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January 25, 2017

The Honorable Rob Bishop
Chairman
U.S. House Committee on Natural Resources
1324 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Bishop:

The National Stripper Well Association (NSWA) strongly supports the use of the Congressional Review Act to overturn the recent Bureau of Land Management's (BLM) Waste Prevention, Production Subject to Royalties, and Resource Conservation Rule, otherwise known as the BLM venting and flaring rule.

NSWA membership is focused on producing and maximizing the conservation of resources from the estimated 771,000 marginal wells in production - about 410,000 oil and 361,000 natural gas wells. Combined, these wells make up almost 17% of the total of all oil and natural gas produced domestically. NSWA members know that not only is there tremendous economic benefits from extending the operations of oil and gas production as long as possible from existing wells, but the environmental impact of these wells is significantly less than the drilling and development of new wells. It makes more economic sense, and causes lesser environmental impacts by extending the life of existing marginal and stripper wells, rather than imposing overreaching federal regulations which would cause, in cost of compliance, these existing wells to be shut-in and abandoned. In addition, NSWA members have a strong conservation ethic built in; our operations are dependent on making the most of the limited resources our wells produce.

This is why this rule by BLM is so unfortunate. In crafting rules addressing the environmental impact of oil and gas production, the BLM has ignored the actions of industry and the importance of the conservation and maximization of resource production from existing infrastructure. Instead, BLM has focused on changing the rules for operators and threatening existing production and operations for what BLM misperceives as gain. In addition, the rule is a clear effort by BLM to expand regulatory authority into the jurisdiction of the states and the EPA.

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As a result, NSWA strongly supports use of the Congressional Review Act to roll back this action by BLM in publishing a rule that will provide little to no environmental benefit, but significant costs to small energy producers. We urge Congress to act swiftly to overturn the BLM venting and flaring rule.

Sincerely,



Darlene Wallace
Chairman National Stripper Well Association