

## **Response of Interstate Oil and Gas Compact Commission to HR 5626, “Blowout Prevention Act of 2010”**

The Interstate Oil and Gas Compact Commission (IOGCC) has deep concerns about the speed at which Congress is attempting to legislate oil and gas regulatory processes with its consideration of HR 5626. There are many questions about this legislation that should be answered before it is given further consideration. The IOGCC urges Congress to delay action until more definitive information can be obtained and provided to legislators. There must be thoughtful regulatory processes in place going forward that will serve this country well for the long term; not knee-jerk reactions to the current disaster in the Gulf.

Several groups and Congressional staff members have expressed concerns that this legislation could be interpreted or expanded to onshore wells. Among the concerns are:

- the definition of wells covered by the legislation,
- the prescriptive approach to legislative operating processes and equipment design,
- the additional federal bureaucracy put in place, and
- the unnecessary duplication of regulatory efforts

Since its inception the IOGCC, the oldest and largest state compact in the nation, has been tasked with providing a unified voice for the 38 member states. The Commission’s member states have established effective regulation of the oil and natural gas industry specific to each state through a variety of programs designed to gather and share information, technology and best regulatory methods for the past 75 years.

The states have a proven history without federal oversight. Regulatory requirements and inspections of well sites are important components in each state. Prevention of accidents and environmental protection are the highest priorities in state regulatory programs. States are best prepared and quickest to react to situations that threaten environmental or human health.

The oil and natural gas producing states have never ceded powers and authority to the federal government regarding oil and natural gas regulations. The federal government lacks both justification and expertise in oversight of oil and natural gas production within the individual states.

There is no “one size fits all” solution to regulating oil and natural gas production. Each state faces individual circumstances for regulating production such as climate, geology and topography for regulating production. Highly experienced officials and inspectors provide oversight of these regulations.

The IOGCC member states work together to provide the best regulatory practices available while protecting the environment and this nation’s energy security. The IOGCC intends to provide information to Congress from its member states prior to further consideration of this bill.