

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 23, 2018

To the Honorable Interior Secretary Ryan Zinke:

As local, elected leaders from across Montana, we are deeply concerned by the U.S. Bureau of Land Management's recent proposal to repeal major provisions of the 2016 Methane Waste 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.

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 like Montana 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, Montanans and the American public have voiced their support for the 2016 BLM methane waste 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Review Act resolution that would have repealed the rule.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 77 percent of Montanans support rules to cut methane waste. And in February 2018, a federal court issued a preliminary injunction that reinstated the 2016 BLM methane waste 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 Montana’s 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 Montanans 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,

Senator Mary McNally  
*Senate District 24*

Representative Jessica Karjala  
*House District 48*

Senator Margie MacDonald  
*Senate District 26*

Representative Laurie Bishop  
*House District 60*

Senator JP Pomnichowski  
*Senate District 33*

Representative Andrea Olsen  
*House District 100*

Senator Dick Barrett  
*Senate District 45*

Councilwoman Penny Ronning  
*City of Billings*

Councilwoman Corey Thompson  
*City of Red Lodge*