



For America's Heritage

## Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

September 10, 2015

Honorable Sally Jewell  
Secretary of the Interior  
1849 C Street NW  
Washington, D.C. 20240

Dear Madame Secretary:

We are appreciative of the ongoing review and preparation of significant new venting and flaring rules being developed by the Bureau of Land Management to reduce the waste of methane in oil and gas production. We believe prompt action in the consideration, development and publication of the draft rule is essential.

In June of this year, ICF International reported that total methane emissions from U.S. oil and gas are projected to increase 4.5% by 2018 as emissions from industry growth – particularly in oil production – outpace reductions from regulations already on the books.

The report shows that there are real solutions that can put natural gas on a safer path for communities and for the climate. There were several conclusions, but the following items echo the need for quick action on the part of the Department of the Interior and the Bureau of Land Management.

- The U.S. oil and gas industry can significantly and cost-effectively reduce emissions of methane – the primary ingredient in natural gas and a highly potent greenhouse gas – using currently available technologies and operating practices
- Industry could cut methane emissions by 40% below projected 2018 levels at an average annual cost of less than one cent on average per thousand cubic feet of produced natural gas by adopting available emissions-control technologies and operating practices.
- If the full economic value of recovered natural gas is taken into account, the 40% reduction is achievable while saving the U.S. economy and consumers over \$100 million per year.
- A number of solutions, particularly in the upstream of the oil and gas value chain, will have environmental co-benefits at no extra cost, by reducing emissions that can harm human health, like volatile organic compounds and hazardous air pollutants.

There has already been some great work in New Mexico out of your Carlsbad Field Office utilizing “Notice to Lessees and Operators of Onshore Federal and Indian Oil and Gas Leases (NTL-4a) Royalty or Compensation for Oil and Gas Lost” toward

implementing these measures. Although a full analysis of recent data to determine whether emissions of methane and other volatile compounds have been reduced within the area has not yet been completed, the Carlsbad Field Office has been pro-active, collecting a much more realistic economic value of the recovered natural gas in southeast New Mexico. Venting and flaring equals lost royalties—royalties that could be used to support staffing to implement permitting, compliance, monitoring, and restoration and to ensure the new ruling is being implemented properly.

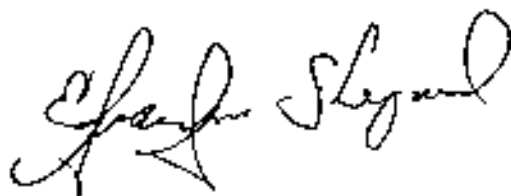
The immediate need for a new rule is critical to address the issues nationwide. Wasted natural gas is a significant public health issue and has determinate effects upon climate. According to the Intergovernmental Panel on Climate Change, pound for pound, methane is more than 80 times more potent than carbon dioxide in the first 20 years after its release and is already responsible for a quarter of man-made warming we are experiencing today. The problem is so acute in the San Juan Basin Region that NASA has spotted a methane cloud the size of Delaware across the entire Basin.

The longer we wait, the more natural gas that is owned by all Americans is wasted, the greater the risk to human health, and the greater effects upon climate change. A strong rule on venting and flaring is a win-win for citizens across the Nation. It is more money for federal, state, and local budgets; it is more jobs for our citizens; it is cleaner air for people to breathe; and it is the opportunity to reduce methane contribution toward climate change up to 40% by the year 2018.

As a group of professional and experienced public land managers, we urge you to move forward swiftly with a draft rule to help the citizens of this great Nation while providing good stewardship of our federal lands and resources.

The Public Lands Foundation (PLF) is a national nonprofit membership organization that advocates and works for the retention of America's National System of Public Lands in public hands, professionally and sustainably managed for responsible use and enjoyment by American citizens. PLF endorses and embraces the multiple use mission of the BLM. Members are predominantly retired employees of the BLM from across the United States and as such have spent their careers dedicated to the sound management of these valuable lands and resources. Many of our members spent their careers managing the public lands located throughout the West. They have personal knowledge of these lands and resources and unparalleled expertise in their management.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward W. Shepard". The signature is fluid and cursive, with a large initial "E" and "S".

Edward W. Shepard, President

Cc: **BLM Director, Neil Kornze**

**Assistant Secretary, Land and Minerals Management, Janice Schneider**

**Assistant Secretary, Policy, Management and Budget, Chris Sarri**