



DOI: Office of Management and Budget (E.O. 12866 conference call)

May 22nd, 2023

Submitted Electronically to: shunkins@worc.org (to submit to the OMB)

Greetings, my name is Gusty Catherin-Sauer. I am a community organizer with Northern Plains Resource Council, and I grew up in rural areas of Idaho & Montana (near coalstrip). Northern Plains Resource Council is a grassroots conservation and family agriculture organization based in Montana. We work to ensure the long term health of Montana by protecting our air & water, putting agriculture & ranching community interests above oil and gas profits, and empowering communities to guide responsible development.

- Given my role as a community organizer for Northern Plains I'd like to just share a bit more context for why this rule matters to our members; Northern Plains was formed in 1972 over the issue of coal strip mining and its impacts on ranchers and private surface owners. Our work expanded to include oil and gas development in the late 1990s, when large-scale coal bed methane development was proposed for Montana. Many of our members own farms and ranches in coal bed methane country and in oil and gas-producing areas more broadly. As you heard from Kirk Panasuk and Terry Punt, our members' livelihoods depend heavily on clean air and water, healthy soils and native vegetation, and intact working landscapes.
- As you know Montana/Dakotas administers more than 5,000 Federal leases in the three-state area. Currently almost 3.5 million acres of mineral estate is leased for the purpose of oil and gas development. Although we are encouraged to see the state of Montana take action by applying and qualifying for the federal grant funding to plug orphaned wells, we know it has been difficult to navigate plugging projects on split estates. We'd like to see more leadership from the Bureau of Land Management in order to support the states in their work, especially considering that those federal grant funds are coming from taxpayer dollars. Inflation, an unstable oil and gas market are just a few of the relevant and urgent justifications for an increase in the base bond amounts through rulemaking. Although we do not know when or where the next oil boom and bust may occur, rulemaking to update our bonding levels should begin now