



June 13, 2025

The Honorable Doug Burgum
Secretary
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Burgum:

The Independent Petroleum Association of America (IPAA) appreciates your continued efforts to streamline federal regulations and reduce unnecessary red tape. We also appreciate your commitment to energy leadership and security, and we look forward to continuing to address issues important for sustained oil and natural gas production in the United States. IPAA members are the primary producers of the nation's oil and natural gas, accounting for 83 percent of America's oil production and 90 percent of its natural gas output. Independent producers remain a driving force in our economy and support millions of jobs in the United States.

Although there are a variety of important issues facing independent producers on offshore and onshore federal lands, IPAA wants to raise three specific issues the Trump Administration is working on that are of vital importance to our members. These issues are outlined below:

1. Revising the Risk Management and Financial Assurance Rule for OCS Lease and Grant Obligations

We commend the Department of the Interior for announcing plans to revise the Biden Administration's 2024 Risk Management and Financial Assurance Rule for offshore oil and natural gas operations. IPAA strongly opposed the rule when it was announced and believes the Bureau of Ocean Energy Management (BOEM) failed to address the devastating financial impacts the Rule would have on independent offshore energy producers. The Rule aimed to solve a problem that does not exist and alter the bedrock joint and several liability framework, which holds both predecessors and current lessees accountable for decommissioning obligations. The longstanding joint and several liability system has been extremely successful and shielded taxpayers from decommissioning costs through the years.

The Gulf of America (GOA) provides critical oil and natural gas production which benefits the U.S. Treasury and national security interests. The Biden Financial Assurance Rule would have a devastating impact on independent oil and natural gas producers operating in the GOA. It would reduce competition in the offshore oil and gas industry by driving out smaller producers and lead to more uncertainty for companies looking to explore and produce in the GOA. The Rule would destroy high-paying jobs and decrease the country's energy and national security.

IPAA commends DOI for its plans to revise the Risk Management and Financial Assurance Rule and urges it to quickly adopt a rule like the approach taken in the 2020 Proposed Rule regarding this important issue.

2. Rescission of the Conservation and Landscape Health Rule

We also commend the Department of the Interior for rescinding the Conservation and Landscape Health Rule implemented by the Biden Administration. The BLM's Rule is both misguided policy and legally problematic. It turns the long-standing policy of "multiple use" of federal lands on its head and treats conservation as a beneficial use under the Federal Land Policy and Management Act (FLPMA). This Rule is another step toward non-use of public lands and would have devastating impacts for towns and communities throughout the Intermountain West.

The Conservation and Landscape Health Rule would harm the U.S. economy and energy security and would hinder independent oil and gas producers from operating on federal lands. The Rule violates BLM's statutory authorities under FLPMA and is an unworkable scheme that would be extremely hard for the agency to consistently apply.

IPAA and our members are committed to working with DOI's land management professionals to develop America's oil and natural gas resources on BLM multiple use lands in a manner that preserves and protects the environment. Conservation and wise management of our nation's natural resources is extremely important and something that the American public should expect. However, the Conservation and Landscape Health Rule does nothing to further that goal and we urge the Trump Administration to take action to terminate the Rule as soon as possible.

3. Permitting Reform

Oil and natural gas production on federal lands and waters provides huge economic benefits to the United States in terms of jobs, royalties, and economic benefits to state and local communities. The Biden Administration used the federal permitting process as a tool to hamper production in these areas and took

every action to create greater hardship for America's oil and natural gas producers.

Permitting reform is critical to bolster America's energy security and build energy infrastructure to support our nation's projected energy demands in the coming years. Permitting reform goes far beyond the oil and gas patch and is needed across the spectrum to allow America to unleash our energy potential. We encourage the Trump Administration to continue its efforts to review, modify and repeal regulations that are choking much needed energy projects on federal lands.

The choices our nation makes regarding energy policy will have an enormous impact on America's economy and our position in the world. IPAA thanks the Trump Administration for taking positive action to support America's small oil and natural gas producers. The continued growth of America's oil and natural gas renaissance is essential and can be done with even greater efficiency and technological acumen. The Department of the Interior is taking much needed actions to increase access to our nation's federal lands and waters, and IPAA stands ready to help ensure America has a strong and vibrant energy economy for years to come.

Thank you,

A handwritten signature in black ink, appearing to read "C. Jeff Eshelman", written over a horizontal line.

Jeff Eshelman
President and CEO
Independent Petroleum Association of America