

U.S. Department of the Interior
1849 C St., NW
Washington, D.C. 20240

November 16, 2022

RE: Initiating a Rulemaking to Reform the Federal Oil and Gas Leasing System

To the Honorable Secretary of the Interior Deb Haaland:

The Department of the Interior's Bureau of Land Management recently announced plans to offer more than 260,000 acres of federal public lands across [New Mexico](#) and [Wyoming](#) for oil and gas lease sales scheduled for the second quarter of 2023 and plans to issue notices to evaluate additional potential sale parcels in other states in the coming weeks. We, the undersigned organizations, are deeply concerned that the Department of the Interior (DOI) is moving forward with more oil and gas leasing before releasing its proposed rule to revise the BLM's fossil fuel regulations and reform the antiquated onshore oil and gas program.

DOI has a mandate to protect America's public lands and cultural heritage and yet, for decades, the federal leasing program has short-changed our public lands, wildlife, and taxpayers while threatening the health of our communities and our environment. New, durable rules are long overdue and desperately needed to ensure the program better serves everyone.

Congress recently passed the historic Inflation Reduction Act (IRA) which includes several critical updates to the onshore oil and gas program. Now, we're calling on your Department to move a rulemaking forward that incorporates those critical updates and makes other sorely-needed reforms to the federal oil and gas program before new lease sales take place. Such a rulemaking should, at a minimum:

- Implement the important, necessary policy changes included in the Inflation Reduction Act, which established the long-overdue increases to the fiscal rates and terms for leasing and development on public lands and eliminated the wasteful practice of leasing lands noncompetitively for just \$1.50/acre;
- Address all of the remaining core problems that the [Department highlighted in its report from November of last year](#) by 1) requiring oil and gas companies to fully pay for potential clean-up costs so that taxpayers aren't stuck with the bill for well clean-up; 2) avoiding the massive leasing of areas with low potential for oil and gas development; and 3) creating and ensuring a more transparent process that provides meaningful opportunity for public engagement and Tribal consultation; and
- Utilize all available discretion to pursue additional changes that will move the Bureau of Land Management's stewardship of our public lands closer in line with the public's interest in protecting and preserving public lands and wildlife.

Please do not miss this critical opportunity to build on the progress Congress made this year and initiate a rulemaking to enact common sense reforms to the decades-old federal oil and gas program before any new leasing occurs.

Thank you for your time and consideration.

Sincerely,

Archaeology Southwest
Coalition to Protect America's National
Parks
Colorado Fiscal Institute
Colorado Wildlife Federation
Earthjustice
Evergreen Action
Hispanic Access Foundation
League of Conservation Voters
Montana Wildlife Federation
National Parks Conservation Association
National Wildlife Federation
Natural Resources Defense Council
Nevada Conservation League

Nevada Wildlife Federation
New Mexico Voices for Children
New Mexico Wild
New Mexico Wildlife Federation
Nuestra Tierra Conservation Project
Public Citizen
Public Land Solutions
Rocky Mountain Farmers Union
Rocky Mountain Wild
The Wilderness Society
Western Colorado Alliance
Wild Montana
Wilderness Workshop
Wyoming Outdoor Council

CC: Tommy Beaudreau, Deputy Secretary, Department of the Interior