EEN EVANGELICAL ENVIRONMENTAL NETWORK

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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

Dear Dr. Shelanski:

My name is Lindsay Garcia. I serve as the Director of Communications for the Evangelical Environmental Network and Young Evangelicals for Climate Action, and I live in Denver, Colorado. As a Coloradan and a Christian who cares deeply about stewarding God's creation well, the issue of oil and gas leasing reform is particularly important to me, and I appreciate you taking the time to hear and consider my thoughts and experiences today.

In this beautiful state I call home, we are blessed with 8.3 million acres of public lands. These lands support rich cultural resources, protect endangered species, and offer a variety of recreational activities that draw many people to our state. Unfortunately, in its current form, the onshore oil and gas program effectively elevates oil and gas leasing above other uses, leading to losses for taxpayers and undermining conservation. Presently, 90 percent of federal public lands and minerals in the West under BLM management is open to leasing, even though less than a quarter have moderate to high potential for oil and gas development. What is more, under outdated royalty rates, taxpayers have lost out on billions of dollars in revenue.

In learning about the BLM's proposed updates to leasing, I was shocked to learn that currently, the annual rate for a fossil-fuel company to lease an acre of public land is a meager \$3. Under these woefully dated lease bid and rental rates, land speculators have been able to cheaply obtain and hold public leases even if they have no intent to actually develop them.

Additionally, low federal bonding rates—which have not been updated in more than 60 years—result in operators abandoning oil and gas wells on public land with no responsibility to ensure that the well is adequately plugged or that the well site is fully reclaimed. Instead, it is taxpayers who left to foot the bill for orphaned wells polluting our state's air and water. The current federal bonding requirement for an oil and gas lease on public lands is just \$10,000 per well. In reality, the average cost to fully reclaim and plug that same well is nearly \$80,000. It is clear that for the wellbeing of taxpayers and our public lands, we need updated bonding requirements.

These updates are not only common-sense and fair, but popular too. Polling from Colorado College shows that Colorado voters overwhelmingly support reforms to oil and gas leasing on public lands that would limit harmful impacts to land, wildlife, community health, and our Western economies. Specifically, 93% of respondents were in favor of "requiring oil and gas companies to pay all costs of cleanup and land restoration."

At EEN, we've seen similar favor for reforms among Christians. Last September, over 33,000 pro-life Christians nationwide—including hundreds of Coloradans—wrote to the BLM, calling for updates to leasing as a way of preserving clean and safe public lands for future generations and ensuring a fair deal for taxpayers. These comments highlighted how existing oil and gas industry practices have "resulted in despoiled air and water," threatening the health of communities and families. For pro-life Christians who believe in the sanctity of life and take seriously biblical commands to serve and protect God's creation, updates to oil and gas leasing are a necessity.

America's energy workers play a vital role in keeping the lights on and driving our national economy. But practices of the oil and gas industry have historically come at the expense of our public health and good stewardship of the lands the American people have entrusted to their care. The BLM's proposed updates would bring oil and gas leasing into the 21st century by supporting common-sense reforms that prioritize community health, and all that our public lands have to offer, not just industry profits.

Thank you again for your work on this important matter.

Sincerely,

Lindsay Garcia Director of Communications Evangelical Environmental Network