November 18, 2025

The Honorable Bill Groffy
Acting Director, Bureau of Land Management
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Acting Director Groffy,

There are currently at least 5,033 oil and gas leases totaling nearly 4 million acres issued nationwide that may be in violation of the Federal Land Policy & Management Act (FLPMA).[1] This serious issue has arisen because the Administration and Congress have taken the position that Resource Management Plans (RMPs) are rules pursuant to the Congressional Review Act (CRA), and Congress has disapproved three RMPs and is poised to disapprove others. These actions have raised serious questions about the validity of every RMP adopted by the Bureau of Land Management (BLM) since the CRA's passage in 1996. In the 2025 Reconciliation Act, Congress re-affirmed that oil and gas leasing must occur under an effective RMP.[2] As a result, thousands of previously issued leases are in jeopardy because Congress has raised serious doubts about the validity of the RMPs pursuant to which those leases were issued.

New leases are likewise vulnerable. In fact, 69.8% of all BLM lands available for leasing are currently managed pursuant to RMPs finalized after passage of the CRA and which have never been submitted to Congress. The BLM is currently evaluating 850 parcels totaling 787,927 acres across 14 lease sales on lands that may lack a valid RMP. **The BLM may not proceed with mineral leasing in the absence of a valid RMP.**[3] **Doing so risks violating**

[1] All data cited in this letter is included and methodologies explained in the attached Appendix A. Lease data is from the BLM Mineral and Land Record System (MLRS) and includes those leases issued by a BLM Field Office after the date that the *current* RMP was finalized, for all RMPs that were finalized after the enactment of the Congressional Review Act (CRA). Given the scale of the issue, this initial analysis did not include leases issued under prior RMPs which also post-dated the CRA. Therefore, the number of leases that may be in violation of FLPMA is likely to be substantially higher. For example, for the Rock Springs Field Office our analysis found 11 leases totaling 17,908 acres that are potentially invalid. However, when considering all leases issued pursuant to the previous 1997 Green River RMP, those numbers grow to 285 leases totaling 436,809 acres.

[2] Pub. L. No. 119-21, § 50101(c)(2)(A), 129 Stat. 72, 138 (2025) ("[The BLM] shall offer . . . parcels . . . *under the applicable resource management plan in effect*...." (emphasis added)).

[3] The BLM likewise cannot proceed with mineral leasing on National Forest System lands in the absence of a valid land and resource management plan under the National Forest Management Act. *See* 16 U.S.C. § 1604(i); 30 U.S.C. § 226(g)-(h).

FLPMA, the 2025 Reconciliation Act, and the Mineral Leasing Act (MLA) and may therefore be contrary to law. BLM should pause all further leasing until it ensures compliance with FLPMA.

Under FLPMA, the BLM may issue decisions such as leases, permits, rights of way, and other authorizations *only* "in accordance with" a valid land use plan.[4] FLPMA's implementing regulations likewise provide that all "resource management authorizations and actions . . . shall conform to the approved [RMP]."[5] BLM cannot proceed with approving new leases or authorizations or take other action predicated on a plan that is not valid and therefore not in effect. Doing so would violate FLPMA along with the recently enacted 2025 Reconciliation Act[6] (and the MLA, which it amended) and be contrary to law, in violation of the Administrative Procedure Act. As a result of Congress's recent and ongoing actions, there is serious uncertainty that *any* of BLM's post-1996 plans are in effect, or that any decisions taken pursuant to those plans are legally valid.

The CRA requires federal agencies to submit rules to Congress for review ***before*** they can take effect.[7] Historically, land management agencies like the BLM have not submitted their land or resource management plans to Congress, taking the position that such plans are not "rules" for CRA purposes. However, after the Government Accountability Office (GAO) determined, at the request of members of Congress, that three RMPs *were* "rules" for purposes of the CRA,[8] Congress voted in October 2025 to disapprove those three RMPs under the terms of the CRA, subjecting RMPs to the CRA's procedural requirements for the first time and creating uncertainty about a litany of other RMPs. As Deputy Secretary MacGregor herself noted in a letter to Congress following the House passage of these resolutions, "the House of Representatives made a conclusive determination under the

[4] 43 U.S.C. § 1732(a).
[5] 43 C.F.R. § 1610.5-3(a).
[6] Pub. L. No. 119-21, § 50101(c)(2)(A), 139 Stat. 72, 138 (2025); *id.* 138–39 (2025) (directing that certain lands meeting certain conditions be made available for leasing "if the Secretary determines that the parcel of land is open to oil or gas leasing *under the approved resource management plan applicable to the planning area in which the parcel of land is located that is in effect*…" (emphasis added)); *id.* at 139 (explaining that issued leases "shall be subject to the terms and conditions of the *approved resource management plan*…." (emphasis added)).
[7] 5 U.S.C. § 801(a)(1)(A) ("Before a rule can take effect, the Federal agency promulgating such rule shall submit to each House of the Congress and to the Comptroller General a report containing…").
[8] U.S. Gov't Accountability Off., *Applicability of the Congressional Review Act to Central Yukon Record of Decision and Approved Resource Management Plan*, B-337200, at 5–6 (June 25, 2025); *accord* U.S. Gov't Accountability Off., *Applicability of the Congressional Review Act to North Dakota Field Office Record of Decision and Approved Resource Management Plan*, B-337175 (June 25, 2025); U.S. Gov't Accountability Off., *Applicability of the Congressional Review Act to Miles City Field Office Record of Decision and Approved Resource Management Plan Amendment*, B-337163 (June 25, 2025).

Congressional Review Act (CRA) that these RMP decisions… are considered "rules" under the CRA".[9]

This legislative action and its associated significant adverse and destabilizing consequences for federal land management raise serious questions as to whether RMPs approved after passage of the CRA in 1996 are in effect if they have not been submitted to Congress in accordance with the CRA's requirements. The Department's own position as articulated by Deputy Secretary MacGregor implies that the Department believes RMPs are rules subject to procedural requirements of the CRA, including submission to Congress and the GAO Comptroller General, before they can go into effect. Several entities have raised these concerns in recent comment periods on leasing and permitting decisions.

Finally, in addition to pausing all future leasing until it ensures compliance with the law, BLM must, at a minimum, also consider how to address the potential legal deficiencies of the at least 5,033 leases totaling 3,988,850 acres, which were previously issued pursuant to RMPs that were never submitted to Congress. BLM must also consider, and oil and gas lessees must be alerted to, these possible legal deficiencies when evaluating new Applications for Permits to Drill (APDs). **BLM should not approve APDs for leases that may have been issued contrary to law. Further, BLM should consider administratively cancelling leases that may have been issued in violation of FLPMA and the APA.**

Congress' passage of these CRA resolutions has resulted in significant adverse and destabilizing consequences for federal land management, including serious questions about whether land management plans approved after the passage of the CRA are in effect and whether the thousands of oil and gas leases issued pursuant to those plans are legally valid. As a result, **BLM should pause all further leasing and permitting until it takes affirmative steps to ensure compliance with the law and remedy this grave legal uncertainty.**

Sincerely,

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[9] Deputy Secretary Katharine MacGregor, *Letter to Senate Majority Leader John Thune* (October 6, 2025).

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Appendix A: Leasing Data and Methodology

To identify leases issued by the Bureau of Land Management (BLM) pursuant to a Resource Management Plan (RMP) approved following the passage of the Congressional Review Act (CRA), we first compiled a list of all of the BLM field offices in the western lower-48 contiguous states (see below). For each field office (FO), we identified the most recently approved RMP or RMP amendment following passage of the CRA.

We then took the following steps:

1. Utilizing the BLM's Mineral and Land Record System (MLRS), acquired and exported leases for each applicable state.
2. Removed all leases that did not have a case disposition of authorized.
3. Removed duplicate leases based on serial number.
4. Removed leases with no FO.
5. Removed leases with no lease issued date.
6. Assigned leases with two or more FOs to the FO with the oldest RMP.
7. Remove FOs with an RMP dated prior to 30-March-1996. However, for the rare case where the RMP predated the CRA but there was an RMP Amendment (RMPA) following the passage of the CRA, we utilized the date of the RMPA.
8. For all other FOs, leases were retained if they had a lease issued date more recent than the RMP (here we used the date of the post-CRA RMP rather than RMPA).
9. Aggregated these remaining leases by FO and by state to produce Figure 1 below.

We took a conservative approach in instances where the exact date of RMP approval is unknown or uncertain by using the latest date possible (e.g., if an RMP was issued in 2019 we removed all leases issued on or before 12/30/19, or if an RMP was issued in Sept. 2019 we removed all leases issued on or before 09/29/19).

Notably, for FOs where there were multiple prior RMPs that post-dated the CRA, we utilized only the most-recent RMP date. Given the sheer magnitude of the uncertainty and associated consequences identified above, we were unable – for purposes of this initial analysis – to include leases issued under post-1996 RMPs that were subsequently revised (i.e., we only analyzed leases under the most recently approved RMP following passage of the CRA). Including those earlier RMPs would likely yield a substantially greater number of leases – potentially by orders of magnitude. For example, our analysis found that in the Rock Springs (WY) Field Office there are 11 leases totaling approximately 17,908 acres issued pursuant to the Rock Springs RMP approved on 12/20/2024. However, if including leases issued pursuant to the 2006 Jack Morrow Hills Coordinated Activity Plan and 1997

Green River RMP, those figures grow to 285 leases totaling 436,809 acres – just across that single field office.

To determine the proportion of lands available for leasing under current approved RMPs that post-date the CRA, we used the mineral acres open to leasing data from The Wilderness Society's *Open for Drilling* report[10]. Of the 208,232,669 total acres open to leasing in the western continental US (i.e., excluding Alaska), 145,350,563 acres are within RMPs that post-date the CRA (i.e., since 30-March-1996).

Data aggregated by state is below as Figure 1. Data by FOs with relevant RMP dates and leases is compiled below as Figure 2.

Upcoming lease sale data is based on announced quarterly lease sales on BLM e-planning. Lease parcels and acreage are compiled from the relevant FO scoping or Environmental Assessment documents provided on e-planning and linked for each field office in Figure 3. For sales with multiple identified alternatives, figures are based on the preferred alternative and proposed action identified. Field offices included in the sale with RMPs that predate the CRA were removed. Parcels and acreage by sale are summarized in Figure 3.

Figure 1

	Post-CRA Leases	Post-CRA Leased Acreage
Arizona	0	0
California	16	17,422
Colorado	319	296,911
Idaho	0	0
Montana	195	111,012
Nevada	134	264,960
New Mexico	1,426	648,204
North Dakota	27	7,345
Oklahoma, Kansas & Texas	36	16,595
Oregon	45	63,972
South Dakota	22	7,315
Utah	345	438,933
Washington	0	0
Wyoming*	2,468	2,116,180
Total	**5,033**	**3,988,850**
* Includes minerals and leases within Nebraska		

[10] *The Wilderness Society,* Open for Drilling (March 2025): https://www.wilderness.org/sites/default/files/media/file/Open for Drilling_TWS Report_0.pdf

Figure 2

Field Office	Effective Date of RMP	Current RMP	Authorized Leases Effective Since RMP	Authorized Acres Effective Since RMP
ARIZONA				
Lower Sonoran	2012-09	Lower Sonoran ROD and RMP	0	0
Bradshaw Harquahala	2010-04-22	ROD - ARMP: Bradshaw-Harquahala	0	0
Arizona Strip	2008-01-29	Arizona Strip RMP	0	0
Lake Havasu	2007-05-01	Lake Havasu RMP **updates made Dec. 2024**	0	0
Safford	1992-09; 1994-07	2 Partial Records of Decision for the Safford District RMP	0	0
Kingman	1995-03-07	Kingman Resource Area RMP	0	0
Phoenix	1989-09-29	Phoneix RMP	0	0
Yuma	2010-01	Yuma Field Office ROD/RMP	0	0
Baaj Nwaavjo I'tah Kukveni NM	N/A	Incomplete, BLM/USFS currently developing joint RMP	0	0
Grand Canyon-Parashant NM	2008-01-29	Grand Canyon-Parashant NM RMP	0	0
Vermillion Cliffs NM	2008-02	Vermillion Cliffs NM RMP	0	0
San Pedro NCA	2019-07-30	San Pedro Riparian Area NCA RMP	0	0
Las Cienegas	2003-07-25	Las Cienegas RMP	0	0
Ironwood Forest NM	2013-02-19	Ironwood Forest NM RMP	0	0
Agua Fria NM	2010-04-22	Agua Fria NM ROD/RMP	0	0
Sonoran Desert NM	2012-09	Sonoran Desert NM RMP	0	0
		AZ Total	**0**	**0**
CALIFORNIA				
Alturas	2008-04-17	Alturas RMP	0	0
Arcata	2024-09-18	Northwest California Integrated RMP	0	0
Bishop	1993-04-01	Bishop RMP	0	0
Eagle Lake	2008-04-17	Eagle Lake RMP	0	0
Arcata	2004-06-29	Headwaters Forest Reserve RMP	0	0
Medford-Ashland (see Oregon)	2025-01-07	Cascade-Siskiyou National Monument RMP	0	0
Surprise	2008-04-01	Surprise RMP	0	0
Central Coast	2007-09-07	Hollister RMP; Central Coast Oil and Gas RMPA	10	13,449

California Desert and Conservation Area	1980-12-17	California Desert Conservation Area Plan	0	0
Carrizo Plain NM	2010-04-10	Carrizo Plain National Monument ARMP	0	0
California Coastal NM	2005-09-09		0	0
King Range NCA	2005-04-14	King Range NCA RMP	0	0
Bakersfield	2014-12-22	Bakersfield ARMP	6	3,974
El Centro	2008-10-31	Eastern San Diego County RMP	0	0
South Coast	2008-10-31	South Coast RMP	0	0
Redding	2024-09-18	Northwest California Integrated RMP	0	0
		CA Total	**16**	**17,422**
COLORADO				
CRV	2015-06; 2024-12	CRV RMP + 2024 SEIS	6	3,968
Grand Junction	2015-08; 12024-10	GJ RMP + 2024 SEIS	31	24,312
Kremmling	2015-06-19	Kremmling RMP	22	15,969
Little Snake	2011-10	Little Snake RMP	3	4,394
Royal Gorge	2024-01-09	Eastern CO RMP	4	1,840
San Luis	1991	San Luis RMP		
Tres Rios	2015-02-27	Tres Rios RMP	2	884
UFO	2020-04-04	Uncompahgre RMP	0	0
White River	1997-07-01; 2015	White River RMP/White River OG RMPA	251	245,544
		CO Total	**319**	**296,911**
IDAHO				
Bruneau	1983-03-30	Bruneau RMP	0	0
Burley	1985-01-24	Cassia RMP	0	0
Challis	1999-07	Challis Resource Area RMP	0	0
Coeur d'Alene	2007-06	Coeur d'Alene ROD/RMP	0	0
Cottonwood	2009-12-18	ROD and Approved Cottonwood RMP	0	0
Craters of the Moon NM	2007-11	Craters of the Moon NM RMP	0	0
Four Rivers	2023-08	Four Rivers FO RMP/ROD	0	0
Jarbridge	1987-03-23	Jarbridge RMP	0	0
Owyhee	1999-12-30	Owyhee RMP	0	0
Pocatello	2012-07-10	Pocatello RMP	0	0
Salmon	1987-04-08	Lemhi RMP	0	0
Twin Falls	1980-06-30	Bennet-Timmerman Hills RMP	0	0
Twin Falls	1975-06-30	Magic MFP	0	0

Twin Falls FO	1985-04-22	Monument RMP	0	0
Twin Falls FO	1981-12-14	Sun Valley RMP	0	0
Snake River Birds of Prey NCA	2008-09-30	Snake River Birds of Prey NCA RMP	0	0
Upper Snake	1981-10-15	Big Desert RMP	0	0
Upper Snake	1983-12-15	Big Lost RMP	0	0
Upper Snake	1981-06-03	Little Lost-Birch Creek RMP	0	0
Upper Snake	1985-11-29	Medicine Lodge RMP	0	0
		ID Total	**0**	**0**
MONTANA				
Billings	2015-09-18	Billings RMP	15	9,326
Butte	2009-04-17	Butte RMP	0	0
Dillon	2006-02-07	Dillon RMP	11	20,133
Glasgow	2015-09-18	HiLine RMP	0	0
Havre	2015-09-18	HiLine RMP	45	21,152
Lewistown	2021-01-04	Lewistown RMP	0	0
Malta	2015-09-18	HiLine RMP	0	0
Miles City	2015-09-18*	Miles City RMP	124	60,402
Missoula	2021-01-04	Missoula RMP	0	0
		MT Total	**195**	**111,012**
NEVADA				
Black Rock	2004-09-03	Black Rock Desert-High Rock Canyon NCA RMP	0	0
Caliente	2008-08-20	Ely District ROD/RMP	0	0
Bristlecone (formerly split between Egan and Schell)	2008-08-20	Ely District ROD/RMP	60	123,232
Las Vegas	1998-10-05	Las Vegas	0	0
Mount Lewis	1986-03-10	Shoshone-Eureka RMP	0	0
Pahrump	2004-07-01	Nevada Test and Training Range Resource Management Plan (	0	0
Red Rock/Sloan	2005-09-21	Red Rod Canyon NCA	0	0
Red Rock/Sloan	2006-05-30	Sloan Canyon NCA	0	0
Sierra Front	2001-05-11	Carson City FO Consolidated RMP	0	0
Stillwater	2001-09	BLM and Navy RMP for certain federal lands in Churchill county, NV	0	0
Tonopah	1997-10-06	Tonopah RMP	74	141,728
Tuscarora	1987-03-11	Elko RMP	0	0
Wells	1985-07-16	Wells RMP	0	0

Sierra Front	2001-01-11	Southern Washoe County Urban Interface Plan Amendment	0	0
Humboldt River	2015-05-22	Winnemucca District RMP	0	0
		NV Total	**134**	**264,960**
NEW MEXICO				
Amarillo	2020-03-11	OK, KS & TX RMP	1	320
Carlsbad	1988; 1997-10-10	Carlsbad RMP/Carslbad O&G RMPA	1,172	493,293
Farmington	2003-08-29	Farmington RMP	111	70,095
Oklahoma	2020-03-11	OK, KS & TX RMP	35	16,275
Rio Puerco	2024-12-23	Rio Puerco RMP	1	80
Roswell	1997-10-10	Roswell RMP	142	84,737
Taos	2012-05-24	Taos RMP	0	0
		NM Total	**1,426**	**648,204**
		OK, KS & TX Total	**36**	**16,595**
NORTH DAKOTA				
ND	2025-01-08	North Dakota RMP	27	7,345
		ND Total	**27**	**7,345**
OREGON + WASHINGTON				
Burns Andrews	2005-08-26	Andrews +Steens RMP	0	0
Medford-Ashland FO	2025-01	Cascade-Siskiyou NM	0	0
NW Oregon Siuslaw	2015-04	Eugene District - West Eugene Wetlands	0	0
Lakeview Klamath	1996-02	Klamath Falls Resource Area Upper Klamath Basin and Wood River Wetland RMP	0	0
Lakeview	2003-11	Lakeview	0	0
Prineville Deschutes	1986-06-01	Two Rivers RMP	0	0
Prineville Deschutes	1989-07-01	Brothers/La Pine RMP	0	0
Prineville Deschutes	2005-09	Upper Deschutes	0	0
Prineville Central Oregon	2015-04-15	John Day Basin	0	0
Spokane Border	1985-08	Spokane RMP	0	0
Spokane Wenatchee	1985-08			
Burns Three Rivers	1992-09	Three Rivers RMP	0	0
Vale Baker	1989-07-01	Baker RMP	0	0
Multi-district	2016-08	Northwestern and Coastal Oregon RMP	0	0

Multi-district	2016-08	Southwestern Oregon RMP	0	0
Vale Malheur	2002-09; 2024-02-16	Southeastern Oregon RMP/RMPA	45	63,972
		OR Total	**45**	**63,972**
SOUTH DAKOTA				
SD	2015-09-18	South Dakota RMP	22	7,315
		SD Total	**22**	**7,315**
UTAH				
Fillmore	1983/1986	Pinyon MFP/Cedar-Beaver-Garfield-Antimony RMP	0	0
Moab	2008-10-31; 2016-12-15	Moab RMP/Moab MLP	42	42,795
Monticello	2008-11-17; 2016-12-15	Monticello RMP/Moab MLP	5	8,331
Price	2008-10-31	Price RMP	93	161,153
Richfield	2008-10-31	Richfield RMP	20	23,543
Salt Lake	1975/1980/others	Park City MFP/Randolph MFP/others	0	0
Vernal	2008-10-31	Vernal RMP	185	203,112
		UT Total	**345**	**438,933**
WYOMING				
Buffalo	2015-09-21	Buffalo RMP	637	441,389
Casper	2007-12-07	Casper RMP	711	442,590
Cody	2015-09-18	Cody RMP	66	98,945
Kemmerer	2010-05-24	Kemmerer RMP	39	59,004
Lander	2014-06-26	Lander RMP	120	137,921
Newcastle	2000-08-25	Newcastle RMP	333	245,695
Pinedale	2008-11-26	Pinedale RMP	63	61,400
Rawlins	2008-12-24	Rawlins RMP	368	458,521
Rock Springs	2024-12-20	Rock Springs RMP	11	17,908
Worland	2015-09-18	Worland RMP	120	152,808
		WY Total	**2,468**	**2,116,180**
		National Total	**5,033**	**3,988,850**

Figure 3

Lease Sale	Parcels Proposed	Acres Proposed	Field Office(s) and RMP Year
2025 LEASE SALES IN PROGRESS			
New Mexico/Oklahoma Q4 - November 6, 2025 Farmington & Rio Puerco Field Offices Pecos District Office Oklahoma Field Office	21	8,843	Farmington (2003), Rio Puerco (2024), Pecos DO -- (Roswell FO - 1997), Oklahoma (2020)
Colorado Q4 - December 9, 2025 Sale Notice (Modified Leasing Alternative)	60	50,980	Kremmling (2015), Grand Junction (2015/2024), Little Snake (2011), White River (1997)
Utah Q4 - December 10, 2025 Draft EA Alternative A - Proposed Action	46	68,263	Vernal (2008)
Wyoming Q4 - December 3, 2025 Initial Draft EA Alt 2 - Proposed Action	99	84,045	Casper (2007), Buffalo (2015), Lander (2014), Newcastle (2000), Rawlins (2008), Rock Springs (2024), Worland (2015)
Total under consideration in 2025	**226**	**212,131**	
2026 LEASE SALES			
Montana/ North Dakota Q1 - January 2026	20	4,276	Havre (2015), Miles City (2015), North Dakota (2025)
New Mexico/Oklahoma Q1 - 2026 Carlsbad Field Office Farmington Field Office Oklahoma Field Office	32	20,479	Carlsbad (1988/1997), Farmington (2003), Oklahoma (2020)
Louisiana, Arkansas, *Michigan, and Mississippi Q1 - March 2026	7	436	Eastern States; Mississippi - 2009; Michigan (1985)*; Louisiana (2002); Arkansas (2002)

Wyoming Q1 - March 2026 Alt 1 - Proposed Action	68	92,396	Buffalo (2015), Casper (2007), Newcastle (2000), Rawlins (2008), Rock Springs (2024)
Nevada Q1 - March 2026	11	19,957	Egan (Ely District) (2008)
Colorado Q1 - March 2026	103	72,848	Grand Junction, Kremmling, Royal Gorge, Uncompahgre, White River
UT Q1 - March 2026	59	71,787	Moab, Monticello, Vernal
Dakotas Q2 - April 2026	23	8,992	North Dakota (2025), South Dakota (2015)
Wyoming Q2 - June 2026	227	250,931	Buffalo (2015), Casper (2007), Lander (2014), Newcastle (2000), Pinedale (2008), Rawlins (2008), Rock Springs (2024)
New Mexico Q2 - May 2026 Farmington Field Office Pecos District Office	74	33,694	Farmington (2003), Carlsbad (1988/1997)
Total under consideration in 2026	**624**	**575,796**	
Total in 2025 and 2026	**850**	**787,927**	

*Parcels removed for RMP pre-dating CRA