

April 22, 2016

Dir. Neil Kornze  
U.S. Department of the Interior  
Bureau of Land Management  
Mail Stop 2134 LM  
1849 C St NW  
Washington, DC 20240

Dear Director Kornze,

**Regarding: 1004-AE14**

Today, we write in support of the U.S. Bureau of Land Management's Natural Gas Waste Rule and urge the BLM to strengthen key provisions and adopt the rule in a timely fashion. We represent organizations and stakeholders that are based in, or have members in, the states directly affected by this rule.

For far too long, oil and gas companies have been allowed to waste natural gas on public and tribal lands through venting, flaring, and leaking. Given the vast majority of energy development on public lands occurs in the Rocky Mountain region, Westerners and western states are disproportionately affected by this issue.

Nationally, upwards of [\\$330 million](#) worth of natural gas is wasted each year. The vast majority of that waste occurs in western and Great Plains states such as Colorado, New Mexico, North Dakota, Utah, and Wyoming.

Wasted natural gas also means tens of millions in lost royalty revenue for local, state, and tribal governments. This revenue loss is especially problematic given the budget challenges these governments currently face. Money that should go to support critical local and state programs – such as education and local infrastructure projects to mitigate the negative impacts associated with energy development in rural areas – instead went up in flames.

One recent report found that the American taxpayer may lose more than [\\$800 million](#) over the next ten years in oil and gas royalties from venting and flaring on public lands if the oil and gas industry continues its current practices.

In addition to addressing lost revenue and energy, the same strategies that oil and gas operators will deploy to cut waste will cut harmful air pollution, including methane (a powerful greenhouse gas and the primary component of natural gas), benzene (a known human carcinogen) and volatile organic compounds or "VOCs" (ozone precursors that [contribute](#) to asthma attacks and harms the health of our seniors).

Air pollution in the West does not stop at state boundaries. For instance, oil and gas development in Utah and New Mexico – two states that lack effective air regulations for industry -- degrades air quality in Colorado, the state with the nation's leading air regulations. A strong BLM rule will level the playing field for industry and reduce pollution across state lines

We appreciate the hard work put forth by the BLM to develop what we think is a strong draft rule. The BLM has conducted an open and inclusive public process by holding a series of listening

sessions in western states and in Washington, D.C. ahead of the draft rule announcement and a series of public hearings during the public comment period in several energy-producing states. Many of us testified at those meeting and hearings. We are grateful for the BLM providing such a robust opportunity to participate in the rulemaking process

We know cutting waste is possible. In 2014, Colorado adopted the first clean air rule in the nation that addressed methane waste. In the two years since the rule's passage, oil and gas [production](#) and the number of active wells increased in the state. Similarly, Wyoming has adopted a clean air strategy for the Upper Green River Basin where oil and gas operators have reported a net-benefit in deploying methane mitigation technologies. The BLM should follow the lead of these western states by adopting this rule.

And while we believe the draft rule is headed in the right direction, there are several areas where we feel the rule should be strengthened and improved. These include:

- 1) **strengthen leak detection and repair** provisions by requiring quarterly inspections and follow the State of Colorado's lead in incentivizing advanced technologies that cut waste;
- 2) **require leading pollution control technologies** wherever possible such as "zero-bleed pneumatic" pumps and controllers;
- 3) **toughen flaring standards** that reduce the amount of flaring over time with the goal of eliminating flaring altogether wherever possible;
- 4) **ensure proper enforcement** so that operators meet new standards aimed at cutting waste; and
- 5) **provide transparency and accountability** in key decision points for implementation such as alternative flaring limits, flaring extension requests, request for a state variance, and drilling permits and waste minimization plans.

A strong BLM natural gas waste rule will be a huge benefit to western states by capturing tens of millions of dollars in taxpayer revenue, creating jobs for westerners in the methane mitigation industry, putting western energy to good use, and cleaning up our air.

Again, we thank the BLM for its hard work in creating an open and transparent process, and we urge the BLM to strengthen and finalize the rule as quickly as possible.

Very sincerely,

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