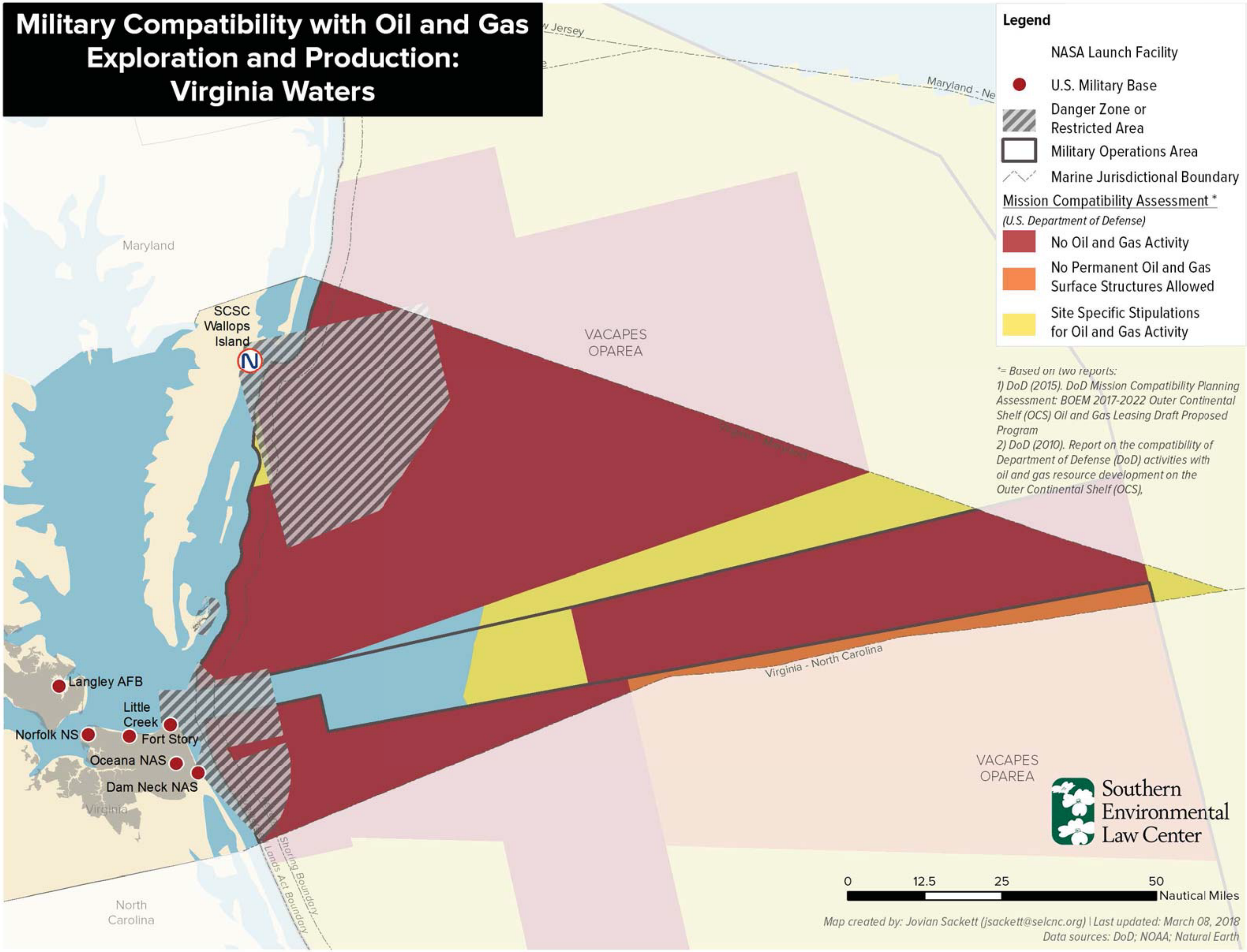
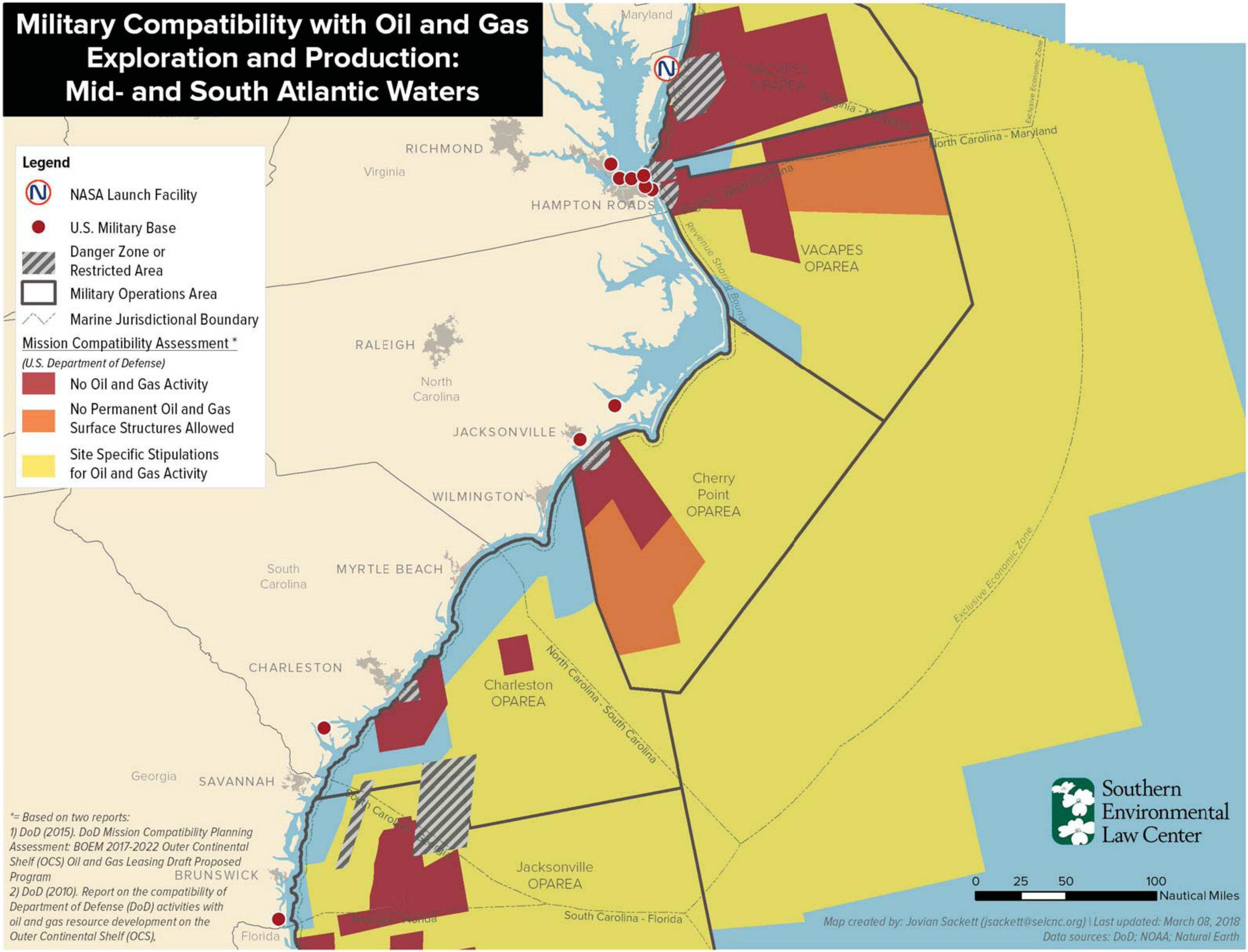
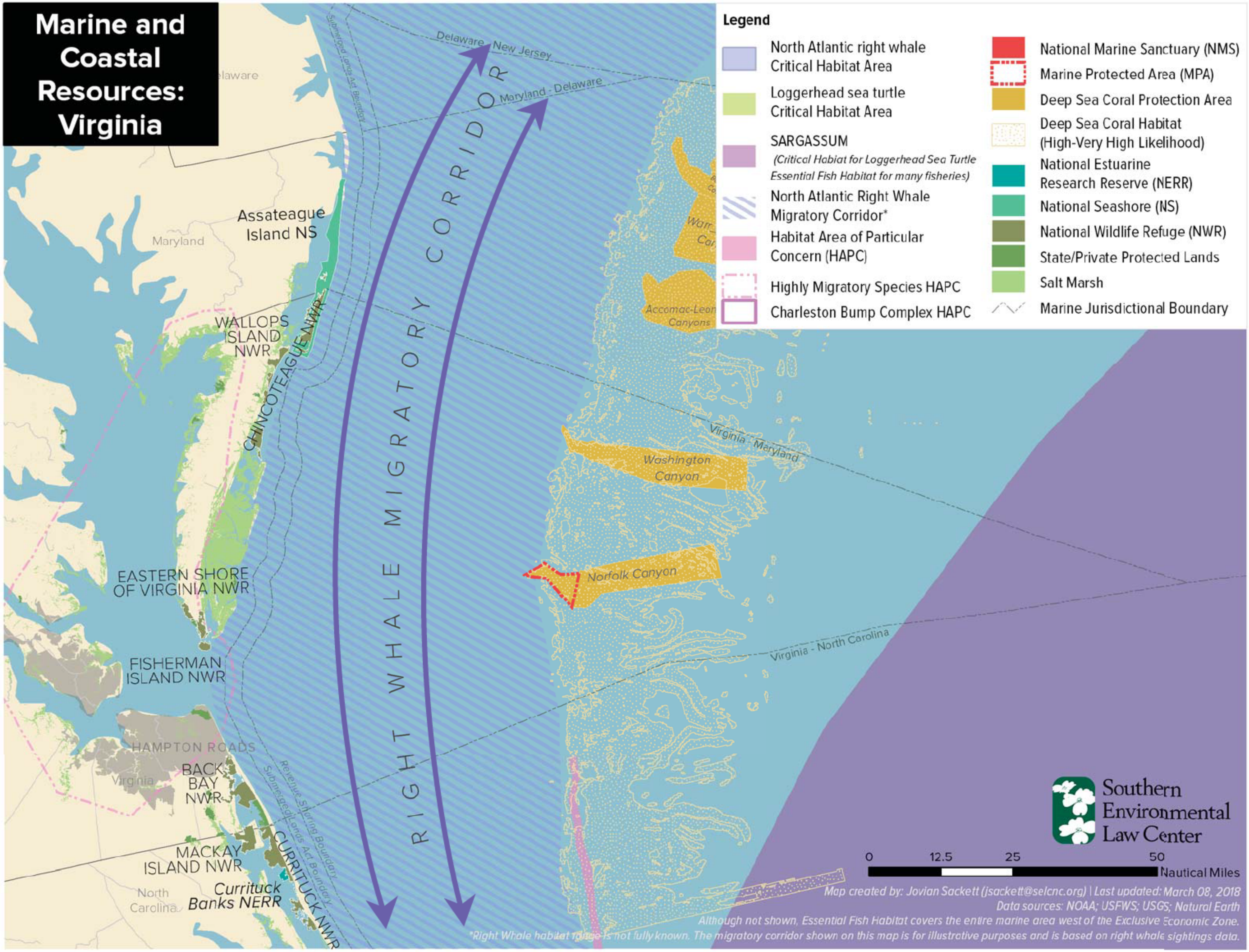
Military Compatibility with Oil and Gas Exploration and Production: Virginia Waters

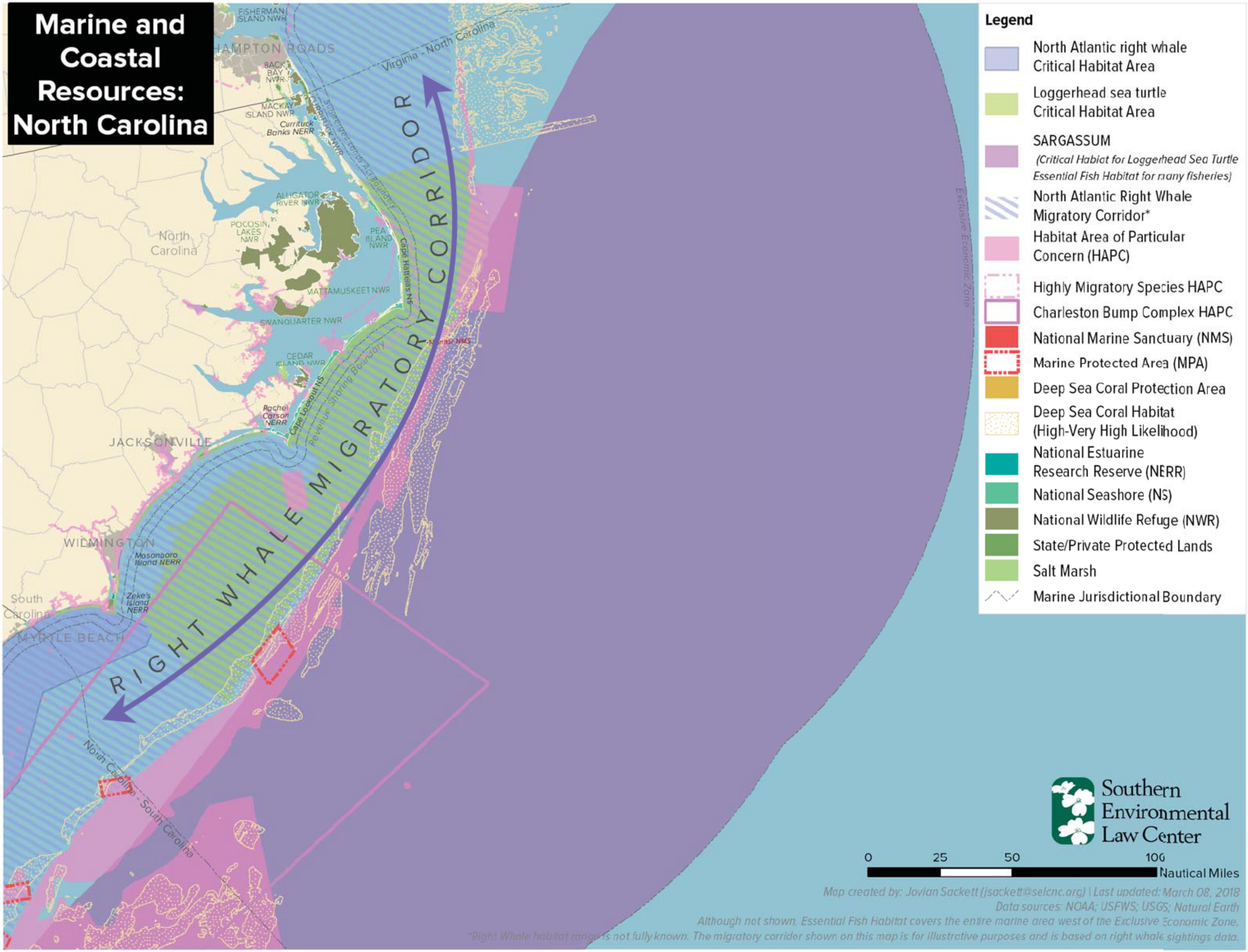



Military Compatibility with Oil and Gas Exploration and Production: Mid- and South Atlantic Waters
Legend
NASA Launch Facility
U.S. Military Base
Danger Zone or Restricted Area
Military Operations Area
Marine Jurisdictional Boundary
Mission Compatibility Assessment *
(U.S. Department of Defense)
No Oil and Gas Activity
No Permanent Oil and Gas Surface Structures Allowed
Site Specific Stipulations for Oil and Gas Activity
Maryland
RICHMOND
Virginia
HAMPTON ROADS
VACAPES OPAREA
VACAPES OPAREA
North Carolina - Maryland
Revenue Sharing Boundary
Exclusive Economic Zone
RALEIGH
North Carolina
JACKSONVILLE
WILMINGTON
Cherry Point OPAREA
South Carolina
MYRTLE BEACH
CHARLESTON
Charleston OPAREA
North Carolina - South Carolina
Georgia
SAVANNAH
BRUNSWICK
Jacksonville OPAREA
South Carolina - Florida
Florida
0 25 50 100 Nautical Miles
Southern Environmental Law Center
*= Based on two reports:
1) DoD (2015). DoD Mission Compatibility Planning Assessment: BOEM 2017-2022 Outer Continental Shelf (OCS) Oil and Gas Leasing Draft Proposed Program
2) DoD (2010). Report on the compatibility of Department of Defense (DoD) activities with oil and gas resource development on the Outer Continental Shelf (OCS).
Map created by: Jovian Sackett (jsackett@selcnc.org) | Last updated: March 08, 2018
Data sources: DoD; NOAA; Natural Earth

ATTACHMENT 2



Marine and Coastal Resources: Virginia
Legend
North Atlantic right whale Critical Habitat Area
Loggerhead sea turtle Critical Habitat Area
SARGASSUM
(Critical Habitat for Loggerhead Sea Turtle Essential Fish Habitat for many fisheries)
North Atlantic Right Whale Migratory Corridor*
Habitat Area of Particular Concern (HAPC)
Highly Migratory Species HAPC
Charleston Bump Complex HAPC
National Marine Sanctuary (NMS)
Marine Protected Area (MPA)
Deep Sea Coral Protection Area
Deep Sea Coral Habitat (High-Very High Likelihood)
National Estuarine Research Reserve (NERR)
National Seashore (NS)
National Wildlife Refuge (NWR)
State/Private Protected Lands
Salt Marsh
Marine Jurisdictional Boundary
RIGHT WHALE MIGRATORY CORRIDOR
Delaware - New Jersey
Maryland - Delaware
Virginia - Maryland
Virginia - North Carolina
Submerged Lands Act Boundary
Revenue Sharing Boundary
Assateague Island NS
Maryland
WALLOPS ISLAND NWR
CHINCOTEAGUE NWR
EASTERN SHORE OF VIRGINIA NWR
FISHERMAN ISLAND NWR
HAMPTON ROADS
Virginia
BACK BAY NWR
MACKAY ISLAND NWR
North Carolina
Currituck Banks NERR
CURRITUCK NWR
Accomac-Leon Canyons
Washington Canyon
Norfolk Canyon
Southern Environmental Law Center
0 12.5 25 50 Nautical Miles
Map created by: Jovian Sackett (jsackett@selcnc.org) | Last updated: March 08, 2018
Data sources: NOAA; USFWS; USGS; Natural Earth
Although not shown, Essential Fish Habitat covers the entire marine area west of the Exclusive Economic Zone.
*Right Whale habitat range is not fully known. The migratory corridor shown on this map is for illustrative purposes and is based on right whale sightings data.


Marine and Coastal Resources: North Carolina
Legend
North Atlantic right whale Critical Habitat Area
Loggerhead sea turtle Critical Habitat Area
SARGASSUM
(Critical Habiat for Loggerhead Sea Turtle Essential Fish Habitat for many fisheries)
North Atlantic Right Whale Migratory Corridor*
Habitat Area of Particular Concern (HAPC)
Highly Migratory Species HAPC
Charleston Bump Complex HAPC
National Marine Sanctuary (NMS)
Marine Protected Area (MPA)
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Deep Sea Coral Habitat (High-Very High Likelihood)
National Estuarine Research Reserve (NERR)
National Seashore (NS)
National Wildlife Refuge (NWR)
State/Private Protected Lands
Salt Marsh
Marine Jurisdictional Boundary
RIGHT WHALE MIGRATORY CORRIDOR
FISHERMAN ISLAND NWR
HAMPTON ROADS
BACK BAY NWR
MACKAY ISLAND NWR
Currituck Banks NERR
Virginia - North Carolina
ALLIGATOR RIVER NWR
POCOSIN LAKES NWR
PEA ISLAND NWR
North Carolina
MATTAMUSKEET NWR
SWANQUARTER NWR
CEDAR ISLAND NWR
Cape Hatteras NS
Cape Lookout NS
Rachel Carson NERR
Revenue Sharing Boundary
JACKSONVILLE
WILMINGTON
Masonboro Island NERR
Zeke's Island NERR
South Carolina
MYRTLE BEACH
North Carolina - South Carolina
Exclusive Economic Zone
Southern Environmental Law Center
0 25 50 100
Nautical Miles
Map created by: Jovian Sackett (jsackett@selcnc.org) | Last updated: March 08, 2018
Data sources: NOAA; USFWS; USGS; Natural Earth
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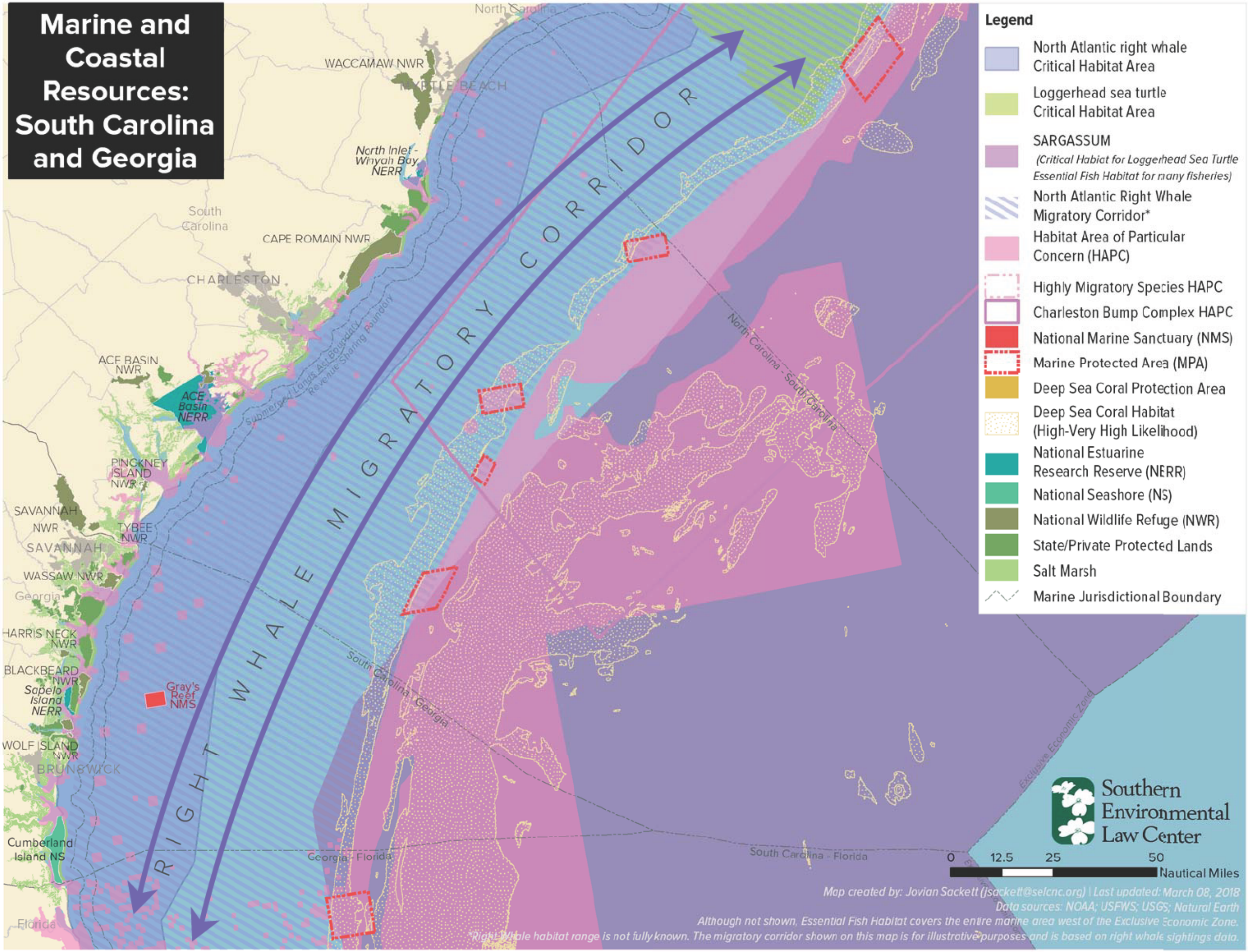

Marine and Coastal Resources: South Carolina and Georgia
RIGHT WHALE MIGRATORY CORRIDOR
North Carolina
WACCAMAW NWR
MYRTLE BEACH
North Inlet - Winyah Bay NERR
South Carolina
CAPE ROMAIN NWR
CHARLESTON
ACE BASIN NWR
ACE Basin NERR
Submerged Lands Act Boundary
Revenue Sharing Boundary
PINCKNEY ISLAND NWR
SAVANNAH NWR
TYBEE NWR
SAVANNAH
WASSAW NWR
Georgia
HARRIS NECK NWR
BLACKBEARD NWR
Sapelo Island NERR
Gray's Reef NMS
WOLF ISLAND NWR
BRUNSWICK
Cumberland Island NS
Florida
Georgia - Florida
South Carolina - Georgia
North Carolina - South Carolina
South Carolina - Florida
Exclusive Economic Zone
Legend
North Atlantic right whale Critical Habitat Area
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Salt Marsh
Marine Jurisdictional Boundary
Southern Environmental Law Center
0
12.5
25
50
Nautical Miles
Map created by: Jovian Sackett (jsackett@selcnc.org) | Last updated: March 08, 2018
Data sources: NOAA; USFWS; USGS; Natural Earth
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*Right Whale habitat range is not fully known. The migratory corridor shown on this map is for illustrative purposes and is based on right whale sightings data.

From: Jennette King
To: Energy Review
Cc: Rikki Hrenko-Browning; Jennette King
Subject: [EXTERNAL] UPA Comments for Federal Oil & Gas Permitting Review - See attached
Date: Monday, April 12, 2021 2:26:18 PM
Attachments: Fed O&G Permitting Review Comments UPAV2.docx
ATT00001.htm
ATT00002.htm

To Secretary Haaland and Interior Leadership,

Please find below the attached comments from Utah Petroleum Association regarding the comprehensive review of the federal oil and gas program as called for in Executive Order 14008. We appreciate the opportunity to have our comments considered in the Interior's interim report.

Utah Petroleum Association

6905 S. 1300 E. #288, Cottonwood Heights, UT 84047-1817

FUELING UTAH'S GROWTH & PROSPERITY

Delivered Via Email

April 12, 2021

U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240
Email: energyreview@ios.doi.gov

Dear Secretary Haaland and Interior Leadership,

The Utah Petroleum Association (UPA) submits the following comments regarding the comprehensive review of the federal oil and gas program as called for in Executive Order 14008.

UPA is a statewide oil and gas trade association established in 1958 representing companies involved in all aspects of Utah's oil and gas industry. UPA members range from independent producers, to midstream and service providers, to major oil and natural gas companies widely recognized as industry leaders. UPA represents Utah's oil and gas workers, and celebrates their role in delivering safe, clean and local energy that drives Utahns and our way of life.

First and foremost, we respectfully ask for a voice in this review process. As an association representing the natural gas and oil industry embedded in communities across our state, we are disappointed the March 25th public forum did not include a single state or local voice representing the hardworking men and women who produce safe, reliable and sustainable energy to fuel our lives. We speak for the people whose lives and livelihoods will be most impacted by President Biden's orders impacting exploration and production on federal lands. A return to centralized decision making by officials thousands of miles away from the people, the land, and the waters where the impacts, both positive and negative, are most deeply felt is not a constructive path forward. We are hopeful the exclusion of state and local voices, of which are the most in tune with how the federal leasing process works and its impacts on local communities, is not indicative of a pattern by this Administration of disregarding the views and desires of our states, our local communities, and many of our residents' livelihoods.

UPA and our members are concerned with the direction of the proposed changes to the Department of Interior's oil and natural gas leasing program for onshore federal lands. Federal lands and waters together accounted for 22 percent of total U.S. oil production and 12 percent of U.S. natural gas production in 2019, according to the Energy Information Administration. Here in Utah, nearly 56% of oil and natural gas wells are located on federal lands. Further, nearly two-thirds of the land in Utah is federally managed, following only Nevada amongst the states with the largest percentage of federally managed public lands. The resulting checkboard land pattern of intermingled federal, state, tribal and private lands means that any changes that disincentivize production on federal lands are also likely to disincentive production on other nearby lands. Due to the large proportion of federal acreage in our state, the anticipated changes to federal leasing significantly puts at risk the investment appetite and competitiveness of the state's resources much more broadly.

Potential decreases in production due to leasing, permitting and other changes being reviewed and contemplated by the Department will have far reaching negative effects on the state of Utah. Beyond driving investment to other states with less federal lands, local communities will see a reduction in the tax base that provides for essential government services such as infrastructure, emergency responders, and education. Property taxes will increase, as will unemployment. In Duchesne County, the oil and gas industry is the largest private employer and is in the top ten in Uintah county. In Utah, oil, gas and mining jobs are some of the highest paid wages in the state, neck and neck with IT. These jobs provide wages that are more than 65% higher than the average wages in the county and more than 400-500% higher than leisure and hospitality wages in the counties that will be most directly impacted.

Looking statewide, year over year Utah leads our nation's economy. Again, this March, US News & World Report ranked Utah's economy as No. 1 among all 50 states. That economic success is underpinned by stable and affordable energy. As of 2019, 88.6% of Utah's energy generation was from fossil fuels. Utah also has one of the nation's lowest energy prices. Similarly, we would encourage the administration to consider the impact their policies will have on fuel prices, particularly in the western US and rural areas of our state where the need to travel farther distances results in a greater economic cost to these families. While electric vehicles, hybrids, and other alternative vehicle types are growing as a percentage of the fleet, between 1999-2019 hybrid electric vehicles have made up only 1.6% of US light duty vehicle sales. For the near and medium term, gasoline prices will continue to be a key concern for US families. In Utah, much of the gasoline that resident's fill their vehicles with comes from crude oil both produced and refined in the state. Assuming that demand will remain fairly consistent in the short and medium term, the impact of reducing in state production is very likely to lead to higher fuel prices. Those increased fuel prices will place a greater burden on our middle class and rural residents. Those very real costs to Utah families are unlikely to provide the policy objectives being purported as the driver for this permitting review – particularly in terms of climate change impacts and federal lands conservation.

The natural gas and oil industry in the United States has been successful in reducing greenhouse gas emissions to generational lows through technology, innovation and collaboration. According to the EIA, from 2014 to 2019, CO2 emissions in the U.S. declined by 5% across the economy and 21% in the power sector. Additionally, over the past decade, methane emission rates relative to production in the key producing U.S. basins have declined nearly 70 percent.

Further, we believe Utah already provides a model of successful multiple use. Congress has mandated that mineral production on federal lands is one of many uses for federal lands, along with recreation, agriculture, and multiple other uses. Utah has taken a balanced approach and is proud to support both a successful natural gas and oil industry as well as a successful tourism and outdoor recreation industry. The narrative that these sectors are mutually exclusive is proved false in Utah. It's also important to keep in mind that these dual successes are found in a state that already has approximately 40% of its public lands under some form of additional protection.

Our industry is an industry of problem-solvers and we look forward to working with stakeholders of all kinds to address climate change and true multiple use of our federal lands, while providing the affordable, environmentally friendly energy that powers our daily lives. The Utah Petroleum Association supports innovative, collaborative solutions that lower methane and greenhouse gas emissions while meeting the world's growing need for abundant, low cost, reliable energy. We believe that any policy around energy and climate change should balance economic, environmental and energy security needs, ensure that energy producing states are not penalized disproportionately to other states, and utilize predictable and economically efficient policy frameworks. We also believe that in order to seek out that balance, local stakeholders closest to the issues need a legitimate voice in the process and we are disappointed with the administration's failure to consult with and acknowledge those voices to date. Successful public policy must recognize that oil and gas underpin our standard of living and American oil and gas is critical to our national security and economic prosperity, particularly here in the state of Utah.

Thank you for this opportunity, and we look forward to future opportunities to work with the Department of the Interior to address these important issues.

Regards,

Rikki Hrenko-Browning, President
Utah Petroleum Association

From:	Robert Dillon
To:	Energy Review
Subject:	[EXTERNAL] Written comments on Interior federal oil and gas leasing
Date:	Wednesday, April 14, 2021 9:39:27 PM
Attachments:	Canary_Letter_Interior_Fed_Oil_Leasing_4_14_2021.pdf

Please find attached written comments from Canary oil field services company CEO Dan Eberhart on DOI's moratorium on new oil and gas leasing on federal lands.

Sincerely,
Robert Dillon
Director

t (480) 426-8710 | m (202) 285 6783
e rdillon@eberhartcapital.com

U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240
energyreview@ios.doi.gov

April 14, 2021

Re: Interior's interim report on federal oil and gas leasing program

To Whom It May Concern:

As Department of Interior (DOI) has moved, at the direction of President Biden, to consider a long-term moratorium on new oil and gas leases on federal lands, some have attempted to downplay the consequences of such action. They reason that only a fraction of American oil and gas production – about a quarter of oil and a tenth of gas production – takes place on federal lands. While this may be true in a larger context, the reality in Western States is that fossil fuel production and federal lands are intimately linked. Consequently, a ban on federal oil and gas leases would be crippling to our industry.

As the owner of a major oilfield services provider, I can attest that it is virtually impossible to avoid federal lands when it comes to energy production. Most shale or "tight" gas plays straddle federal lands, meaning one can't simply zig-zag their way through underground rocks to avoid federal mineral deposits. If they could do so, they would, as operating on federal lands is a costly and bureaucratic process that often delays projects. Given this reality, one in which operators need federal land to explore and extract energy, the moratorium DOI is considering could strangle oil and gas development in the West.

The consequences of this proposal are many. First, the federal government and state governments stand to lose much-needed revenue. Just last month, DOI announced nearly $249 million for Alabama, Louisiana, Mississippi, and Texas for coastal conservation, restoration and hurricane protection programs. These are critical conservation funds not easily replaced in states grappling with a COVID economy. Added to these funds are billions in revenue for U.S. and state governments, a figure that totaled $12 billion from energy production on federal lands and waters in 2019 alone. In fact, one study suggests that eight Western states stand to lose $110 billion in tax revenues under a ban on federal leasing.

Added to a loss of tax revenue will be losses in energy production and energy jobs. One estimate finds that the U.S. will be forced to import another 2 million barrels per day of imported oil under a leasing ban and suffer the elimination of nearly 1 million American jobs. These are consequences the U.S. can ill afford. Moreover, a leasing ban could actually increase American coal use by 15% by 2030, increasing carbon emissions at a time when the president is making laudable headway in the fight against climate change.

By reversing course on a federal leasing ban, we have a chance to continue a legacy of strong bipartisan support for responsible oil and gas exploration on federal lands. It was none other than President Obama who in 2012 who took pride in the fact that the U.S. was experiencing more drilling on public lands than in the administration preceding his. Previous administrations understood the potential of U.S. oil and gas production to create jobs, provide cleaner burning energy sources that combat climate change, and set the U.S. on a course toward energy independence.

I join with others in the energy service industry in urging DOI to roll back its ban on federal leasing and allow oil and gas production, particularly in the West, to continue providing massive benefits to the U.S. economy.

For further edification, please consider my writings from *Forbes* earlier this year on the federal leasing included below.

Best regards,

Dan K. Eberhart, CEO
Canary, LLC

Feb 17, 2021, 01:00pm EST

Federal Leasing Ban Will Impact Western Shale Producers For Years

Dan Eberhart | Contributor

After the Biden administration took steps to suspend new oil and gas permits and halt lease sales on federal lands and waters, there's been much talk about how the move wouldn't impact the energy industry too dramatically.

The theory went that only a sliver of U.S. output – about 25 percent of oil and 10 percent of gas – is produced on federal lands and waters. The vast majority of operations are on private lands. It was also noted that the Biden administration wasn't turning off the faucet entirely. Companies that already hold acreage and permits to drill may continue, and indeed, many have stockpiled federal drilling permits in recent months, limiting the near-term impacts on production.

While all true, those arguments ignore the troublesome side effects of Biden's actions. In the West, for instance, Biden's restrictions could have a much more significant impact by strangling gas development in the region – and not just on federal lands.

Any gas producer in the West will tell you that it's almost impossible to avoid federal lands, even if when drilling on state or privately held acreage because most shale or "tight" gas plays straddle federal lands.

That is the nature of horizontal drilling and fracking. The technology and drilling strategies that made the shale revolution possible – and turned pre-pandemic America into the world's top oil and gas producers – allows drillers to unlock resources underground miles from the drill pad.

As the head of a major oilfield services provider, I can tell you that operators can't just zigzag their way through underground rocks to avoid federal mineral deposits. Believe me, if producers could operate only on non-federal land, they would do it, because federal land is more costly, and the bureaucratic process required to begin operations takes longer.

Gas-prone plays that fall under a great deal of federal control include the Powder River Basin of Wyoming, Colorado's Piceance Basin, and Utah's Uintah Basin. In areas like these, it often requires an adjacent lease on nearby land to optimize extraction of the gas reserves in shale rocks, whether because of geology or topography. Under Biden's crackdown, if any of that land is federal, the entire project would be blocked.

It's also not uncommon for producers to try to develop a water well on private, state or tribal land but run into ownership issues. The nature of land ownership in the West is such that there is often a closely interlocking patchwork of land ownership – with tribal lands next to federal plots, next to private areas, next to state lands. That points to more above ground and sub-surface issues as the Biden restrictions take effect.

On Jan. 27, Biden directed the Interior Department to pause all new oil and gas leasing on federal lands and waters indefinitely, following through on a campaign pledge to satisfy the anti-fossil fuel segment of his coalition.

Interior says the pause will allow it to examine whether its leasing program serves the public interest and is striking the appropriate balance with competing priorities, such as climate change, wildlife habitat and clean water.

The oil industry, particularly Western producers, will no doubt strongly oppose restrictions in public comments to Interior. The review is so complex that it could take years to accomplish, which effectively moves it from a temporary ban to a long-term moratorium.

The Interior Department under Biden is trying to justify the ban by saying that 26 million onshore federal acres are currently leased to oil and gas companies, and 53 percent of those leases are considered unused or nonproducing. The industry is also "sitting on" 7,700 approved permits to drill, Interior says.

But the argument that the industry has plenty of unused drilling permits to keep it busy is a blanket statement that doesn't apply to every company. Just because one firm has enough leases in its back pocket doesn't mean that another does. Management teams run companies differently based on market conditions and strategic priorities.

The broader Biden goal is to reach national carbon neutrality by 2050 in line with targets set by a growing number of nations and corporations, which would require fossil fuels to be gradually phased out or paired with carbon offset or capture technology.

That is a tall order for the world's largest oil and gas producer. And it's why some industry officials hope to persuade the Biden administration to ease up on restrictions. Eventually, industry believes the moderate, centrist Biden will reemerge.

In today's highly polarized political environment, though, that may be wishful thinking. It's no surprise that top industry groups, including the Western Energy Alliance, are already filing legal challenges against the administration.
The Alliance reckons the Biden ban on public lands will cost the U.S. economy $670 billion over the next 20 years and hammer jobs in an industry already struggling after two price collapses over the past six years.

In court, the outlook for producers is much better. After all, the primary law governing federal leasing and permitting is the Mineral Leasing Act, which states that the Interior Secretary shall hold quarterly lease sales. Shall, not may. That's about as cut and dry as it gets.

From:	John Rader
To:	Energy Review
Subject:	[EXTERNAL] Wyoming Outdoor Council member lease reform comments
Date:	Thursday, April 15, 2021 3:31:41 PM
Attachments:	WOC member public comments - lease reform.pdf ATT00001.htm

Hello, and thank you for accepting public comments on reforming federal minerals leasing.

The Wyoming Outdoor Council is Wyoming's oldest independent statewide conservation organization. Our members enjoy a wide range of activities on federal public lands, and while we appreciate the importance of federal minerals development to Wyoming's economy, we also recognize the need for balanced management and a fair return.

The Outdoor Council submitted comments separately alongside other local and national conservation organizations. The attached document is a compilation of comments from our members.

Best,
John

Submitted online to energyreview@ios.doi.gov
April 15, 2021

Re: Wyoming Outdoor Council member comments on federal oil and gas leasing reform

Stop giving away our mineral resources. We need reform of the leasing system to protect the other values of our public lands.
Brian J. Parker
Spokane, Washington

I believe the primary use of the national forests should be for 'quiet', i.e., non-motorized recreational use, such as hunting, fishing, hiking, camping, etc., and extractive industries such as logging, mining, grazing, ski resorts, fossil fuel development, etc. should be permitted only in those rare instances they do not interfere with non-motorized recreation and any damage to the land, including forests and water resources, is minor, temporary and can be easily remediated. I also believe that user fees for extractive industries should be at market rates and not subsidized by taxpayers.
Robert Handelsman
Evanston, Illinois

It is long past time to stop mineral and oil extraction on federal lands. Please stop subsidizing the mineral, oil, and gas industries.
Robert Skaggs
Jackson, Wyoming

I'm a native Wyomingite and have worked in the oilfield as a college student. My Dad worked for [redacted] for 37 years. There's no question that extractive industries have played a huge part in building the infrastructure and economy of Wyoming. But our nation, and indeed the world, are facing new realities regarding climate change. It would be not only stupid to continue ignoring this issue, but suicidal as well. Wyoming must start re-structuring its economy for a future with far less fossil fuel consumption. We need to stop bending over backward to allow extractive industry to write our laws and police their own actions. Royalty rates have been opaque to the public at large, and nobody really believes the state has gotten a fair share of the billions of dollars generated by our resources. We need to focus on fair payment of royalties, outside accounting, and above all, the gradual reduction in overall leases granted, with an eye toward a new economy. Furthermore, we need to value other uses of public lands in our state. We must protect wildlife, maintain clean air and water, and create a sustainable future for upcoming generations. We've been acting like it's our right to take everything we can produce

for ourselves with no thought for those who follow. I hope I live long enough to see these greedy policies that benefit the few at the expense of the many, to change once and for all.
Jeffrey Troxel
Missoula, Montana

End noncompetitive leasing. These “over the counter” lease sales encourage speculators to nominate large swaths of public land for leasing, then snatch up unsold parcels at discounted rates. Noncompetitive leases almost never produce oil or gas and are a waste of agency resources. Increase the minimum bid, which currently stands at $2/acre, and increase the royalty rate for onshore oil and gas, which is lower than the royalty rates for state, private, and offshore minerals. Stop leasing of low potential lands that are unlikely to ever produce oil or gas, and could be better managed for wildlife habitat, recreation, or other uses. Respect the Bureau of Land Management’s “multiple use mandate,” which requires that industrial development on public lands be balanced with the many other values these lands provide. The public should share in any profits made from exploration when and only when the ecosystems are not damaged at which time NO LEASING.
Patrick Dominick
Jackson, Wyoming

Climate change is already here. We need regulatory and legal change to acknowledge our imperiled future on Earth. I'd be happy if there was never another acre of federal leased for fossil fuel extraction.
Eric Dalton
Cheyenne, Wyoming

Dear fellow civil servants at the DOI, I work in local government in western Wyoming, and while there isn’t any energy exploration and extraction right where I call home, it’s right at our back door. In fact, Energy permeates our great state. I’m a realist. I don’t expect oil and gas to evaporate overnight. I think there’s a middle ground on the path to clean Energy. With a balanced approach to leasing practices, we might increase revenue and limit the physical impact on the land. Open, undeveloped land in Wyoming IS a resource of intrinsic value even if no one is extracting anything of monetary value from it. I support raising lease bid pricing a bit and limiting exploration of oil and gas to land with a high probability of producing. I want to close with something to consider. Why isn’t geothermal being more seriously explored in Wyoming? Thank you for your good work and your careful consideration of oil and gas leasing in our state.
Warren Pennick
Alta, Wyoming

I know this is a hard sell in Wyoming, but I believe the pause in leasing should be made permanent. Wyoming needs to transition away from fossil fuels and preventing additional leases

would be a good start. Also, increasing royalties on existing leases and requiring companies to cap wells and mitigate environmental damage should also be part of any reform.
Alison Jones
Jackson, Wyoming

I support oil & gas leasing reform.
Curtis Johnson
Green River, Wyoming

Waste and fraud hurt tax payers who are due a reasonable return on our public lands leased for extraction of any kind. Oil and gas companies have been inducing the federal government to lease huge swaths of our public lands which have fueled speculation, non-competitive bidding, and a lack of actual extraction. This waste is simply unacceptable. Additionally, the BLM is mandated to manage BLM lands as multiple use, however it seems that the agency has been laser focused on only one use in Wyoming and that is oil and gas leasing. Agencies need to better evaluate how and when they lease public lands for oil and gas extraction. There are many competing uses and values expressed on and through our public lands, these uses deserve the full consideration and weight that extraction gets. In particular lands that are sacred and cultural sites to Native Americans should simply be off-limits, we have important wildlife migration corridors and wintering ranges that need to be protected, people recreating (including hunting) use these lands, and finally these lands contribute to our waterways and impact our air quality. I fully support leasing reform.
Ryan Sedgeley
Yellowstone National Park, Wyoming

It is long overdue for Wyoming to start reforming oil and gas leasing. Let's not continue to pollute our beautiful state, destroy wildlife corridors, and ruin our air quality. We are way behind in addressing climate change!
Cindy Booth
Wilson, Wyoming

Oil and Gas leasing reform to me, means NO MORE LEASES. Let the current leases expire. Use current alternative resources and develop CLEAN, RENEWABLE resources. What has happened to American ingenuity? It was flushed with laziness and Big Oil $$$. Oil and Gas AND COAL are destroying migration routes, poisoning drinking water, trashing and raping our, MY planet. Stop. Now. Please stop now, please. YOU KNOW THE TRUTH.
Sandra Werner
Laramie, Wyoming

Exploration for new unconventional resource plays (tight oil and gas/ shale plays) requires access to large areas of continuous acreage (~100,000 acres or larger) to justify the expense of drilling and testing a high risk exploration well. Not many are successful. It takes numerous prospects to be tested to find one viable play like the Bakken or Eagleford. Cheap and large acreage areas are what make the prospects viable and attractive. Raising the minimum bid and cancelling over the counter purchases would destroy the viability of these risky prospects by increasing the costs. Raising the royalty rate will just decrease the bid amounts at auction. The leases are not worth as much if the royalty rate is higher. Take your pick of what the government wants, higher initial bids or higher royalty payments in the future. The reason the government receives less in bids and royalty than similar state and private acreage is because federal acreage is subject to lots of stipulations and regulations not seen on state and private leases. Most of the federal land being leased are in dry barren desolate places in the middle of basins in the west. It is not like they are leasing forest service lands. I can't think of a better place to site industrial development than these isolated places away from people and most wildlife. It is better to have this type of oil field development on federal land where the wildlife is protected by development regulations. The same development on private land would not be as protected.
Mark Fisher
Cody, Wyoming

In general it is considered best practice in every discipline, industry, practice, and facility to routinely review procedures and policies. So please, let us review oil and gas leasing policy and procedures and make continuous and constant improvements.
Madeline Dalrymple
Laramie, Wyoming

Wyoming can generate revenue/work by securing leaking methane. This is a job...oil companies need to work to clean up their mess!
Jeff Jung
Alta, Wyoming

I am writing to state that we don't need to lease more of our public lands to the extractive energy companies. Now is the time to protect these lands for all of the natural uses and ecosystems that already exist on them. The extractive companies don't use most of these leases and just want to tie them up like the railroad did with the alternate sections that the government 'gave' them back during the vast land grab of the 1800s. Most of our income comes from production and this won't be affected by no more leasing and in a few more years, it will become apparent, albeit maybe too late that we can't keep going down the same dead end road towards climate change. NO MORE LEASING.
Juan Laden
Lander, Wyoming

I think all of the below are true and should be changed... End noncompetitive leasing. These "over the counter" lease sales encourage speculators to nominate large swaths of public land for leasing, then snatch up unsold parcels at discounted rates. Noncompetitive leases almost never produce oil or gas and are a waste of agency resources. Increase the minimum bid, which currently stands at $2/acre, and increase the royalty rate for onshore oil and gas, which is lower than the royalty rates for state, private, and offshore minerals. Stop leasing of low potential lands that are unlikely to ever produce oil or gas, and could be better managed for wildlife habitat, recreation, or other uses. Respect the Bureau of Land Management's "multiple use mandate," which requires that industrial development on public lands be balanced with the many other values these lands provide.
Michael Krall
Lander, Wyoming

Hopefully oil and gas leasing pause for review means just that. It does mean a ban on further development. I believe energy development is still an important part of Wyoming's economy and culture. I think energy independence is important for our national security. However, basing our future energy development on a 100 year old law and the benevolence of extractive industries just doesn't make sense. Hopefully science and level heads will carry the day.
Gregory McCue
Cody, Wyoming

I support the following recommendations advocated by the Outdoor Council: Specifically, the Outdoor Council advocates that the federal government: End noncompetitive leasing. These "over the counter" lease sales encourage speculators to nominate large swaths of public land for leasing, then snatch up unsold parcels at discounted rates. Noncompetitive leases almost never produce oil or gas and are a waste of agency resources. Increase the minimum bid, which currently stands at $2/acre, and increase the royalty rate for onshore oil and gas, which is lower than the royalty rates for state, private, and offshore minerals. Stop leasing of low potential lands that are unlikely to ever produce oil or gas, and could be better managed for wildlife habitat, recreation, or other uses. Respect the Bureau of Land Management's "multiple use mandate," which requires that industrial development on public lands be balanced with the many other values these lands provide. Thank you.
Dan McCurdy
Springfield, Illinois

I support the reform of oil and gas leasing for a number of reasons. First, the gas and oil companies are already sitting on many undeveloped leases; if we have an oil or gas shortage, which seems more and more unlikely as auto companies move toward electric vehicles, the companies still have many resources already in their portfolios. Second, the government and the

taxpayers deserve to receive reasonable returns from the leases. Instead they are selling for almost nothing and they are not being developed. This is the rawest form of speculation and the taxpayers, at the State and Federal level, are the big losers. Third, and more importantly, more leases if developed will threaten other natural resources. Much of the area in SW Wyoming is home to the most important sage grouse population in the country and, for that matter, in the world. The sage grouse population is declining. Other wildlife are threatened, especially the deer. The deer population in Wyoming is declining. Oil and gas development threatens the critical wildlife migration corridors.. Finally, when will we bet on the future and not the past, for Wyoming and America and the world? We will use carbon-based fuels for many years still but our government's emphasis should be on the fastest possible transition to renewable energy, not the longest. We do not have the luxury of time. Many thanks for your consideration.
Hap Ridgway
Cody, Wyoming

I endorse WOC's recommendations for an improved system of managing oil and gas on federal lands. Perhaps most important to me is that leases not be made on lands where there is no serious potential of production and/or where oil or gas development will conflict with more enduring values.
Lee Nellis
Saranac Lake, New York

We need to dramatically decrease methane emissions from natural gas and oil production facilities.
John Harkness
Teton Village, Wyoming

Several reforms and/or improvements are needed to the DOI procedures for granting oil and gas leases on federal lands, especially in the West. BLM lands are by law required to be issued by multiple-use criteria. Too often the interests of the extractive and fossil fuel interests are given precedence over non-consumptive uses. In the same vein if energy development is as important as the industry claims, companies should be required to make use of and develop leases in a reasonable time instead of the practice of obtaining leases with the intention of not developing them. The practice of speculative leasing contradicts the argument that opening large areas for leasing is vital when they are not developed but allowed to lay idle for years. A reasonable fee for leasing new areas would discourage this practice.
Werner Studer
Casper, Wyoming

I support the oil and gas industry, but not in every situation. Extreme care must be taken to protect other valued uses and resources. Current leasing practices often facilitate inadequate exploratory, production and mitigation practices. Some lands have such rare and exceptional resource values that they should be excluded from leasing.

Bruce Parker
Casper, Wyoming

Advocating for common sense leasing reforms. April 13, 2021 Dear Department of the Interior, I am writing to you in response to the Wyoming Outdoor Council's appeal for comments in advocating for common sense leasing reforms on public lands. I support the proposals put forward by the Wyoming Outdoor Council regarding: -Ending non-competitive leasing -Increase the minimum bid for leases -Stop leasing of low potential lands -Respect the BLM's multiple use mandate That said, I believe we need to go further with respect to addressing mineral development on public lands. Mineral development on public lands is a large source of greenhouse gases, in particular CO2 and CH4. The response of the fossil fuel industry and their supporters to President Biden's temporary leasing moratorium reminded me of the rationale used by Police Captain Louis Renault in Casablanca when he ordered the shutdown of Rick's Café Americain, "I'm shocked! Shocked to find out there is gambling going on in this establishment!" They pretend to have never heard of human caused global climate change when in fact they have profited off of human caused global climate change for over 100 years. Had these people worked to address human caused global climate change when we all first realized its implications, the steps proposed by the Wyoming Outdoor Council above, may be sufficient to address what was during the Trump administration a literal "Fire Sale" of public lands and resources. They did not. They continued to profit off of the future of our children, our grandchildren, and generations of children to come. Now they are crying, "Foul!" Seriously? Any future leasing of public lands for mineral development should be assessed for their contribution to human caused global climate change and required to completely offset those contributions aiming at a net-zero impact to the global climate. These are our public lands. The people profiting from mineral development on them are contributing to the alteration of the climate of the entire planet. The Department of the Interior needs to hold those people accountable. Thank you for your time and consideration.

Andy Blair
Lander, Wyoming

DRAFT-DELIBERATIVE-PRE-DECISIONAL
FOR INTERNAL DISCUSSION ONLY

DRAFT

REPORT ON THE FEDERAL OIL AND GAS LEASING PROGRAM

Prepared in response to Executive Order 14008

U.S. Department of the Interior

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