

The Honorable Sally Jewell  
Secretary  
U.S. Department of the Interior  
1849 C St. NW  
Washington, DC 20240

June 3, 2015

Dear Secretary Jewell,

In January, the Administration committed to a suite of actions — including action by the U.S. Department of the Interior’s Bureau of Land Management (BLM) — to reduce harmful and wasteful methane emissions from the oil and gas industry, the nation’s largest industrial source of this pollution. Reducing methane waste ensures that resources extracted from the 700 million acres of public lands are not simply discharged to the atmosphere but, rather, recovered for use by homes, schools, and businesses. Minimizing methane waste will also significantly reduce emissions of smog-forming pollutants and air toxics, protecting communities on and near tribal and federal lands from harmful health effects associated with these pollutants. The Department of the Interior has a real opportunity to dramatically reduce the waste of public resources, enhance royalty collections for taxpayers, protect public health, and make an important contribution to the Administration’s Climate Action Plan and its goal of significantly reducing methane emissions by 2025.

We urge BLM to propose a rigorous methane waste rule this summer that includes strong standards that dramatically reduce methane pollution and waste from both existing and new oil and gas facilities on federal and tribal lands; set a minimum benchmark for action by state and field offices; and cultivate an ethic of innovation whereby BLM, working with industry and other stakeholders, continuously seeks deeper pollution and waste cuts as technologies advance. Such comprehensive and rigorous methane waste standards would leverage BLM’s distinctive planning and management authorities as well as honor its responsibility to manage the federal, publically-owned oil and gas resource in trust for the American people.

Comprehensive and rigorous standards covering, at a minimum, the sources discussed below will deliver important fiscal, public health and environmental benefits. Several states have already adopted regulations that reflect one or more of the measures identified below, providing a strong foundation for rigorous BLM measures.

These critical standards should include:

- **Requiring comprehensive and frequent leak detection and repair.** BLM should require rigorous methane leak detection and repair (LDAR) inspections at least quarterly at all types of oil and natural gas facilities on Federal and Tribal lands. Those inspections should include direct, instrument-based monitoring using proven technologies such as infrared cameras. The standards should require swift repair and incentivize continuous improvement of monitoring technologies. In addition, operators should be required to follow stipulated recordkeeping and reporting requirements for LDAR at facilities.
- **Requiring the use of best practices and technology to reduce waste.** BLM should reform royalty policies to incentivize the capture of methane waste. The agency should also identify the best waste-prevention technologies and practices, including zero-emitting alternatives, for equipment that releases natural gas during normal operation. Such standards should cover, at a minimum, reciprocating and centrifugal compressors, pneumatic controllers and pumps, liquids unloading activities, storage vessels, flares and combustion devices, and well maintenance and completion activities. Operators should be required to use these technologies and/or practices at both new and existing facilities on lands subject to BLM jurisdiction.
- **A broad prohibition on venting of associated gas.** Venting of associated gas from oil wells under BLM jurisdiction can almost always be avoided, and it should be prohibited unless the operator provides a demonstration of necessity for which a variance is granted. Such exceptions should include safety/emergency conditions or technological factors that make capture or combustion infeasible.
- **Measures to ramp down and ultimately phase out wasteful flaring of associated gas.** BLM should dramatically reduce and ultimately phase out routine flaring of associated gas from oil wells. Connection to gathering lines or other beneficial use of associated gas should be required from the start of production for newly developed leases, and flaring at existing leases should be phased out on a reasonable schedule that allows for the development of necessary infrastructure and beneficial-use applications. Resource Management Plan standards, lease stipulations, and conditions of approval should be deployed, and gas capture plans—as part of the application for permit to drill—required, to ensure that these requirements are met. Flaring should be allowed only for narrowly defined safety and emergency conditions, wildcat and delineation wells or, during the ramp-down phase, upon establishment of technical/economic infeasibility of connection and beneficial use.

The BLM rule should also ensure that the agency engages in comprehensive and effective methane waste planning and management. Going forward, the BLM rule should require that field offices account for and prevent methane waste—whether from vented, flared, or fugitive methane losses—through the development and implementation of planning documents such as resource management plans, NEPA reviews, lease stipulations, unitization agreements, and conditions of approval. These procedures should encourage field offices to go above and

beyond the basic requirements described above to secure deeper cuts in methane waste where it is feasible to do so in particular circumstances.

We greatly appreciate your leadership in reducing the waste of Federal and Tribal gas resources, protecting public health, and addressing harmful climate pollution. We urge you to establish protective safeguards addressing wasted gas and the associated pollution from new, modified, and existing oil and gas facilities on Federal and Tribal lands, including the above-described sources. These protections are urgently needed to reduce the waste of Federal and Tribal mineral resources and for the health of our communities and families.

Sincerely,

Dan Grossman  
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Environmental Defense Fund

Conrad Schneider  
Advocacy Director  
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