

## **Comments on the Bureau of Land Management Waste Prevention, Production Subject to Royalties and Resource Conservation Rule**

- 3162.3-1 (j) Waste Minimization Plans.  
Requirement is duplicative, forces disclosure of anticipated production data that decreases our competitive advantage, and creates uncertainty in the APD approval process.  
  
Management of the development of oil and gas fields can be very specific to each field and should be left to the respective state(s) to determine requirements and best practices.
- 3179.6 Flaring and Venting Prohibitions, 3179.7 Alternative Limits on Venting and Flaring, & 3179.101-3179.204 Venting and Flaring Requirements for Drilling, Production, and well maintenance operations.  
The BLM does not have jurisdiction to regulate air quality, which venting and flaring may impact, and therefore cannot authorize when venting or flaring can occur.
- 3179.11 Other Waste Prevention Measures  
This is one of the most dangerous provisions in the rule to operators. In most cases, the BLM does not have the information, expertise or other technical data based information to make this determination. This is a very broad power that allows a BLM employee to limit/eliminate production from a well, a pad or even multiple wells on a lower pressure gathering system if they “feel” like it may cause other wells to go to flare due to capacity issues or line pressure.
- 3179.301-3179.305 Leak Detection and Repair (LDAR) Programs  
As previously state BLM does not have standing to regulate air quality. At most this section should simply refer to EPA’s Quad Oa requirements.