



July 3, 2025

Via www.reginfo.gov/public/do/PRAMain

Mr. Kyle Moorman
Chief, Division of Regulatory Affairs
U.S. Department of the Interior
Bureau of Land Management
1849 C Street NW, Room 5646
Washington, DC 20240
Email: kmoorman@blm.gov

Attn: Paperwork Reduction Act Comments (OMB Control Number 1004-0221)

Re: Comments on Information Collection Requirements in Proposed Rescission of the Management and Protection of the National Petroleum Reserve in Alaska Regulations

Dear Mr. Moorman:

The American Petroleum Institute (API) respectfully submits the following comments on the Bureau of Land Management's (BLM) proposed revision of the information collection requirements associated with the management and protection of the National Petroleum Reserve-Alaska (NPR-A).¹

API represents all segments of America's oil and natural gas industry, which supports nearly 11 million U.S. jobs and is backed by a growing grassroots movement of millions of Americans. Our approximately 600 members produce, process, and distribute the majority of the nation's energy. Members also participate in API Energy Excellence®, a program that accelerates environmental and safety progress by fostering new technologies and transparent reporting. API was established in 1919 as a standards-setting organization and has developed more than 800 standards to enhance operational and environmental safety, efficiency, and sustainability.

In 2024, BLM published a final rule that significantly revised the regulatory management framework for lands within the NPR-A.² As part of that final rule, BLM revised the process by which the public and interested stakeholders could recommend lands that should be considered

¹ *Recission of the Management and Protection of the National Petroleum Reserve in Alaska Regulations*, 90 Fed. Reg. 23507 (June 3, 2025) ("Proposed Rule").

² *Management and Protection of the National Petroleum Reserve in Alaska Regulations*, 89 Fed. Reg. 38712 (May 7, 2024) ("2024 Final Rule").

for designation as a Special Area, significant resource values that should be considered in Special Areas, and measures that should be considered to assure maximum protection of significant resource values within Special Areas.³ BLM specified that any such recommendations identify and describe: (i) the size and location of the recommended lands; (ii) the significant resource values that are present within or supported by the recommended lands; (iii) measures that may be necessary to assure maximum protection of those values; and (iv) any other pertinent information.⁴ BLM anticipated that it would receive 100 recommendations per year with an estimated average response time of 15 hours each equaling a total of 1,500 estimated burden hours.⁵

In the Proposed Rule, BLM would restore the pre-existing regulatory requirements that had been in place since 1977. With respect to the criteria for requests for additional special areas, BLM specifies that each recommendation contain: (i) a description of the values which make the area special; (ii) the size and location of the area on appropriate USGS quadrangle maps; and (iii) any other pertinent information.⁶

API supports the proposed revisions to the submittal criteria for recommendations for additional special areas. Returning to the pre-existing regulatory requirements provides a more simplified administrative process with the additional benefit of receiving a map of the requested area. In addition, API agrees that it is highly unlikely that BLM would receive 100 annual requests and that revising the estimated number of annual recommendations to 10 more accurately reflects the potential burdens of the information collection.

We agree with BLM that their proposed changes will be substantially less burdensome on stakeholders than the efforts detailed in the 2024 Final Rule and therefore support the 30-day comment period for the Public Record Act aspects of the Proposed Rule.

Thank you for the opportunity to comment on this information collection request. API supports the revisions to the information collection requirements.

Respectfully submitted,



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³ 43 C.F.R. § 2361.30(b)(3).

⁴ *Id.*

⁵ 89 Fed. Reg. at 38755.

⁶ 90 Fed. Reg. at 23512 (proposed 43 C.F.R. § 2361.1(d)).