

United States Senate
Washington, D.C. 20510

February 3, 2023

The Honorable Tracy Stone-Manning
Director
Bureau of Land Management
1849 C Street, N.W.
Washington, D.C. 20240

Dear Director Stone-Manning,

We write to urge the Bureau of Land Management (BLM) to follow the lead of our states by eliminating the wasteful practice of routine venting and flaring from oil and gas operations in your final Waste Prevention Rule. Although we support the expressed intent of BLM's proposed rule to collect royalties from vented and flared gas, the proposal does not go far enough to eliminate waste. Our states understand the urgency of eliminating this waste and its accompanying pollution, and are actively demonstrating that these activities can be prohibited effectively.

Routine flaring is the unnecessary and harmful practice of burning off associated gas as a waste product, instead of putting this valuable commodity to use; venting allows gas to escape directly into the atmosphere without combustion. As BLM has noted, venting and flaring from production on public lands has increased significantly over the last 30 years. Between 1990 and 2000, venting and flaring from federal and Tribal onshore leases averaged approximately 11 billion cubic feet per year in losses. Between 2010 and 2020, total annual losses rose to more than 44 billion cubic feet, enough to serve roughly 675,000 homes.¹ A report from Synapse Energy Economics found that oil and gas companies operating on public and Tribal lands wasted over \$500 million worth of gas in 2019.² This growing waste robs taxpayers, Tribes, and local communities of valuable revenue and undermines America's energy security.

Pollution from routine venting and flaring also hurts public health, the environment, and nearby communities. In 2019, routine flaring and venting from lands subject to BLM standards released about 150 billion cubic feet of methane emissions, a powerful accelerant of climate change.³ Venting and flaring also emits volatile organic compounds, such as benzene (a powerful carcinogen), and nitrogen oxides. These pollutants also promote the formation of harmful, ground-level ozone. These emissions – combined with the light and noise pollution from

¹ Bureau of Land Management (BLM), *Interior Department Takes Action to Reduce Methane Releases on Public and Tribal Lands* (press release, Nov 28th, 2022), <https://www.blm.gov/press-release/interior-department-takes-action-reduce-methane-releases-public-and-tribal-lands>

² Synapse Energy Economics, *Onshore Oil and Natural Gas Operations on Federal and Tribal Lands in the United States: Analysis of Emissions and Lost Revenue*, January 23, 2023. (https://blogs.edf.org/energyexchange/files/2023/01/EMBARGOED_EDF-TCS_Public_Lands_Analysis.pdf)

³ White House Office of Domestic Climate Policy, U.S. Methane Emissions Reduction Action Plan (Nov. 2021), available at <https://www.whitehouse.gov/wp-content/uploads/2021/11/US-Methane-Emissions-Reduction-Action-Plan-1.pdf>.

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continuous flaring operations – inflict particular harm on nearby communities, many of which already suffer disproportionately from pollution exposure.

Our states have long recognized the harm of routine venting and flaring and moved to prohibit it. Colorado adopted regulations in 2020 that ended almost all venting and flaring in our state.⁴ New Mexico adopted similar requirements in 2021.⁵ In addition, many major oil and gas producers have voluntarily agreed to avoid routine flaring from new wells and end it for existing operations by 2030.⁶

We urge BLM to follow our states’ example and prohibit all routine venting and flaring at new wells and swiftly phase it out at existing wells on public and Tribal lands. The oil and gas resources on these lands belong to the American public and Tribal nations, respectively, and they deserve to benefit from cleaner air and the full value of their resources. We appreciate your attention to this matter.

Sincerely,



Michael F. Bennet
U.S. Senator



Martin Heinrich
U.S. Senator



John Hickenlooper
U.S. Senator



Ben Ray Luján
U.S. Senator

⁴ Code of Colorado Regulations, Oil and Gas Conservation Commission, 2 CCR 404-1 § 903 (accessible at <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=9245>).

⁵ New Mexico Administrative Code, Venting and Flaring of Natural Gas, § 19.15.27.8(A) (accessible at <https://www.emnrd.nm.gov/ocd/wp-content/uploads/sites/6/Part27-FinalRule3.25.21a.pdf>).

⁶ World Bank, *Zero Routine Flaring by 2030 Initiative Text* (<https://www.worldbank.org/en/programs/zero-routine-flaring-by-2030/initiative-text>).