



The Honorable Bruce Westerman  
Chairman, Committee on Natural Resources  
1324 Longworth House Office Building  
Washington, D.C. 20515

June 15, 2023

Dear Chairman Westerman,

The Independent Petroleum Association of America (IPAA) writes in support of H.R. 3397 (Rep. Curtis), a bill to require the Director of the Bureau of Land Management (BLM) to withdraw a rule of the BLM relating to conservation and landscape health. IPAA is a national upstream trade association representing thousands of independent oil and natural gas producers and service companies across the United States. Independent producers develop 91 percent of the nation's oil and natural gas wells. These companies account for 83 percent of America's oil production, 90 percent of its natural gas and natural gas liquids (NGL) production, and support over 4.5 million American jobs.

IPAA is pleased to support H.R. 3397 as it aims to withdraw the misguided rule that is currently being proposed by BLM. IPAA believes the proposed rule is a gross overreach of BLM's directive and violates the statutory authority given to BLM under the Federal Lands Policy and Management Act of 1976 as well as misaligning with the Congressional intent in creating and delegating powers to the BLM. H.R. 3397 goes far in reiterating the intent of Congress to clear any ambiguity for further regulations.

Aside for Congressional intent and agency overreach, the content of the proposed rule will have devastating impacts on the U.S. economy and hinder U.S. energy security by curtailing energy production on federal lands. In 2019, the United States produced record levels of crude oil (12.2 million barrels per day) and natural gas (40.7 trillion cubic feet)—increases of 11.3% and 10.6% from 2018 levels, respectively. The United States, as a result, enjoyed its best energy security since 1970 and became a net energy exporter for the first time since 1952. Oil production in federal areas, both onshore and offshore, routinely exceeds 20% of total U.S. production. For gas, federal onshore production constitutes approximately 10% or more of total U.S. production, or between 3 and 4 trillion cubic feet.

Furthermore, FLPMA mandates the productive use of federal land. FLPMA directs the agency to manage *all public lands* "in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber *from the public lands...*" This policy determination was not delegated to the Agency. Instead, Congress delegated the responsibility to manage the public lands in a way that provides these specific raw materials for productive use. The current proposed rule is elevating a non-use function to have equal footing with all other active uses.

IPAA commends the Natural Resources Committee for bringing these issues to light during the legislative hearing for H.R. 3397. We look forward to partnering with you on other multiple-use initiatives for our nation's public lands.

Respectfully,

**Daniel T. Naatz**  
Executive Vice President & Chief Operating Officer  
Independent Petroleum Association of America (IPAA)