

March 14, 2016

Director Neil Kornze  
U.S. Department of the Interior  
Bureau of Land Management  
Mail Stop 2134 LM  
1849 C St. NW., Washington, DC 20240



**Attention: 1004-AE14: Waste Prevention, Production Subject to Royalties,  
and Resource Conservation**

Dear Director Kornze,

The Waste Prevention, Production Subject to Royalties, and Resource Conservation proposed rule fulfills the Bureau of Land Management's (BLM's) responsibility to prevent waste and ensure a fair return to taxpayers. BLM should move as quickly as possible to finalize this rule. We urge you to reject requests to delay this rule by extending the comment period now scheduled to close on April 8. Sixty days is a sufficient period of time to prepare and submit comments on this proposed rule.

The simplest reason this rule needs to be finalized as soon as possible is that time is money. After years of study and deliberation at the Department of the Interior, we cannot afford to delay any longer. As you know, almost \$400 million worth of natural gas was vented or flared from BLM-leases in 2013. This is double the amount lost in 2009. Oil and gas operators are wasting taxpayer assets by literally releasing them into the air without paying for them, and the longer we wait, the more money we lose. Taxpayer-owned natural resources are an important source of revenue. With a \$19 trillion national debt, taxpayers can't afford to waste our resources – we need every dollar we're owed.

We will be filing separate and more substantive comments by April 8, outlining requested improvements to BLM's proposal to better address methane waste on Federal and Tribal lands. However, we see no reason to unnecessarily delay BLM's finalization of the rule by extending the comment period for weeks or even months as some have publicly requested. We greatly appreciate your leadership in reducing the waste of Federal and Tribal natural gas resources. We urge you to strengthen and finalize these measures without delay.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Ry Alexander', is positioned above the typed name.

Ryan Alexander  
President