



The Honorable Ryan Zinke
Secretary
Department of the Interior
1849 C Street, N.W.
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.
Washington DC 20240

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

To the Honorable Interior Secretary Ryan Zinke:

As local, elected leaders from across the Interior West, we are deeply concerned by the U.S. Bureau of Land Management's recent proposal to repeal major provisions of the 2016 Methane Waste and Prevention Rule. Even more disconcerting is that the agency appears to be fast-tracking this rollback without holding a single hearing in any western state where oil and gas development on public lands takes place.

Western Leaders Network

1309 East 3rd Avenue • Suite 22 • Post Office Box 4433 • Durango, Colorado 81302

970-317-4264 • westernleaders.org

This stands in stark contrast with how the agency developed the original 2016 BLM methane waste rule.

Finalized in 2016, the BLM methane rule was developed over an exhaustive three-year process. That process included nearly a dozen public hearings and listening sessions held around the West and in Washington D.C., in-person stakeholder meetings and a public comment period that generated more than 330,000 comments. The vast majority of those comments supported cutting methane waste.

Tens of millions of royalty dollars are wasted each year as a result of wasted natural gas. According to a 2014 report, American taxpayers would lose upwards of \$800 million in royalty dollars over the next 10 years under the previous regulatory regime, which failed to address methane waste and pollution. More than half of those royalty dollars go to energy-producing states and provide critical funding for communities that are allocated for vital community infrastructure projects such as roads and bridges, K-12 and higher education, mitigation projects to offset the impact of development, and other projects that build strong, diversified local economies.

Time and time again, western stakeholders and the American public have voiced their support for the 2016 BLM methane rule. In May 2017, a bipartisan majority in the U.S. Senate rejected a Congressional Review Act resolution that would have repealed the rule. A January 2018 Colorado College poll found that 75 percent of Westerners support rules to cut methane waste, including a majority of Republicans, Democrats and Independents. And in February 2018, a federal court issued a preliminary injunction that reinstated the 2016 BLM methane rule citing “irreparable harm” to western stakeholders. The public, our lawmakers and our courts have spoken. More importantly, this rollback will come at a great cost to western communities, taxpayers and our energy security. According to your agency’s own analysis, repealing the rule and returning to the 40-year-old legal framework will cost Americans more than \$850 million in wasted natural gas, \$250 million in new pollution costs and tens of millions of dollars in lost royalty revenue.

To roll back the rule without holding a single hearing in the West disregards the voices of local elected officials, tribal leaders, methane mitigation service and technology companies, farmers and ranchers, public health experts, conservationists and many, many others.

We ask that you respect the overwhelming public support of western stakeholders and leave this commonsense rule intact. And at a minimum, BLM should extend the public

comment period by 60 days and schedule a series of public hearings in states throughout the West before moving forward with this ill-conceived proposal.

Sincerely,

Arizona

Lena Fowler
Coconino County Board Supervisor

Colorado

Nicole Johnston
Aurora City Councilor

Auden Schendler
Basalt Town Councilor

Deb Gardner
Boulder County Commissioner

Elise Jones
Boulder County Commissioner

Suzanne Jones
Mayor, City of Boulder

Mary Dolores Young
Boulder City Councilor

Sam Weaver
Boulder City Councilor

Robin Kniech
Denver City Councilor

Jill Ryan
Eagle County Commissioner

Gail Watson
Gilpin County Commissioner

John Messner
Gunnison County Commissioner

Gwen Lachelt
La Plata County Commissioner

Wally White
Former La Plata County Commissioner

Christine Berg
Mayor, City of Lafayette

Jamie Harkins
Lafayette City Councilor

Polly Christensen
Mayor Pro Tem, City of Longmont

Joan Peck
Longmont City Councilor

Robert Muckle
Mayor, City of Louisville

Connie Sullivan
Mayor, Town of Lyons

Jenny Willford
Northglenn City Councilor

Steve Child
Pitkin County Commissioner

George Newman
Pitkin County Commissioner

Greg Poschman
Pitkin County Commissioner

Rachel Richards
Pitkin County Commissioner

Tim Corrigan
Routt County Commissioner

Hilary Cooper
San Miguel County Commissioner

Joan May
San Miguel County Commissioner

Karn Stiegelmeier
Summit County Commissioner

Shannon Bird
Westminster City Councilor

David Munk
Vice Chairman, Holy Cross Energy

Britt Bassett
La Plata Electric Association Board
Director

Jenny Russell
Southwestern Water Conservation
District Board Member

Idaho

Jacob Greenberg
Blaine County Commissioner

Angenie McCleary
Blaine County Commissioner

Nevada

Debra March
Mayor, City of Henderson

Daniel Corona
Mayor, City of West Wendover

New Mexico

Jim Baca
Former Mayor, City of Albuquerque
Former New Mexico Commissioner of
Public Lands

Isaac Benton
Albuquerque City Councilor

Pat Davis
Albuquerque City Councilor

Tim Keller
Mayor, City of Albuquerque

Rosalyn Fry
Aztec City Commissioner

Maggie Hart Stebbins
Bernalillo County Commissioner

Debbie O'Malley
Bernalillo County Commissioner

Billy Garrett
Doña Ana County Commissioner

Ken Miyagashima
Mayor, City of Las Cruces

Gill Sorg
Las Cruces City Councilor

Rock Ulibarri
San Miguel County Commissioner

Chris Calvert
Former Santa Fe City Councilor

David Coss,
Former Mayor, City of Santa Fe

Michael Harris
Santa Fe City Councilor

Peter Ives
Santa Fe City Councilor

Renee Villarreal
Santa Fe City Councilor

Alan Webber
Mayor, City of Santa Fe

Anna Hansen
Santa Fe County Commissioner

Steve Green
Mayor, City of Truth or Consequences

Tim Eichenberg
New Mexico State Treasurer

Deborah Armstrong
New Mexico State House Representative

Gail Chasey
New Mexico State House Representative

Damon Ely
New Mexico State House Representative

Joanne Ferrary
New Mexico State House Representative

Doreen Gallegos
New Mexico State House Representative

Stephanie Garcia Richard
New Mexico State House Representative

Georgene Louis
New Mexico State House Representative

Antonio Maestas
New Mexico State House Representative

Javier Martinez
New Mexico State House Representative

Bill McCamley
New Mexico State House Representative

Matthew McQueen
New Mexico State House Representative
District 50

Andres Romero
New Mexico State House Representative

Angelica Rubio
New Mexico State House Representative

Debra Sariñana
New Mexico State House Representative

Nathan P. Small
New Mexico State House Representative

Elizabeth Thomson
New Mexico State House Representative

Linda M. Trujillo
New Mexico State House Representative
District 48

Jacob Candelaria
New Mexico State Senator

Richard C. Martinez
New Mexico State Senator
District 5

Gerald Ortiz y Pino
New Mexico State Senator
District 12

Bill Soules
New Mexico State Senator

Liz Stefanics
New Mexico State Senator

Jeff Steinborn
New Mexico State Senator

Mimi Stewart
New Mexico State Senator

Peter Wirth
New Mexico State Senator, Majority
Leader

North Dakota
Tim Mathern
North Dakota State Senator

Utah
Rani Derasary
Moab City Councilor

Wyoming
Greg Epstein
Teton County Commissioner

Pete Muldoon
Mayor, City of Jackson