

The Honorable Ryan Zinke  
Secretary  
Department of the Interior  
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Washington DC 20240

Mr. Brian Steed  
Deputy Director, Programs and Policy  
Exercising Authority of the Director  
Bureau of Land Management  
1849 C Street N.W.  
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Ms. Catherine Cook,  
Acting Division Chief  
Fluid Minerals Division  
Bureau of Land Management  
U.S. Department of the Interior  
1849 C St. NW  
Washington, DC 20240

Re: 83 Fed. Reg. 7924 (Feb. 22, 2018), Waste Prevention Subject to Royalties and Resource Conservation, Recession or Revision of Certain Requirements, proposed rule

April 12, 2018

Dear Secretary Zinke:

As western stakeholders, we were dismayed by your proposal to gut the U.S. Bureau of Land Management's Methane Waste Prevention Rule. This rewrite will leave families across the West with less funding for our schools and communities, and more wasted domestic energy resources.

The 2016 BLM Methane Waste Prevention Rule was developed with extensive input from western communities and tribes including more than a half dozen public hearings across the west. As such, it offends us as westerners that BLM is now proposing this rewrite without a single public hearing. At a minimum, we request that the BLM immediately schedule a series of public hearings on this proposal in western communities and that the agency extend the public comment period on this proposal by 60 days in order to provide time for this outreach to take place.

Undoing this rule will cost taxpayers and western communities tens of millions of dollars in much needed revenue for education, local infrastructure projects, and more. In fact, the BLM's own analysis shows that repealing major provisions of the rule will cost Americans more than \$1 billion dollars in wasted natural gas and pollution, and will lead to a significant drop in natural gas production on public lands – as much as 299 billion cubic feet of natural gas – enough energy to heat nearly 500,000 homes each year for the next ten years.

This repeal goes against the wishes of the majority of westerners and stakeholders. During the development of the BLM Methane Waste Rule the BLM received more than 330,000 comments, the overwhelming majority of which support strong action now to cut methane waste.

Time and again, in Congress and the courts, westerns have stood in defense of these waste prevention standards. And we have won. In May 2017, a Congressional Review Act resolution to repeal the BLM methane rule failed in the United States Senate with bipartisan opposition.

During earlier comment periods a bicameral group of Members of Congress, over 90 Western faith leaders, 22 Western stakeholders, as well as tribal leaders including the Ojo Encino Chapter and Counselor Chapter of the Navajo Nation in New Mexico, leaders from Fort Berthold POWER in North Dakota, and the Turtle Mountain Band of Chippewa Indians, sent letters urging BLM to protect the widely supported methane waste rule. Groups across the West also held protests and comment drop-offs at BLM field offices in Colorado and New Mexico to demonstrate their strong opposition to delaying the rule.

The rule enjoys wide popularity among a variety of stakeholders including Republican, Democratic, and independent local officials; farmers and ranchers; public health experts and advocates; taxpayer and fiscal responsibility groups; conservative organizations; Latino organizations; recreation businesses; western businesses; methane mitigation companies; among many, many others. In January 2018, a bipartisan survey issued by Colorado College found that 75 percent of westerners support continuing the methane rule.

Secretary Zinke, as a westerner, we ask that you represent the interests of your fellow westerners by scheduling public hearings and extending this comment period immediately. Federal Courts have already three times rejected attempts to delay the implementation of the rule. Each day that goes by is more lost revenue for western communities, more air pollution, and more wasted energy.

Respectfully,

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Executive Director  
Breathe Utah

Adrian Miller  
Executive Director  
Colorado Council of Churches

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