



June 8, 2023

Delivery via submittal to [regulations.gov](https://www.regulations.gov)

Ms. Nada Wolff Culver
Deputy Director of Policy and Programs
Bureau of Land Management
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

RE: Request for Extension of Comment Period for Proposed Rules for the Bureau of Land Management Conservation and Landscape Health; Proposed Rule, 88 Fed. Reg. 19,583 (Apr. 2, 2023)

Dear Deputy Director Culver:

The American Exploration and Production Council (AXPC) respectfully requests an extension of the comment period for the proposed rule for the Bureau of Land Management Conservation and Landscape Health; Proposed Rule, 88 Fed. Reg. 19,583. The comment period was opened by publication of the proposed rule in the Federal Register on April 2, 2023, and currently has a deadline of June 20, 2023. We believe an extension of time is warranted based on the significance of the proposed rule, which in our view represents a fundamental shift in the way BLM currently manages federal lands under the Federal Land Policy and Management Act's (FLPMA) multiple use mandate.

AXPC is a national trade association representing 34 leading independent oil and natural gas exploration and production companies in the United States, including many who operate on BLM managed federal lands. Dedicated to safety, stewardship, and technological advancement, our members strive to deliver affordable, reliable energy to consumers while positively impacting the economy and the communities in which we live and operate. As part of this mission, AXPC members understand the importance of ensuring positive environmental and public-welfare outcomes and responsible stewardship of the nation's natural resources. In the spirit of meaningfully fulfilling both of those goals, we believe an extension to the comment period is warranted to enable AXPC and other interested stakeholders to prepare and submit thorough comments.

This proposed rule is important to our membership who are strong supporters of conservation as well as the importance of the multiple use mandate which BLM administers. However, based on the recent stakeholder meetings that have taken place, it has become apparent that our ability to prepare comment was limited without access to all the supporting documentation, some of which was not seen until BLM's first public meeting on May 15, 2023 and is still not included in the administrative docket on [Regulations.gov](https://www.regulations.gov) for review. While selected information is available on the BLM website, we ask BLM to include all supporting documentation in the docket, including but not limited to the infographics and fact sheets discussed at the public meeting, so that stakeholders can access and evaluate the administrative record. Once provided, we respectfully ask BLM to extend the comment period an additional 45 days to allow the necessary time for the public to review these supplemental materials and comment on the new information they contain. We also recommend that BLM use the extension to conduct additional outreach

in order to obtain the appropriate input from public land stakeholders, in each of the 12 states most likely to be impacted by the proposed policy.

Our members would appreciate sufficient opportunity to carefully analyze the proposed rule as informed by the additional presentation material and stakeholder session discussions so that comments are as informed and constructive as possible. The current comment deadline does not allow for that needed time. Therefore, **we respectfully request that BLM extend the comment deadline by a period of 45 days after all materials have been posted to regulations.gov for the public to access.** This extension would allow both our members and other stakeholders minimally sufficient time to respond to BLM's proposal in a detailed, constructive, and helpful way, as well as help to yield a more informed final product with a lower likelihood of creating negative, unintended consequences.

We appreciate BLM's consideration of this request for an extension of time for comment. Please do not hesitate to contact us with any questions.

Respectfully,

A handwritten signature in cursive script that reads "Wendy Kirchoff".

Wendy Kirchoff

Vice President, Regulatory Affairs

American Exploration and Production Council

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