

March 20, 2024

Dr. Howard Shelanski, Director  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget  
Executive Office of The President  
The White House  
1600 Pennsylvania Ave NW  
Washington, DC 20500

Ref: Fluid Mineral Leases and Leasing Process  
RIN: 1004-AE80  
ID No. BLM\_HQ\_FRN\_MO4500172196

Dear Dr. Shelanski,

I am The Rev. Dr. Jessica Moerman, I serve as the President/CEO of The Evangelical Environmental Network. I am also a climate scientist by training, local church pastor, but most importantly I am a mother of two energetic young boys.

At the Evangelical Environmental Network, we have the vision of a safe climate and pollution-free world for all God's children and creation. The Bureau of Land Management's Fluid Mineral Leases and Leasing Process rule is critical to seeing this vision become a reality. The proposed measures to modernize oil and gas leasing on our public lands is a win for God's creation, better health, fiscal responsibility, and fairness for the American taxpayer.

In Luke 16:10, Jesus teaches that "whoever can be trusted with a little can also be trusted with a lot, and whoever is dishonest with a little is dishonest with a lot."

Each year, through the issuance of oil and gas leases on public lands, the American people put their trust in the oil and gas industry to wisely steward our precious natural resources and give a fair return on investment. However, instead of wise stewardship, we find our trust misplaced with an industry unwilling – though not unable – to clean up its own mess.

Current oil and gas industry practices and standards have resulted in despoiled air and water, the lives and health of communities threatened both near and far, and the expectation that the American taxpayer will foot the bill for both the clean-up and associated health costs. Under the existing status quo, the annual rate for a fossil-fuel company to lease an acre of public land is a mere \$3. With the five largest oil companies reporting combined profits of \$196.3 billion in 2022, the status quo is not only a bad deal but simply unfair.

This long overdue modernization updates onshore royalty rates for the first time in over 100 years and bonding requirements for the first time in 60 years. These common-sense provisions will advance the responsible stewardship of America's lands and our precious natural resources, defend the lives and health of children and other vulnerable Americans by reducing emissions of carbon pollution and harmful toxins into our air and water, while also ensuring the American taxpayer receives a fair return on investment and is no longer held responsible for paying to clean up the messes of the oil and gas industry. The proposed rule also ensures oil and gas companies cover the cost of environmental remediation and that the next generation will not be saddled with despoiled land, water, and air and a billion-dollar price tag for a mess they didn't make.

As part of Infrastructure Investment and Jobs Act passed last year by Congress, the Bureau of Land Management (BLM) is now preparing to distribute \$16 billion of taxpayer money to clean up the gigantic mess industry negligently left behind. And to make matters worse, \$16 billion is only the proverbial drop in the bucket for the restoration work that is needed.

This, however, is a problem that never should have existed. Before starting drilling operations, companies are supposed to post financial bonds to cover the cost required to restore impacted land and water.

The regulatory changes at issue are critical to addressing the flaws in the leasing program and tamping down unbridled land speculation. The rule implements clear directives from Congress under BLM's authority as set forth in the Inflation Reduction Act, the Mineral Leasing Act, and the Federal Land Policy and Management Act. Moreover, reform to the onshore oil and gas program enjoys broad support, including over 33,000 Christians who submitted supportive comments, and is needed to address shortcomings in the program that the Biden Administration, leaders in Congress, and the GAO have all repeatedly identified.

As Christians called in Scripture to be good stewards of God's creation, we also support the provisions protecting wildlife and cultural resources. The rule would help steer oil and gas development away from important wildlife habitat or cultural sites, and instead toward lands with existing infrastructure or high production potential.

Every year, a significant portion of the acres offered for lease go unsold or are leased but not developed. Thousands of approved federal drilling permits issued at taxpayer expense are never used.

For example, between 2012 and 2020, the oil and gas industry leased nearly 5 million acres of public lands that have little to no potential for oil and gas development—that translates to 55% of federal oil and gas leases sold since 2012 being on land with little to no chance of ever producing oil or gas. Moreover, 60% of leases that were sold competitively for the minimum bid since 2012 have been on lands with little to no potential for oil or gas development. To make matters worse, much of this leasing has occurred in places with valuable fish and wildlife habitat.

Leasing on lands with little or no drilling potential puts our public lands at risk, because any leases—even those that aren't developed—make it difficult for BLM to manage public lands for other, more valuable uses, such as conservation and recreation.

Rampant speculation from indiscriminate leasing practices on public lands hurts taxpayers, communities, conservation, resources, and sensitive cultural, fish and wildlife, and recreational resources. The rule's use of preference criteria to determine which acreage should be prioritized for leasing is a commonsense approach that, when robustly and consistently applied and used to inform leasing decisions, will benefit taxpayers and make wise use of public lands.

American taxpayers subsidize fossil fuels more than any other industry in the United States. Our past and current tax system incentivizes profits for fossil fuel companies, while the costs are borne in the hearts, lungs, minds, and even lives of our children.

It is time to advance the well-being of our children instead of the fossil fuel industry. And it is past time for the American taxpayer to stop footing the bill to clean up the fossil fuel industry's messes.

The proposed rule and modernizations are critical to defending our kids' health and future – something that would not be necessary if we had proper bonding, fair fees, and just royalties in place from the start.

Now is the time to exercise sound fiscal responsibility through good economic and biblical stewardship. Our children's health and the American economy cannot afford for us to repeat the mistakes of the past.

We fully support this rulemaking and urge the release of the final rule without delay because it is critically needed to address the many programmatic shortfalls. This rule works hand-in-hand with other rules awaiting finalization, such as the public lands rule, and therefore should be finalized expeditiously to ensure coordination of this vital regulatory agenda.

Sincerely,



Rev. Dr. Jessica Moerman, PhD  
President/CEO  
Evangelical Environmental Network