png](#)  
[HECHO Local and State Leaders Sign-on Letters 04 13 2021.pdf](#)

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Dear Secretary Haaland,

Thank you for the opportunity to submit comments to inform the Department of the Interior's interim report of the federal oil and gas program as called for in Executive Order 14008. To that effect, I am attaching a letter signed by 28 local and state elected officials (and former elected officials) who support reforming the federal oil and gas program. This letter outlines key policy reforms that we believe will help put us on the right path toward better stewardship of our public lands.

Respectfully,  
Camilla

---

## **Camilla Simon**

Executive Director, HECHO  
she/her/ella  
email [camilla@HechoOnline.org](mailto:camilla@HechoOnline.org)



[www.HechoOnline.org](http://www.HechoOnline.org) | [@HechoOnline](#) | [#Latinos4Conservation](#)

**Hispanics Enjoying Camping, Hunting, and the Outdoors (HECHO)** was created to help fulfill our duty to conserve and protect our public lands for future generations. We provide a platform for

Hispanics/Latinos to contribute knowledge and perspectives about public land conservation. From southwestern deserts to northern forestland, Hispanics/Latinos throughout America have a strong connection to our nation's diverse landscapes. We urge our elected and appointed leaders to safeguard our precious public lands, so that our children can enjoy fishing, hiking, hunting, camping, and other outdoor activities for generations to come.

**From:** [Brian Miller](#)  
**To:** [Energy Review](#)  
**Cc:** [Brian Miller](#); [Chris Romer](#)  
**Subject:** [EXTERNAL] Public Comments Submitted in Relation to Ex. Order 14008  
**Date:** Tuesday, April 13, 2021 6:24:00 PM  
**Attachments:** [Project Canary Public Comments on EX Order 14008 .pdf](#)

---

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To Whom it May Concern,

Please find attached comments from our organization in relation to Executive Order 14008.

Please confirm receipt of this email and let me know if you have questions.

Sincerely,  
Brian Miller

--

**Brian W. Miller**

**Vice President, Growth & Policy**

**Project Canary** *an Intl. Environmental Standards Company*

(202) 669-3801

1700 Lincoln St., 14th Floor, Denver, CO 80203

**From:** [Bill Novotny](#)  
**To:** [Energy Review](#)  
**Cc:** [Bailey Brennan](#); [jrieman@wyo-wcca.org](mailto:jrieman@wyo-wcca.org)  
**Subject:** [EXTERNAL] Johnson County Comments on EO14008  
**Date:** Monday, April 12, 2021 5:05:24 PM  
**Attachments:** [DOI Executive Order 14008 Letter.pdf](#)

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Please find Johnson County Wyoming's comments attached.

Thank you!

**Bill Novotny, III**

Chairman, Johnson County Board of Commissioners

76 North Main Street

Buffalo, WY 82834

Office (307) 684-7555

Cell (307) 620-2642

@bnovotny3

[www.johnsoncowy.us](http://www.johnsoncowy.us)

**From:** [Mike Hyde](#)  
**To:** [Energy Review](#)  
**Cc:** [Travis Campbell](#); [Kathleen Sgamma](#); [Rikki Hrenko-Browning](#); [Carolyn Phippen@lee.senate.gov](#); [Crozier, Clay \(Romney\)](#); [Jake Garfield](#)  
**Subject:** [EXTERNAL] Comment letter from Duchesne County, Utah  
**Date:** Monday, April 12, 2021 3:06:55 PM  
**Attachments:** [DOC241.pdf](#)

---

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Department of Interior staff:

Please add the attached letter to your record.

--

Mike Hyde, AICP  
Duchesne County  
Community Development Director  
PO Box 317  
Duchesne, UT 84021-0317  
435-738-1151  
Fax: 435-738-5522  
[mhyde@duchesne.utah.gov](mailto:mhyde@duchesne.utah.gov)

**From:** [Dustin Renaud](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] RE: Comments on the Federal Fossil Fuel Program Review  
**Date:** Friday, April 9, 2021 5:29:41 PM  
**Attachments:** [FINAL Letter from Gulf Advocates to Biden"s Climate Taskforce and associated agencies.pdf](#)

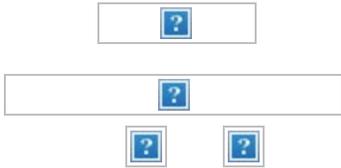
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On behalf of over 50 Gulf advocate organizations, I would like to submit this comment on the Federal Fossil Fuel Program Review as a part of the followup from President Biden's Executive Action #14008.

Please see attached PDF and let me know if you have any trouble viewing it. I can send in any format that you may need.

In solidarity,



**Dustin Renaud**

Communications Director

504 525 1528 x214  
228 209 2194 (Cell)  
PO BOX 2245  
New Orleans, LA 70176

**Protect What You Love**

**From:** [Melissa Parks](#)  
**To:** [Energy Review](#)  
**Cc:** [Peter Baker](#); [Ken Rait](#)  
**Subject:** [EXTERNAL] Comments on DOI's Federal Oil and Gas Program  
**Date:** Thursday, April 8, 2021 8:19:15 PM  
**Attachments:** [Pew DOI Comments Public Forum 9Apr21.pdf](#)

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Thank you for the opportunity to provide comments on the Department of the Interior's Oil and Gas program. Attached are comments from The Pew Charitable Trusts.

Sincerely,  
Melissa Parks

**Melissa Parks**  
Senior Associate, U.S. Arctic  
The Pew Charitable Trusts  
p: 206-472-3768 | e: [mparks@pewtrusts.org](mailto:mparks@pewtrusts.org)

**From:** [Brad Baker](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Federal Oil and Gas Review  
**Date:** Tuesday, April 6, 2021 5:12:56 PM  
**Attachments:** [US Dept of Interior Ltr.pdf](#)

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Please see attached.

Thank you.

Brad Baker  
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[brad@chickasawdistributors.com](mailto:brad@chickasawdistributors.com)  
(Houston Office) 713/974-2905  
(Tulsa Office) 918/288-2603  
(Mobile) 918/519-3842

**From:** [Mike Bremer](#)  
**To:** [Energy Review](#); [Mike Bremer](#)  
**Subject:** [EXTERNAL] Comments on Federal Oil and Gas Program responding to March 25, 2021 DOI Forum  
**Date:** Tuesday, April 6, 2021 10:23:35 AM  
**Attachments:** [dlogmhmkbkmkjpkb.png](#)  
[DOI Letter.GC - 077 452021.pdf](#)

---

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Attached is a letter providing comments on the Federal Oil and Gas program.

--

*J. Michael Bremer*

*Tribal Historic Preservation Officer*

*Pueblo de San Ildefonso*

*02 Tunyo Po*

*Santa Fe, NM 87506*

*505-455-4148 (Office)*

*505-231-6375 (Cell)*



**From:** [Prest, Brian](#)  
**To:** [Energy Review](#)  
**Cc:** [James Stock](#)  
**Subject:** [EXTERNAL] Interior Leasing Review Submission  
**Date:** Monday, March 29, 2021 1:11:57 PM  
**Attachments:** [Prest Stock 2021 - NBER.pdf](#)  
[Prest Interior panel remarks.pdf](#)

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Hello,

Thank you for the opportunity to present at last week's Virtual Forum. I would like to submit (1) a copy of my written remarks from the forum and (2) a copy of the recent NBER paper I referenced in those remarks.

Please feel free to reach out to myself and my co-author Jim Stock (cc'ed) with any questions. We are eager to provide further analytical support on how economically sound leasing policy can use climate royalty surcharges to incorporate "climate costs", reduce emissions, and raise revenues.

Brian

**Brian Prest**

**Fellow, Resources for the Future**

1616 P St NW, Suite 600 • Washington, DC 20036 • 202.238.5109 • [prest@rff.org](mailto:prest@rff.org) • [@bprest](https://twitter.com/bprest)

**Support RFF** to improve environmental, energy, and natural resource decisions.

**From:** [Victoria Ekstrom High](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Recommendations from the Univ of Chicago  
**Date:** Wednesday, March 24, 2021 9:37:44 PM  
**Attachments:** [Oil-and-Gas-Resources.pdf](#)

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To whom it may concern,

I'd like to submit the attached recommendations for reforms to the oil and gas leasing program. These recommendations are made by Thomas Covert and Ryan Kellogg, professors at the University of Chicago. The recommendations are part of a larger book of policy recommendations released by the Energy Policy Institute at the University of Chicago. The full book can be found at: <https://epic.uchicago.edu/us-energy-and-climate-roadmap/>. I have attached the appropriate chapter for your review and consideration.

Please feel free to reach out with any questions.

Many thanks,  
Vicki

---

Vicki Ekstrom High  
Sr. Director, Communications & External Engagement  
Energy Policy Institute at the University of Chicago (EPIC)  
781-789-3078

**From:** [Dan Naatz](#)  
**To:** [Energy Review](#)  
**Cc:** [Dan Naatz](#)  
**Subject:** [EXTERNAL] Comments of the Independent Petroleum Association of America (IPAA)  
**Date:** Wednesday, March 24, 2021 2:28:43 PM  
**Attachments:** [IPAA Statement DOI Forum March 2021.pdf](#)

---

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To Whom It May Concern:

Attached are the comments of Barry Russell, President and CEO of the Independent Petroleum Association of America (IPAA), regarding the "Fossil Fuels Program Review Forum" on March 25<sup>th</sup>. Please also see the enclosed link to a study entitled "The Economic Contribution of Independent Operators in the United States," completed by IHS Markit in 2019.

<https://www.ipaa.org/wp-content/uploads/2019/05/IPAA-Economic-Contribution-Final-Report.pdf>

-

Thank you for your attention to this matter.

Dan Naatz  
Sr. Vice President  
Government Relations & Political Affairs  
IPAA

**From:** [Appel, Elizabeth K](#) on behalf of [Consultation, IA](#)  
**To:** [Katie E. Klass](#); [Energy Review](#)  
**Cc:** [Governor](#); [Ben Chavarria](#); [Danny D. Naranjo](#); [aberlylaw@swcp.com](mailto:aberlylaw@swcp.com)  
**Subject:** Re: [EXTERNAL] Santa Clara Pueblo Comments on Oil and Gas Permitting and Leasing Program  
**Date:** Friday, April 23, 2021 12:57:54 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Thank you for your comments. We will be reviewing them closely.

---

**From:** Katie E. Klass <KKlass@hobbsstrauss.com>  
**Sent:** Thursday, April 15, 2021 1:25 PM  
**To:** Consultation, IA <consultation@bia.gov>; Energy Review <energyreview@ios.doi.gov>  
**Cc:** Governor <governor@santaclarapueblo.org>; Ben Chavarria <bchavarria@santaclarapueblo.org>; Danny D. Naranjo <ddnaranjo@santaclarapueblo.org>; aberlylaw@swcp.com <aberlylaw@swcp.com>  
**Subject:** [EXTERNAL] Santa Clara Pueblo Comments on Oil and Gas Permitting and Leasing Program

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Attached please find comments from the Santa Clara Pueblo related to the Department's comprehensive review under Executive Order 14008 of the oil and gas permitting and leasing program.

In a Dear Tribal Leader Letter dated March 15, 2021, the Department invited tribes to participate in a tribal consultation on ways to improve the Department's support for developing tribal renewable and conventional energy resources. The Department also invited the public to participate in a public forum on the federal oil and gas program and stewardship of public lands. The Pueblo submits the attached comments in response to both commenting opportunities.

Thank you.

Katie

**Katie E. Klass, Partner**

T 202.822.8282 | F 202.296.8834

**HOBBS STRAUS DEAN & WALKER, LLP**

1899 L Street NW, Suite 1200, Washington, DC 20036

**HOBBSSTRAUS.COM**



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All "outgoing" email for Hobbs Straus is scanned, tested, and verified using Proofpoint Essentials.

**From:** [YUCCA@EarthCare](mailto:YUCCA@EarthCare)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Public Comment Federal Oil and Gas Program  
**Date:** Friday, April 16, 2021 12:27:34 AM

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Two years ago young people throughout New Mexico, throughout this Nation, and throughout the world called on our elected officials to ACT on climate change before our futures are destroyed. Two years ago millions of young people stood up and demanded action. With due respect, we are still waiting for our call to be answered.

Leadership means facing hard realities and developing solutions. The harsh reality in New Mexico is that the generations that have come before us have built an economy that is dependent on an industry that is killing us. Oil and gas revenues comprise 40% of the state's budget. That \$ is the result of an extractive industry that is producing climate emissions for NM at two times the national average. The Permian Basin if fully extracted could be the tipping point that sends us over the cliff of runaway climate disruption. We are already terrified in a year that saw California, and now Wisconsin up in flames and Texas frozen.

Some people say that we should not bite the hand that feeds us - but that is a colonial and oppressive way of thinking of the situation. And in fact - the idea that these extractive industries have benefited us is a lie. [Our communities don't see oil and gas as the savior](#) some politicians do. New Mexico ranks #3 for oil and gas but has the WORST public education in the nation with the HIGHEST rates of childhood hunger and welfare. NM ranks lowest in the nation for public education and childhood well-being. We've allowed our state budget to be so reliant on this boom and bust industry that New Mexico ranks at the bottom for [fiscal stability \(#47\)](#), [economy \(#47\)](#), and [education \(#49\)](#). Our state continues to subsidize the industry paying the costs in the form of public health - extracted from the [more than 115,000 New Mexicans live within one mile of an oil and gas well](#) or the 1.2 million New Mexicans breathe dangerous levels of air pollution. We pay in the form of air pollution which we've seen raises [severe symptoms and death from COVID-19](#). We pay in the form of climate costs which [economic studies](#) have estimated at \$1.6 BILLION each year including \$300 million to farmers and rangers alone. We pay in waste - the oil and gas industry spills, explodes, and leaks toxic waste an average of more than 4 times/day. Over 10,000 miles of potentially radioactive pipeline are buried in NM. There are roughly [60,000 active oil and gas wells already in New Mexico](#) with 700+ abandoned wells and growing. [Estimates of fracking clean](#)

[up exceed \\$3 billion](#), but NM only has \$17 million in reclamation bonds from industry. We pay in water - New Mexico's water supplies projected to decline 20% due to climate change. We pay in our future -- with drought and wildfire threats increasing yearly. We are done paying for the short-sighted decisions of those in power.

New Mexico is a perfect example of how fraudulent the promise of oil and gas industry is.

We cannot continue to dig our heads in the sand and ignore the present and pending reality that

**We cannot keep fracking.**

**Extracting.**

**We cannot continue poisoning our waters.**

**We cannot continue exploiting Indigenous, sacred, lands.**

**We cannot continue sacrificing the bodies of those on the frontlines.**

**We cannot continue to pay for the collateral damage of industry in public health crises and tax dollars.**

**We cannot continue to make excuses for and paying to cleanup after industry**

**We cannot continue to accept mancamps and the kidnapping and murder of Indigenous women**

**We cannot continue the sacrifice of whole species**

**Of future generations of MY generation**

For too long we have been asking - Why is nothing being done to protect us? Why have our decision-makers prioritized their relationship to industry over their responsibility to their children? Why can't the adults find the courage?

For we as young people know what needs to be done. We know that we have to find a way to leave remaining fossil fuels in the ground. We know we have to value our water. We know we have to value the health of Indigenous and other frontline communities. We know we have to value our futures. And we know we have to respect what science is telling us.

Which is that we have 9 years left to reverse course and change the foundation of our economy. We have nine years left. Please take action now to save our future.

We share the words of our beloved Secretary Haaland - who recently issued the following statement on the droughts in the West. The federal government cannot claim to care about issues like drought and then continue to allow for fossil fuel extraction on public lands. It is your duty to find sustainable and beneficial uses for these lands that are in the public interest and do not come with the devastating cost of climate catastrophe -- drought, wildfires, flooding, and billions in property damages, public health, and the unquantifiable and unforgivable loss of human life and biological diversity. Please uphold your responsibility to our generations and the generations to follow.

“Water is a sacred resource essential to feeding families, growing crops, sustaining wildlife and the environment, and powering agricultural businesses. Unfortunately, drought conditions in the West continue to worsen, including in areas like the Klamath River Basin, leading to the potential for historically low water allocations. The Departments of the Interior and Agriculture recognize the urgency of this crisis and its impacts on farmers, Tribes, and communities, and are committed to an all-hands-on-deck approach that both minimizes the impacts of the drought and develops a long-term plan to facilitate conservation and economic growth. Our agencies are actively working with Oregon, California and other western states to coordinate resources and identify immediate financial and technical assistance for impacted irrigators and Tribes. We are also committed to robust and continued engagement with state, local, and Tribal governments to develop longer term measures to respond to climate change and improve water security.” <https://www.doi.gov/news/joint-statement-interior-secretary-deb-haaland-and-agriculture-secretary-tom-vilsack-western>

**YUCCA's mission is to organize a youth-led intergenerational & intersectional grassroots climate justice movement in NM that is powerful enough to hold leaders accountable and force the passage of climate policies that address the science, move us swiftly and justly toward carbon neutrality, and end our abusive dependence on fossil fuel extraction.**

For more information visit [www.youthunited4climatecrisis.org](http://www.youthunited4climatecrisis.org)

**From:** [Rhonda Tigner](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Fossil Fuels Program Review Virtual Forum  
**Date:** Thursday, March 25, 2021 9:15:52 AM

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Good Morning,

Below please find some questions for the upcoming forum this afternoon:

1. Will a two year extension still be granted for an APD that is due to expire? Why does this action need to be handled at the DC level? Is there going to be more information or data required for an extension request?
2. Will downhole sundry actions be handled at the field office level or the BLM State office?
3. What is the reason behind moving permit approvals to the BLM State office level?
4. Will an operator be able to communicate with the State BLM office if a permit has not been approved and timing is such that an approval is needed to meet rig schedules or lease schedules? (Will the APD approval timeframe remain as it has been in the past?)
5. Will this be the new normal for APD submittals and processes or is this a short-term agenda?

Thank you and I look forward to the meeting this afternoon.

*Rhonda K. Tigner*

Senior Regulatory Analyst  
[rtigner@impact-ep.com](mailto:rtigner@impact-ep.com)

Impact Exploration & Production, LLC.  
8101 East Prentice Avenue  
Suite 700  
Greenwood Village, CO 80111  
Direct/Cell: 307.431.2291  
Fax: 307.347.4276



**From:** [Sharma, Prianka P.](#)  
**To:** [Energy Review](#)  
**Cc:** [Patnaik, Bivan R](#)  
**Subject:** [EXTERNAL] Availability of Comments Received, Fossil Fuels Program Review  
**Date:** Thursday, March 25, 2021 4:45:26 PM  
**Attachments:** [image003.png](#)

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Good afternoon,

I'm writing to inquire whether comment received from this solicitation for information will be published in the federal register or regulations.gov for review by the public and other agencies. It would also be helpful to know if the agency plans to do specific small business outreach as the public forum today did not have specific small business representatives on the panels.

Thank you,  
Prianka

---

Prianka P. Sharma  
Assistant Chief Counsel  
Agriculture, Energy, and Natural Resource Policy  
**SBA Office of Advocacy**  
(202) 205-6938 (direct)  
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prianka.sharma@sba.gov



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**From:** [Operation Homecare](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Federal Fossil Fuel Programs in the Offshore Gulf of Mexico  
**Date:** Thursday, April 15, 2021 5:52:19 PM

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The Honorable Debra Haaland  
Secretary of Interior  
U.S. Department of the Interior  
1849 C St. NW  
Washington, D.C. 20240

Amanda Lefton  
Director of BOEM  
Office of Public Affairs  
1849 C St., NW  
Washington, D.C. 20240

**Re: Recommendations for Scope and Criteria for Review of the Federal Fossil Fuel Programs in the Offshore Gulf of Mexico**

Dear Sec. Haaland and Dir. Lefton:

We have expressed our continued concern with the utilization of outdated information and processes which suppress community residence Right to Know and Right to Choose. The approval of new fossil fuel infrastructure or development cannot be justified for Offshore Gulf of Mexico OCS utilizing old data.

We highly recommend that DOI promulgated rules that are available by FLPMA's statutory directive to protect "air and atmospheric", "the long-term needs of future generations", and "prevent unnecessary or undue degradation. Our frontline communities have and continue to experience life threatening quality of life issues including, but not limited to shorter expectancy.

We urge you to prepare a programmatic environmental impact statement (PEIS) pursuant to the National Environmental Policy Act (NEPA). We also recommend strategic targeted focus on data collection, assessment and review specific to cumulative impacts in the Central Gulf of Mexico OCS region.

Thanking you in advance for your favorable consideration of these recommendations., and we look forward to working collaboratively for the Public Good.

Sincerely,  
Jackie Antalan  
Dir. of Outreach & Programs  
Operation HomeCare, Inc.  
P.O. Box 121  
Mobile, AL 36601-0121

Bes

**From:** [Dan Bucks](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Comments on Oil and Gas Program Review  
**Date:** Thursday, April 15, 2021 1:03:49 PM  
**Attachments:** [Comments for 2021 Oil and Gas Program Review.docx](#)

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Secretary of the Interior Debra Haaland  
U.S. Department of the Interior  
18<sup>th</sup> & C Streets, NW  
Washington, D.C. 20240

Transmitted by email to: [energyreview@ios.doi.gov](mailto:energyreview@ios.doi.gov)

***Aligning Interior's Oil and Gas Program with the Needs of the American People in the 21<sup>st</sup> Century: Comments for the Federal Oil and Gas Program Review***

Dear Madam Secretary:

Thank you for this opportunity to submit the attached comments for consideration in the federal oil and gas program review. These comments draw upon forty years of experience in public revenue policy and administration, including extensive work with mineral taxation and royalties and federal resource management issues.

As you and President Biden have noted, the nation and world face the challenge of adapting our economies and energy systems to the existential threat posed by climate change. Oil and gas production will continue during the transition to a new energy future. The Department of the Interior can lead the nation forward in meeting this challenge by making critical, strategic changes to its oil and gas program now. The recommendations submitted here are designed to help Interior make those changes.

As noted in the comments, a critical step will involve Interior forging a transparent, meaningful and effective partnership with the American people to align the oil and gas program with the public interest. As Secretary, you have an opportunity to make an historic change in the relationship between the Department and the people it is intended to serve. Seizing that

opportunity is critical to meeting the challenges we face as a nation.

I wish you and your staff every success in accomplishing fundamental changes in the oil and gas program. Thank you for your leadership of this effort.

Sincerely,

Dan R. Bucks  
Former Montana Director of Revenue  
Former Executive Director, Multistate Tax Commission

Attachment

*Public Revenues Consulting*  
*406 Bentley Park Loop*  
*Missoula, MT 59801*  
[danbucks@publicrevenues.com](mailto:danbucks@publicrevenues.com)  
*406-531-4823*

**From:** [Alaska SOLES](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Fossil Fuel Development  
**Date:** Sunday, April 11, 2021 2:11:43 PM

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Dear Secretary Haaland;

Thank you for undertaking the effort to review the federal government policies on oil and gas extraction on public lands. This is a long overdue review which I hope will be part of a comprehensive, scientific study on the climate effects of fossil fuel extraction. Our planet is in the midst of a climate emergency, and gas and oil development on public lands is the cause of about 25% of U.S. greenhouse gas pollution. I am confident that a rigorous and complete analysis will conclude that we **MUST** phase out fossil fuel extraction, which should start with an immediate ban on further such developments on public lands. All recent scientific studies have shown that the rate of overall temperature warming, polar ice melt, and ocean warming, is advancing much faster than the initial climate change concerns projected. Our earth cannot continue on this trajectory, and any new oil, gas or coal leasing is incompatible with current U.S. climate goals, as pollution from our already producing oil and gas fields could push global warming well past 1.5 degrees C.

Continuing on our current course of behavior, including further fossil fuel extraction on public lands, will cost our country billions. The resulting carbon emissions will further hasten our climate emergency, causing ocean water rising, massive droughts, and increased numbers and severity of natural events such as hurricanes and flooding. Climate caused changes are part of a cyclical series of events: warming air causes arctic tundra to melt, releasing massive amounts of methane, which furthers the temperature change, melting polar ice which raises ocean water levels (flooding, erosion of coastal villages) and kills native fish populations; seals lose their habitat, which decreases the main food source of the polar bears; melting permafrost allows standing tundra water to drain, drying out huge expanses of arctic habitat for caribou, moose, migrating birds, bears etc.

Presently over 38 million acres of public lands and waters (26 million acres of federal public lands and 12 million acres of oceans) are leased to oil and gas companies. Only half of the leased lands have been drilled and less than 20% of the leased ocean area. Presently leased lands are projected to be able to provide crude oil through 2055, coal through 2044, and methane gas through 2044. At present, an astounding 90% of public lands are available to oil and gas leasing. We must make efforts to permanently protect the public lands from further fossil fuel extraction and start our country on the development of sustainable, renewable energy sources.

Up here in Alaska, many of my friends and acquaintances have made their careers in

the oil fields. The most common excuse for further such developments is jobs, jobs, jobs. This short sighted outlook puts the health of our planet, and of our children, grandchildren and great grandchildren (I already have 4) at great risk. My grandsons, of Inupiat descent, were raised to hunt, fish, and be fundamentally respectful of our earth and all of its inhabitants. My own freezers are full of caribou, moose, mountain goat, wild sheep, fish, and wild berries. A planet that no longer can provide a sustainable lifestyle to anyone is just beyond imagination.

If an immediate ban on further fossil fuel leasing on federal public lands is instituted, we can begin to use the financial and brain power resources of our great nation to invent far more efficient and less invasive forms of renewable energy production, such as wind turbines that don't require huge blades, water flow turbines that only minimally affect river flow, solar production that can be either centralized or individually located, depending on the community size and needs. Green power will create millions of new jobs, in its innovative development, production, installation and maintenance. But we can't get there without the first step of halting all new public land fossil fuel extraction, and turning our government efforts in a new direction.

I hope that you will be inspired to work with other federal agencies, with our elected representatives in Congress, and with our tribal and state governments to phase out fossil fuel production in such a manner that other economic opportunities are offered to those areas that are presently most dependent on and impacted by federal fossil fuel development. The social, economic and environmental costs of climate inaction are real, immediate, growing and massive. In Port Heiden village, where I spend part of each year, I have personally watched a lake, by whose wayside a whole village once lived, drain into the ocean after all of the houses either fell into the water or were hastily moved far away. In the last 25 years, the village fuel farm was moved three times to keep it safe from increasing coastal erosion, and these moves were funded by federal government grants and programs. As we develop and extract fossil fuels, we are killing off the fishing that has sustained so many of these communities both through subsistence and commercial uses. Over recent years we have seen the beaches littered with dead sea birds who can no longer find sufficient food sources. This is just a tiny microsample of what will be in the future if we don't take immediate action. We must demonstrate strong leadership to begin to control the current climate emergency, by ending all new oil and gas leasing on public lands and waters.

Thank you for your attention, and for your efforts to protect our greatest legacy, our wild lands and waters, and the wildlife, birds and fish that depend on their health.

Sincerely,

Loren J Karro  
Co-Leader, **Alaska Soles**  
**Great Old Broads for Wilderness**  
(907) 745-3712  
26239 E Buckshot Dr  
Palmer, AK 99645

"To make life a little better for people less fortunate than you. That's what I think a meaningful life is. One lives not just for

oneself, but for one's community." Ruth Bader Ginsburg



**From:** [Alex Taurel](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Petition from LCV members  
**Date:** Thursday, April 15, 2021 4:47:23 PM  
**Attachments:** [DOIComments\\_LCV415.pdf](#)

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Hi-

Thank you to the Department of the Interior for conducting this review of the federal oil and gas program and for offering the public an opportunity to comment. I'm attaching a petition (also pasted below) recommending changes to the oil and gas program and the names of 6,938 members of the League of Conservation Voters that signed it. Thanks for your consideration!

Best,  
Alex

Alex Taurel  
*(He/Him/His)*  
Conservation Program Director  
League of Conservation Voters  
[alex\\_taurel@lcv.org](mailto:alex_taurel@lcv.org)  
(c) 202-669-1199  
Twitter: @LCVoters

**Petition text**

I'm a constituent of the League of Conservation Voters -- and I'm urging you to overhaul our broken oil and gas system so our public lands begin serving people, not polluters.

Right now, our oil and gas system on public lands and waters puts drilling in front of wildlife, recreation, clean energy development, and maintaining clean air and water. It's polluting nearby communities, wasting taxpayer dollars, and making climate change worse. And it's why we need visionary leadership to chart a new path for our public lands and waters--one that makes them assets in the fight against climate change.

That is why I urge the Department of the Interior to develop plans to reach net-zero emissions on public lands and waters by 2030 to help limit global warming to 1.5 degrees Celsius, including--to the maximum extent possible under existing law--ending new leasing and limiting development of existing leases and targeted lease buy-backs. As part of the reforms undertaken to reach this goal, I encourage Interior--at the very least--to eliminate wasteful speculative leasing practices, close

loopholes that allow companies to shift clean-up costs onto taxpayers and private landowners, and force companies to stop exploiting public lands and resources and start fairly compensating taxpayers. As we undergo a necessary transition away from drilling on public lands and waters in order to leave a habitable planet for future generations, we have an obligation to ensure that workers and communities that powered our growth have the resources and tools to thrive in this new era.

Thank you for helping build a new public lands system that protects our climate, our health, and our recreation opportunities and sacred sites.

+++++

**From:** [Nathan Johnson](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Ohio Citizen Petition for Ban on new Federal Public Lands Oil & Gas Leasing  
**Date:** Thursday, April 15, 2021 11:27:59 AM  
**Attachments:** [OEC Moratorium Petition - Letter.pdf](#)  
[OEC Moratorium Petition FINAL.xltx](#)

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Dear Department of Interior Staff,

Attached please find the citizen petition of the Ohio Environmental Council (OEC) and 550 individual co-signers calling for a permanent ban on new oil and gas leasing on federal public lands. We believe a ban on new federal leasing is a necessary step in the effort to tackle the climate crisis. And, a ban will benefit public health and locally-based outdoor recreation economies.

We submit this petition in response to President Biden's January 27, 2021 Executive Order # 14008, "Tackling the Climate Crisis at Home and Abroad," which ordered a moratorium on new federal oil and gas leasing pending agency review and public input.

Thank you for considering our input on this vitally important matter.

Nathan Johnson | Public Lands Director  
Ohio Environmental Council & Ohio Environmental Council Action Fund  
1145 Chesapeake Ave., Suite I, Columbus, OH 43212  
Main: (614) 487-7506  
Direct: (614) 487-5841



**From:** [Diera, Alexx A](#)  
**To:** [Energy Review](#)  
**Subject:** Fw: BFO Last ? Response from WY Session  
**Date:** Wednesday, April 14, 2021 3:01:29 PM

---

Alexx Diera  
Special Assistant  
Bureau of Land Management  
She/Her

---

**From:** Yeager, Todd D <[tyeager@blm.gov](mailto:tyeager@blm.gov)>  
**Sent:** Wednesday, April 14, 2021 2:57 PM  
**To:** Stovall, James K <[jstovall@blm.gov](mailto:jstovall@blm.gov)>; Diera, Alexx A <[adiera@blm.gov](mailto:adiera@blm.gov)>  
**Cc:** Bagley, Lonny R <[lbagley@blm.gov](mailto:lbagley@blm.gov)>  
**Subject:** BFO Last ? Response from WY Session

Jim and Alex – Thank you for taking to time to facilitate and listen to the WY BLM staff on Federal Oil and Gas Leasing. In relation to the last question on the one element I would like to optimize is the issue of the legacy oil and gas fields. Most of the fields in this category produce very little gas or less than 5 barrels of oil/day/well. Some even produce 1 to 2 barrels of oil/day/well. These fields start out productive and then get sold from operator to operator as economic feasibility and production decreases. In the end what usually occurs is a low-input operation that does not have the operational capital to keep up with the maintenance or handle a large catastrophe like a large spill. Some of these are a family enterprise usually formed as an LLC or company to shield liability. I have been in the conversations with the family operations and accused of putting them out of business because they need to address non-compliance issues; however BLM has a public trust responsibility, responsibility to remedy the situation on private split estate lands, and the operator has an economic responsibility. In the end, this results in a huge time commitment in getting compliance on environmental issues (spills, repairs, etc.) and these fields are many times an eyesore on BLM and private lands.

A few options to explore is the how BLM handles change of operator requests and a question of financial stability beyond bonding. For Wyoming the change

of operator request is handled at the state office and they are reviewed and approved. There is rarely, if ever, a denial. I would propose that the process is changed for split estate lands so that the change of operator request illustrates the new operator has a surface use agreement with the private landowner. In addition, I would like to see some type of litmus test, maybe it is bonding, that illustrates that the operator can financially handle the maintenance associated with aging infrastructure.

Once again, thank you for your valuable time and take care. Todd

Todd Yeager  
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**From:** [Len Montgomery](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] U.S. PIRG comments on Federal Oil and Gas Program  
**Date:** Thursday, April 15, 2021 2:43:18 PM

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To: Department of the Interior  
Fr: U.S. PIRG  
Re: U.S. PIRG comments on Federal Oil and Gas Program  
4/15/21

On behalf of 7,300 members of the public (see attached for full list of commenters), I am submitting the following comment for your consideration as you review of the federal oil and gas program as called for in Executive Order 14008:

Thank you for instating a moratorium on fossil fuel leasing on public lands. I urge the Biden administration to take further action on climate change by turning this temporary moratorium into a permanent ban.

If the world's existing fossil fuel infrastructure keeps operating throughout its expected lifetime, global temperatures will rise above 1.5 degrees Celsius -- which scientific studies show we need to prevent.

From worsening air quality to natural disasters fueled by global warming, the effects of fossil fuel pollution are all too clear. A healthier, safer future is possible -- but we have to take swift action on climate change now.

To take a meaningful step toward preserving a livable planet, clean air and clean water for generations to come, I urge the Biden administration to ban all new oil and gas drilling on public lands.

 [U.S. PIRG Drilling Public Comments 4.15.2021.pdf](#)

**From:** [Zarah Patriana](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Earthjustice supporter comments for the federal fossil fuel program review  
**Date:** Thursday, April 15, 2021 4:22:13 PM  
**Attachments:** [Earthjustice\\_OilGascomments.csv](#)

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Hi there,

My name is Zarah Patriana and I work with Earthjustice. I am submitting the names of 17,726 individuals who have submitted public comments urging the U.S. Department of the Interior embrace a number of solutions and reforms to the federal oil & gas leasing program. Below you will see the letter that our Earthjustice supporters signed and attached to this email is the excel file containing their names. [In addition, you can access the letters through this link which should bring you to a .pdf file.](#)

**RE: Protect our public lands and waters from fossil fuels**

Dear Department of Interior:

Thank you for pausing oil and gas leasing on public lands. We commend you for undertaking the first comprehensive review of the leasing program in decades.

The oil and gas leasing system on our public lands and oceans is broken and we're all paying the price. Tribes, local communities, businesses, and bipartisan elected officials near public lands and on our coasts know all too well that this system is rigged to give all the influence to the oil and gas industry.

We encourage the administration to embrace a number of solutions and reforms, including:

- Develop a comprehensive strategy for addressing and limiting the carbon pollution stemming from federal fossil fuel development, including the adoption of a carbon budget consistent with meeting the United States' obligations under the Paris Accord.
- Withdraw the most sensitive federal lands and waters from availability for new oil and gas leasing, and require net-zero carbon emissions from any new leasing on other federal lands and waters.
- Immediately reinstate President Obama's coal leasing moratorium. Burning coal mined from public lands contributes an estimated 10% of U.S. carbon emissions.
- Strengthen health, safety, and environmental protections, such as regulations that

limit the amount of methane — a climate super-pollutant — that oil-and-gas operations can release into the air.

- Ensure a fair return to taxpayers by increasing the amount that private corporations pay to lease federal lands and waters for fossil fuel development, including by setting royalty rates that account for the true social and environmental costs of the carbon produced on these leases.

This holistic review of the system is long overdue, and the last four years have only made the problem worse. The broken system rips off the public with giveaways to the oil and gas industry while communities see little in return except for pollution that threatens our health, our clean water, our coasts, and our climate.

Thank you for taking important action and charting a new path forward so that our public lands, coasts, and waters benefit people and local communities, not corporate polluters.

Sincerely,  
[undersigned]

---

Zarah Patriana (she/her)  
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*Because the earth needs a good lawyer*

**From:** [James, Caroline](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Federal Oil and Gas Program Petition  
**Date:** Thursday, April 15, 2021 9:43:39 AM  
**Attachments:** [image001.png](#)  
[Oil and gas leasing petition.pdf](#)

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Hello –

I have attached a petition with 24,025 signatures regarding the federal oil and gas program.

Do not hesitate to reach out to me with any questions about the attached document.

Best,  
Caroline

---

**Caroline James**  
*Digital Production & Analytics Associate*  
 Friends of the Earth  
[cjames@foe.org](mailto:cjames@foe.org)

**From:** [Kim Pope](#)  
**To:** [Energy Review](#)  
**Subject:** [EXTERNAL] Sierra Club Comments on the Review and Reform of the Federal Fossil Fuel Program  
**Date:** Thursday, April 15, 2021 4:15:50 PM  
**Attachments:** [Drilling Moratorium Comments.csv](#)

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Dear Secretary Haaland:

Thank you for taking an important first step in pausing new oil and gas leasing and drilling on public lands. This email provides comment on the Department of the Interior's review and reform of the federal fossil fuel programs, as set forth in Executive Order 14008 of January 27th, 2021 and an attached .csv file of 12,357 signatures collected on behalf of the Sierra Club. You can find added personal comments in column H of the spreadsheet.

The science is clear -- to tackle the climate crisis, we need to turn this pause into a permanent ban as we transition away from fossil fuels. Since fossil fuel extraction on public lands is linked to roughly a quarter of US greenhouse gas emissions, ending coal mining and oil and gas drilling on these lands is an important first step towards accomplishing the Biden administration's climate goals.

For decades, Big Oil has been able to lease public lands for as little as \$2 an acre, with no accounting for the true cost of oil extraction, both in terms of health risks for nearby communities, and long-term damage to the climate. Coal from public lands is often sold around \$1 per ton -- 2,000 pounds of coal for roughly 1/3 the price of a gallon of milk. It's time for the fossil fuel boom-and-bust cycle to end once and for all.

Now, oil companies are falling back on one of their classic scare tactics -- misleading the public to believe that this moratorium will crash the economy and create mass unemployment. In reality, we have an opportunity to "build back better" with a jobs program that puts people to work cleaning up the thousands of abandoned mines and oil wells on public lands. Research shows that this sort of program could generate over 100,000 new jobs across the country.

This leasing moratorium is important progress -- now we need to see things through and make it permanent. The Biden Administration must end all fossil fuel extraction

on public lands and waters.

Please feel free to reach out if you have any questions,

Kimberley Pope

Campaign Representative, Southwest Region

[Our Wild America Sierra Club](#)

602.516.9067

Pronouns: she, her, hers

*Working from the occupied land of the Tohono O'odham, O'odham, and Hohokam people.*

## Form Letter Contents

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### Form Letter 1: 1,415 received

Hello: Why turn away from one of America’s strengths, especially as we try to recover from the pandemic? Economic recovery will be made easier because the United States has relatively low household energy costs, in large part because of the domestic energy revolution that has occurred over the last decade. This energy boom has happened in large part due to development on federal lands and waters. But continuation of President Biden’s pause on new federal leases puts this all at risk. Restricting development on federal lands and waters is nothing more than an import-more-oil policy. It will send U.S. dollars to foreign countries, whether they are our friends or not. We can meet our energy needs right here in America -- which will employ the US work force at a time when every good job counts. That’s something President Biden talks a lot about, but we need him to take action to protect and grow jobs. It’s more than just energy jobs at stake. An Obama-era BOEM report analyzing the effects of potential offshore leasing restrictions found that U.S. GHG emissions will be little affected positively, and could very well increase slightly due to increased foreign imports transported from overseas. Fewer jobs and an increase in emissions? If the leasing pause turns into a long-term ban on development America could be facing even more challenging economic times. Please end President Biden’s pause on all new natural gas and oil development on federal lands and waters. It’s the wrong policy at the wrong time. Thank you.

### Form Letter 2: 6,665 received

Dear Secretary of the Interior Secretary Haaland, I am writing this note to express my concern over the indefinite pause in new oil and natural gas leases on public lands and in waters and the Department of the Interior’s Secretary’s statement that the federal oil and gas leasing program is “fundamentally broken.” This pause in leasing and the negative rhetoric around the leasing program creates regulatory and economic uncertainty in my state and across the country. It also puts good-paying energy jobs and critical funding for our region at risk. Why is it important to people like me? Nearly 25% of U.S. oil and 12% of U.S. natural gas is produced on federally owned land and waters. Thus far, your constituents

have sadly been left out of the process on a decision that could have major impacts on our local economies and jobs – at a time when we can least afford it. Reducing production on federal lands and waters could eliminate jobs, negatively impact economic growth, increase household energy costs, and even increase emissions, in part by increasing the need for coal-powered electricity. I hope you'll take my thoughts into consideration and support oil and gas leasing on federal lands and waters.

#### [Form Letter 3: 148 received](#)

To whom it may concern: As a veteran, I am concerned about the impact President Biden's pause on new natural gas and oil leases on federal lands and waters will have on both our national security and our economic recovery, especially if the pause is made permanent. American-made energy provides affordable, reliable power to American families and businesses. This reliability has been even more important during the pandemic. I know that energy demand will continue to rise as the economy recovers. We have two choices on how to meet this demand: produce that energy here in the United States or rely on foreign countries that could be hostile to American interests. I know what my choice is. Federal production provides enormous benefits beyond household energy costs and national security. Without new development on federal lands and waters, our country could stand to lose more than 1 million jobs by 2030 and \$9 billion in government revenue. The Gulf Coast region alone could lose more than \$220 million in revenue. This pause on new federal leasing is the last thing this country needs during these challenging economic times. Thank you.

#### [Form Letter 4: 584 received](#)

Hello- I am proud to be part of America's labor force not only because it provides a high quality of life, but also because my work produces the energy needed by millions of American homes and businesses. But I worry that continuing President Biden's pause on new natural gas and oil leasing on federal lands and waters could put all of this at risk. Labor, and in particular union labor, has helped the U.S. natural gas and oil industry become a world energy leader, and the country be a net energy exporter for the first time in decades. A big reason for this is development on federal lands and waters, which account for 22% of oil production and 12% of natural gas production. Suspending federal development would also be bad for the environment. Without leasing and development on federal lands and waters, coal use could increase by 15% and CO2 emissions in the power sector could increase by 5.5% by 2030 because we would slow the transition away from coal. In an Obama Administration Bureau of Ocean Energy Management report analyzing the effects of potential offshore leasing restrictions, experts found that U.S. GHG emissions could increase slightly due to the transportation costs of importing more foreign oil. I encourage the Department of the Interior to take these facts into consideration as you conduct your review under the executive order. The administration said publicly that this pause would only be temporary. It would be a bad policy in normal times, but it could prove to be a devastating action as the country recovers from the pandemic. We cannot risk the more than 1 million jobs and \$9 billion in federal revenue that could be lost by 2030 if there is a permanent leasing and development ban. Thank you.

#### [Form Letter 5: 190 received](#)

Hello- I am proud to be part of America's labor force not only because it provides a high quality of life, but also because my work produces the energy needed by millions of American homes and businesses.

But I worry that continuing President Biden's pause on new natural gas and oil leasing on federal lands and waters could put all of this at risk. Labor, and in particular union labor, has helped the U.S. natural gas and oil industry become a world energy leader, and the country be a net energy exporter for the first time in decades. A big reason for this is development on federal lands and waters, which account for 22% of oil production and 12% of natural gas production. Suspending federal development would also be bad for the environment. Without leasing and development on federal lands and waters, coal use could increase by 15% and CO2 emissions in the power sector could increase by 5.5% by 2030 because we would slow the transition away from coal. In an Obama Administration Bureau of Ocean Energy Management report analyzing the effects of potential offshore leasing restrictions, experts found that U.S. GHG emissions could increase slightly due to the transportation costs of importing more foreign oil. I encourage the Department of the Interior to take these facts into consideration as you conduct your review under the executive order. The administration said publicly that this pause would only be temporary. It would be a bad policy in normal times, but it could prove to be a devastating action as the country recovers from the pandemic. We cannot risk the more than 1 million jobs and \$9 billion in federal revenue that could be lost by 2030 if there is a permanent leasing and development ban. Thank you.

#### [Form Letter 6: 16,662 received](#)

The Honorable, Dear Secretary Haaland, Thank you for your climate leadership and for undertaking a long-overdue climate review of the federal fossil fuel programs. I am writing to ask you to undertake a full and rigorous environmental impact study. If done correctly, it will show what the scientists have said, that there is no more room for new fossil fuel development if we are to have a chance at a liveable planet. And that means our climate future can't afford more fossil fuel leasing and development on our public lands and waters. Pollution from the world's already-producing oil and gas fields, if fully developed--even without factoring in coal--would push warming well past 1.5 Celsius. That means any new oil, gas, or coal leasing on public lands and waters is incompatible with our country's climate goals. Phasing out the federal fossil fuel programs will benefit public health and low income communities and communities of color who already experience disproportionate pollution and climate impacts. It will help the twin climate and extinction crises by cutting climate pollution and stopping destruction of public land and ocean habitat for species like polar bear, Greater sage-grouse, ringed seals, and Colorado pikeminnow. I urge you to work with other federal agencies, Congress, Tribes, and state governments to ensure an orderly decline to federal fossil fuel production--one that ensures a just and equitable transition for communities both economically dependent on and impacted by federal fossil fuel development. I urge your agencies, in the context of the forthcoming environmental review, to fully consider the social, economic, and environmental costs of climate inaction, including as may result globally from the failure of the U.S. to demonstrate strong leadership, as with the federal fossil fuel programs. Thank you for your consideration, and thank you again for your climate leadership.

#### [Form Letter 7: 72 received](#)

Dear Interior Oil and Gas Leasing Program,  
As an avid outdoor recreationist, I want to share my feedback on the oil and gas leasing program.

Over the past four years, the “energy dominance” policy at DOI has resulted in losing time against fighting climate change and has displaced other key values on public lands, including outdoor recreation. Instead of making steps forward, there were leaps backward. And the current state of our public lands and environment can't afford anything but leaps forward. I hope Interior acts to improve the following aspects of the oil and gas leasing program:

- Climate change is an urgent crisis. Our country must transition away from fossil fuel development to make public lands and waters carbon neutral.
- If there is any role for continued fossil fuel development on public lands and waters, DOI must make public engagement a priority and ensure that comment periods are adequate and Interior engages with the American public.
- DOI must engage meaningfully with Tribes and allow them to be authentic decision makers on oil and gas leasing interests.
- DOI must end offshore drilling in the Atlantic, Pacific, Gulf of Mexico, and Arctic Ocean to protect valuable marine and coastal ecosystems, as well the communities and businesses that depend on these resources. Specifically, this action will protect an ocean recreation and tourism industry valued annually at more than \$129 billion in the United States.
- Addressing climate change requires an aggressive society-wide pivot toward renewable energy sources, and public lands and waters will be a necessary component of that transition. That does not mean, however, that every renewable energy project is appropriate in any location, and DOI must ensure that judicious guidance and processes exist to move expeditiously on renewable energy development at scale in a manner cognizant of other resource values. There is no time like the present to act, and I hope you'll do what is right.

#### Form Letter 8: 6,476 received

Dear Haaland, I am writing because I value our public lands and waters. I disapprove of how our public lands have been given over to oil companies for gas and oil drilling and fracking. Fracking for oil and gas is unsafe, extreme and dangerous. It causes massive amounts of methane leakage, water contamination, air pollution and even earthquakes. It disrupts wildlife, harms people and communities, and it's devastating public lands. It must end. In order to combat the climate crisis, we must stop the extraction and burning of fossil fuels. This requires taking a stand against the oil and gas industry directly. We must keep fossil fuels in the ground — we can't allow any further drilling and fracking on public lands. The inherent danger of fracking means that no set of regulations can ever make it safe for public health or the environment. Ending fracking on public lands and waters is a no-brainer. I urge you to keep our public lands and waters protected and not in the hands of oil and gas companies.

#### Form Letter 9: 2,054 received

Dear US Department of Interior Oil and Gas Comments, As a recreational user of our nation's public lands and waters, I ask that you terminate the federal oil and gas leasing program. Fossil fuel development is a damaging practice that puts our environment and human communities at risk. It also exacerbates climate change impacts as our nation and world struggle to reduce greenhouse gas emissions. Oil and gas development is broadly opposed by communities, businesses, tribes and the public. This is especially true when it comes to offshore drilling. To date, more than 380 municipalities, 2,500 elected officials, 55,000 businesses and 500,000 fishing families have formally opposed new offshore oil and gas development. Please protect our nation's environment, communities and the future of our planet by ending the federal oil and gas leasing program.

### Form Letter 10: 102 received

Dear Haaland, I am writing to you because I am concerned about SoCalGas' plan to double the size of a historically faulty compressor station across the street from an elementary school in West Ventura, CA. Identified as a methane super-emitter by NASA, the facility has had a bad track record of leaks and violations. It has also been home to numerous industrial uses over the decades. As a result, the property is contaminated by a number of harmful chemicals, including arsenic, lead, petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs). A building slated to be torn down may also contain asbestos. The California Department of Toxic Substance Control (DTSC) has plans to remediate the site by removing the soil's top layer. I am concerned that DTSC's workplan does not contain the safeguards needed to protect the community from lead-laden dust and airborne contaminants. This is especially alarming given that the site is directly across the street from EP Foster Elementary School and near hundreds of homes with children. Also, the Westside of Ventura is listed by the Cal EPA as a disadvantaged community already facing some of the highest pollution in all California. This should not be the site for any more pollution. Many organizations and members of the Westside community wrote to DTSC expressing concern over the inadequate dust controls in the clean-up plan. The response from DTSC was not satisfactory. They have denied the community's request for a bilingual public hearing, stating a lack of public interest. I urge you to join the community in demanding the Department of Toxic Substance Control hold an inclusive and bilingual hearing to address further questions. Also, that SoCalGas and government agencies conduct a full Environmental Impact Review of the entire expansion project, which is usually required for toxic projects of this size.