



April 4, 2017

The Honorable Ryan Zinke
Secretary
Department of Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Zinke,

On behalf of the Independent Petroleum Association of America (IPAA) and our 9,000 members who develop over 90 percent of the nation's oil and natural gas wells, I write to express our appreciation for President Trump's Executive Order (EO) on Promoting Energy Independence and Economic Growth. We support the President's efforts to roll back many of the overbearing and unnecessary federal regulations that were promulgated during the Obama Administration. This excessive federal regulatory structure poses a serious impediment to our industry and many others.

IPAA has been working diligently with members of Congress to support use of the Congressional Review Act (CRA) to overturn the Bureau of Land Management's (BLM) regulation entitled Waste Prevention, Production Subject to Royalties, and Resource Conservation Rule, which is commonly referred to as the venting and flaring rule. While our preferred method is repeal through the CRA as it would quickly overturn the overreaching regulation, we are pleased to see the Presidential EO includes language to rescind the order. IPAA supports any and all efforts to overturn this harmful regulation that was finalized in the eleventh hour of the Obama Administration.

Since the venting and flaring regulation became final on January 17, 2017, our member companies have already begun to grapple with the complexities of implementing the new regulation. With looming deadlines to order and install expensive equipment for well compliance, swift action from the Administration is needed to provide certainty on how these companies should proceed with respect to the final rule and operating on federal lands. We are requesting the Department of the Interior to publish a notice in the Federal Register to suspend the rule immediately as unwinding the regulation currently in place will take time and resources from your agency.

IPAA joined Western Energy Alliance to file a legal challenge when the final rule was published. Unfortunately, the judge found that the high bar to attain a legal stay for the rule as it is being litigated was not met. This could mean months of legal battle before the court makes their decision on our case. Meanwhile, the final rule remains in place and our companies are legally bound to comply. A suspension of the rule published in the Federal Register will give our companies clarity and will also send a strong message to the courts about the change in the Administration's position.

IPAA always stands ready to engage in any effort that will help us meet our mutual goal of safe and responsible oil and natural gas development. We look forward to working with you and your agency in the coming weeks to resolve this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel T. Naatz". The signature is fluid and cursive, with the first name "Daniel" being the most prominent.

Daniel T. Naatz
Senior Vice President, Government Relations and Political Affairs
Independent Petroleum Association of America