



April 11, 2018

U.S. Department of the Interior  
Director (630), Bureau of Land Management  
Mail Stop 2134LM  
Attention: 1004-AE53  
1849 C St., N.W.  
Washington, D.C. 20240

**RE: Bureau of Land Management Rulemaking: Waste Prevention, Production Subject to Royalties, and Resource Conservation; Rescission or Revision of Certain Requirements**

BLM Planners:

Public Land Solutions welcomes this opportunity to comment to the Bureau of Land Management's (BLM) proposal to revise the 2016 Waste Prevention, Production Subject to Royalties, and Resource Conservation (2016 Methane Rule) "in a manner that reduces unnecessary compliance burdens, is consistent with the BLM's existing statutory authorities, and reestablishes long-standing requirements that the 2016 final rule replaced." As advocates for the outdoor recreation industry, PLS approaches this issue from both the business and the environmental perspective, and we urge you to retain the initial 2016 Methane Rule and thereby retain the common sense rules that limit the wasteful venting and flaring of methane from oil and gas operations on public lands and protect air quality that is critical for the enjoyment of public lands.

Public Land Solutions (PLS) has a long record of working on BLM public land issues and planning initiatives across the West, including Resource Management Plans, various local activity plans, Master Leasing Plans, and several initiatives related to recreation planning and energy development. We focus on how these initiatives affect local businesses that rely on public lands and support balanced management solutions that encourage appropriate multiple uses including protecting and enhancing recreation assets.

Last year, hundreds of thousands of stakeholders expressed their overwhelming support for pollution standards to reduce methane waste and keep our air clean via the 2016 Methane Rule. Moreover, the U.S. Senate voted to save the 2016 rule when it rejected a 2017 effort to overturn the rule through the Congressional Review Act. This new proposal would severely weaken efforts to curb waste on public lands leading to the loss of hundreds of millions of dollars of taxpayer-owned energy every year, and threaten air quality, recreation-based economies, and the quality of life of dozens of communities across the West.

The \$887 billion outdoor industry brings jobs to communities across the country in many ways. Recreation visitors bring needed dollars to cities and towns that have recreation assets like rivers, trails, and other outdoor spaces where fishing, hunting, boating, hiking, biking, climbing and a long list of other outdoor activities take place. Outdoor recreation companies, both large and small, are choosing to locate in these communities because our employees want to live in places with access to the great outdoors. Across the country, communities that have previously depended primarily upon resource extraction have begun to diversify their economies into the recreation sector, and it is regulations like the 2016 Methane Rule that make this possible. By implementing best practices and using newly developed technologies we can:

- Improve air quality in oil fields across the country
- Create jobs that can never be exported overseas
- Bring needed royalty revenue to county budgets
- Support the growing recreation industry in the communities that need it the most

Across the country we are seeing that healthy public lands lead to healthy economies. Many companies in the oil and gas industry support the 2016 Methane Rule, and have developed improved ways to trap fugitive gas emissions during both drilling and the life of the well pad. We understand the need for energy production, but it is time to acknowledge both the costs and benefits to local communities. Allowing oil and gas operators to use old technology will damage air quality and prohibit communities from diversifying their economies. A win-win solution is available by requiring operators to use best practices to protect air quality and the outdoor recreation economy.

Public Land Solutions urges you to maintain and uphold the original 2016 BLM Methane and Waste Prevention Rule. We look forward to working with the BLM through all phases of this rulemaking process. Please feel free to contact me with any questions or comments at [jason@publiclandsolutions.org](mailto:jason@publiclandsolutions.org).

Best regards,



Jason Keith  
Managing Director  
Public Land Solutions