August 24, 2026

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

The Honorable Steve Pearce
Director
Bureau of Land Management
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Re: Proposed Oil and Gas Rule

Dear Secretary Burgum and Director Pearce,

We write today on behalf of our millions of members in opposition to the Department of the Interior's (DOI) proposed rule regarding oil and gas leasing. We urge the Department to withdraw its proposal and continue moving forward with implementation of the Bureau of Land Management's 2024 Fluid Mineral Leases and Leasing Process Rule (2024 Oil and Gas Rule).

On June 24, 2026, DOI published a proposed rule to revise, and essentially rescind, the 2024 Oil and Gas Rule. That rule made long overdue updates to eliminate waste and inefficiency in the federal onshore oil and gas leasing program, held oil and gas companies financially accountable for cleaning up the mess they make on public lands, limited bad actors from participating in the process, and put guardrails on what lands are available for leasing to protect other values, like local hiking trails, big game habitat, and Native American sacred sites.

This new proposed rule, however, would lead to unchecked extraction on our public lands at the expense of taxpayers, ecosystems, wildlife, and public health. The revised proposal would eliminate meaningful public participation in oil and gas lease sales on public lands and roll back bonding requirements that hold oil and gas companies responsible for covering their own clean-up costs for drilling on public lands. The proposed rule even goes as far to do away with a long-standing requirement that split-estate land owners receive notification before their lands are offered for leasing. None of these changes are at all consistent with BLM's duties under the Federal Land Policy and Management Act and other laws to manage public lands for multiple uses, including to benefit fish and wildlife, recreation, and cultural resources, and to support the long-term needs of future generations.

Silencing Public Engagement

The proposed rule substantially limits the public's ability to participate in the federal onshore leasing process. It eliminates the 30-day scoping comment period and 30-day comment period on the draft NEPA document; shortens the time for notices of lease sales from 60 days prior to the sale to 45 days; and reduces the protest period from 30 days to 10 days. The rule also proposes that the Bureau of Land Management (BLM) would charge an additional processing fee of $1 per page for any protests over 50 pages, including attachments and exhibits – therefore charging the public for their one remaining opportunity to comment on lease sales. While public engagement becomes a pay-to-play system, the rule proposes reducing the filing fee that oil and gas companies must pay for competitive and noncompetitive leases from $3,100 to $155.

Imposing protest fees and limiting opportunities for meaningful public engagement while simultaneously lowering and eliminating fees for oil and gas companies further tilts the system in favor of the industry over the public. Communities should have ample opportunity to provide input on how they want their public lands to be used. BLM must offer meaningful public engagement opportunities in lease sales. Instead, this rule aims to cut the public out of the process.

Restoring Outdated Bonding Rates

The rule reverts to pre-2024 bonding minimums that were set over a half century ago and were never indexed to account for inflation or to reflect the actual cost of reclamation, which can average $145,000 per well in high-scenarios. Specifically, it reverts the statewide bonding rate – the collateral a company must front to cover the cost of reclaiming all wells in a given state – from $500,000 to $25,000. It also reverts to $10,000 for individual lease bonds, down from $150,000 under the 2024 Oil and Gas Rule.

Previous bond amounts failed to disincentivize or prevent companies from orphaning or abandoning wells when they go bankrupt or when a well becomes unprofitable. As of 2024, there were an estimated 15,000 orphaned wells on federal lands and at least 10,000 more that are idled and potentially orphaned. These numbers are likely to increase in the coming years and decades as the mandatory leasing provisions of the One Big Beautiful Bill Act are implemented, especially if other guardrails – like minimum bond rates – are weakened or eliminated.

Congress has already allocated $4.7 billion taxpayer dollars to clean up orphaned wells abandoned by oil and gas companies across the country. Rolling back federal bonding requirements could leave taxpayers responsible for up to $753.5 billion in cleanup costs on public lands. Reversing these reforms would shortchange the American public, lock up thousands of acres of land that could be put to other uses, invite speculation, and leave taxpayers on the hook to pay the cost of reclaiming orphaned wells and restoring surrounding lands and waters.

Eliminating Leasing Preference Criteria Protections

The revisions of the 2024 Oil and Gas Rule also include elimination of the preference criteria that screen nominated parcels for potential conflicts with cultural resources, sacred sites, wildlife habitat, and recreation. Instead of prioritizing what communities value most about public lands, the proposed rule would encourage speculative leasing on land that disregards community priorities and prized natural resources. Removing this preference criteria threatens balanced land management use and puts lands with high conservation, cultural, wildlife, and recreation value at risk for drilling.

Infringing on Split-Estate Property Rights

There are more than 57 million acres of split-estate land (i.e., the federal government owns mineral resources while the surface estate belongs to private landowners). Since 2009, the federal government has been required to notify private landowners whenever BLM plans to offer the minerals beneath their lands for oil and gas development. Interested parties must also include the private owner's name and address in their expression of interest (EOI). The proposed rule would remove both long-standing requirements, infringing on landowners' ability to have a say in what happens to their private property rights in favor of corporate oil and gas interests.

Altogether, this proposed rule revives a broken system that favors billionaires and industry profits over protecting taxpayers and the many values of public lands that the American public wants BLM to manage for and protect. If finalized, these revisions would gravely misalign BLM's stewardship of our national public lands and minerals with the public's interest in protecting and preserving public lands, waters, and wildlife. As organizations that are committed to protecting our nation's public lands, we oppose this proposed rule.

Sincerely,

Advocates for Snake Preservation
The Alaska Center
Alaska Wilderness League
Alliance of Nurses for Healthy Environments
Animal Defenders International
Center for Biological Diversity
Chesapeake Climate Action Network
Citizens Caring for the Future
Climate Justice Alliance
Coalition to Protect America's National Parks
Conservation Colorado
Conservation Lands Foundation
Conservation Law Foundation
Earthjustice Action
Endangered Habitats League
Endangered Species Coalition
Friends of the Earth - US
Greater Eldorado Together (GET) Indivisible
GreenLatinos
Heart of the Gila
Hip Hop Caucus
Inland Ocean Coalition
Kettle Range Conservation Group
The Last Plastic Straw
Latino Outdoors
League of Conservation Voters
Los Padres ForestWatch
Montana Wildlife Federation
Mountain Mamas
National Parks Conservation Association (NPCA)
Natural Resources Defense Council
Nature's Theater
New Mexico Interfaith Power and Light
New Mexico Wild
New Mexico Wildlife Federation
Northern California Council, Fly Fishers International
Physicians for Social Responsibility
Rocky Mountain Wild
San Luis Valley Ecosystem Council
Sierra Club
Tuleyome
Waterkeeper Alliance
Western Colorado Alliance
Western Leaders Network
Western Organization of Resource Councils
Western Slope Conservation Center
Wild Connections
Wild Montana
WildEarth Guardians
The Wilderness Society
Wyoming Outdoor Council
Wyoming Wilderness Association
Wyoming Wildlife Advocates