



Submitted via email to Interior.RegulatoryInfo@doi.gov

June 20, 2025

The Honorable Doug Burgum

Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

RE: Comments in Response to the Department of the Interior's (DOI) Request for Information on Reducing Regulatory Burdens

Dear Secretary Burgum:

Western Energy Alliance greatly appreciates President Trump's Unleashing American Energy agenda. Thank you for all the positive actions you and the Interior Department have taken to start enacting that agenda. We appreciate the opening of the Reducing Regulatory Burden comment period to gather input from the regulated community and other stakeholders on how to help DOI effectively unleash American energy.

Western Energy Alliance (Alliance) has been at the forefront of public lands and energy issues for over five decades. We have been in the trenches on policies to promote the responsible exploration and production of oil and natural gas on federal lands in the West. Our members are independent producers and associated companies who operate on federal, tribal, and nonfederal lands in the West. As such, we have collectively detailed knowledge and expertise on how to expand oil and natural gas production on federal lands and how best to help you implement President Trump's energy agenda.

Below are several recommended policy and regulatory ideas to help reduce regulatory burdens. We stand ready to provide more details on any issue and to collaborate with you on these and other policy changes. We can help to reverse the misguided policies of the Biden administration and not only get back to regular order when it comes to leasing, National Environmental Policy Act (NEPA) analysis, and permitting on federal lands, but advance projects to increase production substantially.

I. The Landscape and Conservation Health Rule

We appreciate that the review of this rule is already underway. The Alliance is in a multiple-use coalition challenging the rule, and we appreciate that the litigation is in abeyance while the Bureau of Land Management (BLM) reconsiders the rule. We urge BLM to simply rescind the rule rather than trying to revise it, as it is legally tenuous, if not completely anathema to the Federal Land Policy and Management Act (FLPMA). Further, it is substantially similar to the BLM Planning 2.0 that Congress overturned under the Congressional Review Act (CRA) that President Trump signed into law during his first term. As such, this rule should simply be overturned.

II. Fluid Mineral Leases and Leasing Process Rule

We appreciate that the review of this rule is already underway. The Alliance is the lead plaintiff in an industry-trade coalition challenging the rule, primarily because of the exorbitant bonding rates that will price small, independent producers, i.e., our members, out of the market and off public land. We appreciate that the litigation is in abeyance while BLM reconsiders the rule.

We urge BLM to address the fact that the nationwide bond must be replaced with individual statewide bonds by June 22 of this year, already impacting certain companies. The Alliance requests BLM make the following changes to when revising the rule.

A. Bonding Reform

In the short term, BLM needs to reinstate the usage of nationwide bonds.

BLM should revert to the bonding guidance detailed in IM 2019-14 and rescind the overly broad bonding IM 2024-12. BLM should also revise the bonding regulations codified in the 2024 leasing rule to provide more flexibility for operators and ensure that federal bonding requirements are not duplicative and cumulative to state bonding requirements.

As an example, BLM should analyze the State of Wyoming's state level bonding requirements for analogs to increase efficiency and flexibility for federal bonding requirements.

State-level initiatives and financial assurance regulations, combined with national capital market trends, have dramatically tightened the bonding market for the oil and gas industry; increased demand has resulted in scarcity of financial assurance options and dramatically increased costs. These new state regulations are creating unintended consequences. Increased financial assurance requirements are creating more orphaned wells and causing premature well abandonment, resulting in waste, and additional regulatory and administrative burdens on state

agencies. Obtaining adequate financial assurance to satisfy state and federal regulations has become increasingly expensive and difficult, especially for small companies, and for long-producing, lower margin oil and gas assets.

Increased financial assurance requirements have largely focused on inactive, low-producing, and marginal wells. Financial assurance scarcity has disproportionately impacted smaller companies, which generally have a lower credit rating than large operators with a much higher average per-well production. These companies are more likely to purchase and operate low-producing and low-margin assets. These market forces have driven down the value for assets in later phases of production, including active and potential enhanced recovery projects.

Financial assurance pressures increase bankruptcy and/or premature well abandonment, orphaning legacy assets without adequate plugging and reclamation funding. Increased financial assurance requirements are intended to prevent orphaned wells, but the reverse is occurring; such requirements are increasing the number of wells being orphaned.

B. EOI Fee Processing

The Inflation Reduction Act requires companies to pay a \$5 per-acre fee but is silent about when the fee is paid. The existing rule requires the fee to be collected at the time of sale, yet it is not uncommon that the company that nominates the acreage is outbid at the time of sale. This creates a situation of one company paying for something another company receives. When revising the rule, BLM should simply make the EOI fee payable at the time of sale so that the winning bidder pays for the lease right received, not the losing bidder who goes home empty-handed. It is inherently inequitable to compel one party to pay for property that another party receives.

In the case that there is no bidder, the nominating company then becomes responsible for paying the EOI fee. Whether sold or not, the EOI fee is paid and BLM pockets the fee to cover its lease processing costs. Collecting at the time of sale also prevents the situation of BLM collecting the fee for acreage it never brings to auction. It is also inherently inequitable for the government to take money for a service it does not render, as it is not uncommon for BLM to defer nominations endlessly and never offer them for lease. Since the fee is meant to cover processing costs and there are no costs if the leases are never processed and offered, collecting at the time of sale solves both situations.

C. New and Increased Fees

Further regulatory burdens in the existing rule include increased fees over and above what Congress passed in IRA. The Alliance questions BLM's authority to adjust many of the new fees and fee increases in the rule.

The fees include: fixed fees for designation of successor operator, unit agreement applications, subsurface storage agreement applications, unit agreement expansion applications, and formal lease nominations; and fee increases for name changes, corporate mergers, transfers to heirs and devisees (to include dissolutions and sheriff's deeds), competitive lease applications, leasing under rights-of-ways, class I lease reinstatements, and geophysical exploration permits, including automatic inflation provisions.

However, BLM cannot make automatic inflation adjustments without statutory authority to do so. Nowhere within the FLPMA reasonableness factors is there an ability to adjust for inflation. If BLM wants to proscribe fixed fees and wants the opportunity to increase the fees at a later date, it will need to undergo another FLPMA reasonableness factor test to do so.

III. Returning to Regular Order on Leasing

The Alliance has been in the forefront of defending the entire federal onshore leasing system since the first Trump administration. We have partnered with BLM in defending nearly every single lease sold since 2015 from litigation by obstructionist environmental groups that are opposed to any oil and natural gas development anywhere. As such, we have extensive expertise in the federal leasing process and ways to fix many of the problems and return to regular order on quarterly lease sales.

A. Roadmap for Moving Forward with Development on Nearly 7,000 Existing Leases

The Alliance is involved in numerous cases in the Idaho, Montana, and D.C. District Courts, several that have been subject to a Ninth Circuit Court ruling. Below is an overview of actions DOI can take to clear up approximately 6,978 leases worth about \$2.8 billion and allow projects to move forward. Note that the number of leases provided are not exact because many leases are subject to various, overlapping court rulings and must clear multiple hurdles.

1. Greenhouse Gas (GHG) Analysis

The Interior Secretary has already taken the first step by rescinding the last-minute Biden administration Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS), DOI-BLM-HQ-3100-2023-0001-EA, for 74 oil and natural gas leasing decisions in seven states from February 2015 to December 2020. The Supplemental Greenhouse Gas Environmental Analysis (EA) for which the public comment period was completed in *December 2022*, was thorough and covered various D.C. District Court rulings required additional GHG analysis.

The Biden administration purposefully sat on the EA for over two years before issuing just days before President Trump's inauguration the ill-advised and unnecessary NOI to prepare an EIS. The NOI did not identify any significant new information that would alter BLM's original leasing decisions or otherwise trigger the need for BLM to prepare an EIS under NEPA.

By expeditiously publishing the final Supplemental GHG EA, BLM would enable projects to move forward on about 2,000 leases in the seven states, particularly in Wyoming. About 1,600 other leases in similar litigation must clear additional hurdles, as outlined below.

2. Leases Requiring Additional Public Comment

The second most impactful action DOI could take would be to conduct supplemental NEPA analysis of the June (Nevada and Utah) and September (Nevada, Utah, Wyoming) 2018 lease sales. These leases were involved in the first phase of litigation before the District Court of Idaho. The Ninth Circuit ruled that these 928 leases worth over \$60 million simply require BLM to provide an additional period for notice and public comments.

The supplemental EA should include the additional GHG analysis specified in the Supplemental GHG EA (above) and discuss Greater Sage-Grouse (GrSG) prioritization consistent with the Ninth Circuit's decision in *MWF v. Haaland*. This involves prioritizing parcels for GrSG either by including additional non-GrSG parcels, or deferring parcels from the sale in high-priority habitat areas consistently.

Our member companies are ready to move forward with development on these leases, mainly in Wyoming. This corrective EA should be able to be completed in fewer than six months, according to the congressional mandate in the Inflation Reduction Act (IRA) or could even be a focus for expediting the NEPA process that the Interior Secretary has ordered.

3. Leases Requiring Additional NEPA on Four Distinct Issues

The third way to release backlogged leases is to likewise develop a corrective EA for the “Idaho Phase 2” leases from the February, June, and September 2017 Wyoming lease sales that netted over \$170 million in revenue from 605 leases. There are four distinct issues related to GHG analysis and GrSG that need to be addressed. Prompt issuance of supplemental NEPA will allow permitting and further activities on these leases immediately.

B. Issue the December 2020 Wyoming Leases

In the face of the onslaught of litigation, BLM never issued leases sold from the December 2020 Wyoming lease sale, in anticipation that they would be litigated for the same reasons as multiple other sales. No court order prevents lease issuance, but they still have not been issued. Once the Supplemental GHG EA is published, BLM should simply issue these leases. As they were offered and sold before IRA was passed, they should be issued under the terms in effect in December of 2020.

C. Backlog of Nominations

Over the last three years, BLM has been applying an overly narrow timeframe from which to select Expressions of Interest (EOI) for each lease sale, only considering acres submitted within individual three-month increments and offering acreage seemingly at random during future lease sales. Yet BLM has been ignoring millions of acres of nominations. Going forward, BLM should use the backlog of EOIs back six years, akin to a normal statute of limitations period. While IRA imposed a \$5 per acre EOI fee for future nominations, there is nothing in the law that prevents using EOIs submitted before IRA went into effect. Doing so would reduce regulatory and punitive monetary barriers to leasing and moving projects forward.

D. Reducing the Time from Nomination to Sale

We applaud BLM’s recent Instructional Memorandum (IM) 2025-028 to shorten the time from nomination to sale to six months. While we caution that, with the Idaho District Court ruling on public comment for lease sales (item 2 above), BLM must be careful that all proper steps and a full 30-day public notice and comment period are followed. However, a six-month period from nomination to sale is very feasible and defensible.

E. Approval of Communitization Agreements and Unit Agreements – Payment of Royalties

The Royalty Resiliency Act (RRA or Act) requires the Secretary, or BLM under delegation of the Secretary, to issue all determinations of allocations of production for units and communitization agreements (CA) within 120 days of a lessee’s request for determination. Enacted by Congress on September 20, 2024, to relieve delays in allocation determinations, the Act amends the Federal Oil and Gas Royalty Management Act of 1982 and the Federal Oil and Gas Royalty Simplification and Fairness Act of 1996 to streamline the CA approval process.

Until the BLM issues an official determination, the lessee is authorized to report and pay monthly royalties on oil and gas production in accordance with the terms of the proposed allocation of production as submitted via the CA. Once the BLM issues a final allocation determination, the lessee is allowed three months to “true up” or correct production reports and the amount of royalties paid, if necessary, on the production during the period under which the CA was under review. During that “true up” period, the BLM will waive all interest obligations otherwise incurred while the lessee awaited an official allocation determination.

BLM should review IM 2025-012 (Royalty Resiliency Act Implementation) to see if the process detailed aligns entirely with the Royalty Resiliency Act and whether it can be further streamlined and improved, particularly given the ongoing problems with the BLM AFMSS system.

IV. Permitting

The Alliance appreciates President Trump’s strong commitment to development of oil and natural gas on federal lands and waters. Below are suggestions for removing regulatory burdens that create uncertainty in the permitting process, increase costs, and impede responsible development.

A. Personnel Issues

We are concerned that the recent staff reductions and retirements are affecting the ability of field offices to timely approve permits, rights-of-way, and sundries and to conduct environmental analysis under NEPA. While we agree with the Interior Secretary that the government can be more efficient, BLM is chronically short staffed, especially when it comes to the Petroleum Engineers and Natural Resource Specialists necessary for oil and natural gas permitting and inspections.

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We encourage BLM to take advantage of remote processing, particularly for NEPA documents and Applications for Permit to Drill (APD). Certain busy field offices, such as Carlsbad, could be augmented by personnel in other field, district, state, or headquarters offices.

B. Modernizing Commingling Regulations

BLM should issue an Instruction Memorandum directing Field Offices to approve commingling applications for the commingling of diverse mineral ownership under BLM's existing regulations 43 C.F.R. § 3174.14(b)(5), so long as the applicant can document that there will be a reduction in surface disturbance, capital investment savings or other benefits (e.g., reduced air emissions) that are in the public interest.

BLM should follow this IM with a formal rulemaking to modernize BLM's commingling regulations to reflect current technology advancements in measurement and allocation, and current development practices that emphasize centralized facilities and long horizontal wells.

Allowing the commingling of diverse mineral ownership has multiple benefits. By enabling the consolidation of facilities, surface disturbance is minimized. With fewer equipment components, air emissions are reduced. Consolidated water facilities reduce water use and increase recycling. By reducing the costs from building redundant facilities, often in the multi-millions of dollars, more capital is available for more development and achieves the president's goal of increased production from federal lands.

Whether or not the commingling provisions of the reconciliation bill passed by the House of Representatives become law, BLM has the ability within current regulations to approve commingling applications. Alliance members have had commingling applications approved, which can serve as models for future approvals.

BLM should conduct rulemaking to allow efficient commingling of minerals with varied ownership and royalty rates. BLM's current regulations disfavor commingling when federal interest and royalty rates in commingled leases differ. While BLM's current regulations allow a "public interest" exception to authorize commingling, it is not utilized, primarily due to BLM's outdated concerns regarding metering and measurement accuracy for purposes of royalty calculations.

With major advances in metering and measurement technologies, companies are now able to obtain measurements at or near individual wells with an accuracy level on par with BLM

requirements. This reform would enable consolidation of facilities, leading to more efficient development and reduced air emissions and surface disturbance.

C. Expedited Permitting

We encourage BLM to use Section 390 of the Energy Policy Act of 2005 Categorical Exclusions as much as possible. Some field offices choose to conduct a redundant round of NEPA and not to use the CXs, even when a well would meet the Sec. 390 criteria, in an abundance of caution. CXs are even more efficient than the 14-day NEPA envisioned in the [emergency permitting procedures](#).

BLM should issue an Instruction Memorandum reiterating the legal viability of these statutory categorical exclusions and prioritizing usage, particularly in well developed areas.

D. Fee-Fee-Fed Applications for Permit to Drill

BLM field offices inconsistently apply oil and gas development permitting procedures, including statutorily required analysis and agency policy guidance, for federal permits that are for development and production of federal minerals from a fee surface location that perforates fee minerals before federal minerals (identified by BLM as a “fee-fee-fed” scenario).

No BLM guidance or regulations adequately delineate the boundaries and inherent limits of BLM legal and jurisdictional authority with respect to private property, especially with respect to statutorily required obligations during the permitting process. This absence of regulatory guidance causes field offices to inconsistently impose permitting procedures, resulting in regulatory uncertainty and increased permit processing time and project costs.

Specifically, overly broad designations of federal undertakings encourage BLM to expand the scope of analyses and conditions of approval developed under the NHPA, Endangered Species Act (ESA) and National Environmental Policy Act (NEPA). BLM needs explicit regulations that limit the scope of private surface access for purposes of analyses under the NHPA, ESA and NEPA on privately owned surface to ensure efficient permit processing and business certainty for federal lessees.

First, BLM should initiate a rulemaking to codify the scope of access to privately-owned surface and to BLM’s “fee-fee-fed” policy set forth in a June 12, 2018 Permanent Instruction Memorandum (IM) 2018-014, titled “Directional Drilling into Federal Mineral Estate from Well Pads on Non-Federal Locations,” to establish the limits of federal jurisdiction on privately owned surface related to the environmental analysis and oil and gas permitting of federal minerals.

Creating appropriate boundaries to federal undertakings ensures that BLM will not exceed its authority and conduct superfluous analysis that unjustifiably delays permit processing, increase costs, and subjects' operators to unnecessary mitigation requirements.

Under this proposal, consistent with federal case law and IM 2018-014, the environmental analysis of federal undertakings would be restricted on privately owned surface. BLM does not have jurisdiction on private surface and cannot impose obligations on private surface owners. This regulation would also place limits on the analysis of connected actions, cumulative impacts, and indirect effects.

Limiting analysis to the specific federal action at issue reduces the permitting time, focuses mitigation requirements, and prevents disputes with property owners.

Second, BLM should develop new regulations that specify that access to privately owned surface is not required to fulfill ESA, NHPA and NEPA obligations. This rulemaking should also codify the scope of federal jurisdiction consistent with judicial precedent and existing BLM policy guidance.

E. Permit Reform

BLM should establish a streamlined permit system, such as an administrative categorical exclusion, that upon receiving necessary State approvals, allows operators to move forward with the drilling of oil and gas wells in certain circumstances for which:

- 1) the applicant has filed a complete Application for Permit to Drill (APD) that contains:
 - a. a completed Form 3160-3 (Application for Permit to Drill or Reenter) (see 43 CFR § 3162.3-1(d));
 - b. a well plat certified by a registered surveyor with a surveyor's original stamp (see § 3171.6(b));
 - c. a drilling plan (see 43 CFR §§ 3162.3-1(d) and 3171.7);
 - d. a Surface Use Plan of Operations (see 43 CFR §§ 3162.3-1(d) and 3171.8);
 - e. evidence of bond coverage (see 43 CFR §§ 3162.3-1(d) and 3171.9); and
 - f. operator certification with original signature (see § 3171.10).
- 2) the applicant has an approved corresponding state APD, or six months have elapsed since the applicant submitted a state APD application
- 3) the applicant has paid the applicable permit fee

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- 4) the Secretary has not notified the applicant that there is any deficiency, according to the 10-day letter as defined in 43 CFR § 3171.12 (b)
- 5) the Secretary has not notified the operator that the requirements of the NEPA, National Historic Preservation Act, Endangered Species Act, and other applicable law have not been met, or are still under review (with an approximate date of when the review will be completed)
- 6) if on National Forest Service lands, the Forest Service has approved the Surface Use Plan of Operations.

After 45 days from the original APD submission date and satisfying items 1-6 above, the federal APD is deemed complete and approved, and the operator is permitted to move forward with drilling.

F. National Petroleum Reserve in Alaska (NPR-A) Rule

We appreciate that the Interior Secretary has identified the Management and Protection of the National Petroleum Reserve in Alaska (NPR-A) rule for review and initiated rule rescission. We agree and support BLM's direction to simply rescind the rule. The Biden administration changed the congressionally mandated management framework of the NPR-A from prioritizing oil and natural gas development to prioritizing protection of surface resources to the "maximum extent possible." The regulations should expeditiously be rescinded to restore Congress' intent and ensure the future development of Alaskan resources.

V. Fish & Wildlife Service

For too long, oil and natural gas projects have been stopped or curtailed through the weaponization of the Endangered Species Act (ESA) as a means to lock lands away from development rather than to protect truly threatened and endangered species. We appreciate that the Interior Secretary has already ordered the review of the four ESA rules from the Biden administration: 1) Critical Habitat; 2) "Blanket Rule" Applying Take Prohibitions; 3) Section 7 Interagency Consultation; and 4) Section 4(d) Incidental Take Permits.

The Alliance joined a multiple-use coalition of agriculture, energy, mining, and home builders to challenge the rules in court, but are encouraged about the prospect of settling in light of a revision to the rules.

We encourage FWS to reinstitute rules similar to the previous 2019 rules would bring more certainty to ESA regulation.

We also encourage FWS to review the listings of several species in oil and natural gas basins designated during the Biden Administration without regard to successful conservation plans including:

- the Dunes Sage Brush Lizard in New Mexico and west Texas and
- the Lesser Prairie Chicken in New Mexico, west Texas, Oklahoma, and Kansas.

These listings should be reviewed as well as proposed listings for the Monarch Butterfly, the Regal Fritillary, and the Suckley's Cuckoo Bumble Bee.

VI. BLM Land Use Planning:

A. Excessive Closures in RMPs

The Biden administration released several Resource Management Plans (RMP) that in total would lock away 7.6 million acres from oil and natural gas leasing. BLM, by willfully ignoring resource assessments that are based on today's technology, justified these closures by claiming the areas have low potential for oil and natural gas.

We appreciate that the Interior Secretary has ordered the revision of several, such as the Rock Springs RMP, and fully support a revision that recognizes the state and local community alternative that was developed over 15 years.

However, re-doing all the plans would be very time-consuming and could be counterproductive to getting other priorities achieved. Instead, the Alliance proposes a programmatic amendment to the oil and natural gas leasing closures that would revise just the excessive closures. Simply by analyzing the areas for their true potential and applying reasonable stipulations for potential leases, BLM could reduce the acreage closed while assuring environmental protections on any future development.

- [Uncompahgre Field Office RMP Amendment \(RMPA\)](#)
- [Gunnison Sage-Grouse RMPA](#)
- [Big Game Draft RMPA/EIS](#)
- [Colorado River Valley and Grand Junction Field Offices Draft RMP and Supplemental EIS](#)
- [North Dakota Revision RMP Revision and EIS](#)

B. Greater Sage-Grouse RMPA

BLM has been preparing greater sage-grouse RMP amendments for more than a decade now, with litigation on the 2015 plan amendment and the 2019 plan amendment. The Alliance is an active participant in that litigation, as a plaintiff in the 2015 litigation and an intervenor-defendant in the 2019 litigation.

We encourage BLM to work with the states to finalize records of decision (RODs) that recognize BLM's multiple-use mandate, and which are consistent with state greater sage-grouse management plans. BLM must retain flexibility related to oil and natural gas development, as well as other public uses such as livestock grazing, mining, recreation, and other energy development.

Before BLM initiated its first greater sage-grouse planning process, many of the western states were already managing for the protection and preservation of the species and its habitat, including developing and implementing plans that have consistently benefited greater sage-grouse while allowing multiple uses, and which have avoided the multiple legal challenges that BLM's plans have faced. BLM should work with the states in each state where a ROD has not been issued to finalize a plan for each state that respects existing valid rights, allows for flexibility in management, and protects the greater sage-grouse. BLM must create a balanced plan, on a state-by-state basis, which provides flexibility, benefits the species, and ends the cycle of litigation.

C. Carlsbad RMP

The Carlsbad, New Mexico RMP amendment has been languishing for more than 10 years. We encourage BLM to prioritize finishing that plan during this administration.

We strongly encourage BLM to outreach to industry and engage stakeholders to review the proposed revisions to the plan before finalizing.

D. Converse County EIS

While the Converse County, WY EIS is in litigation, BLM should enable permitting to proceed under the current, in-effect RMP. BLM has used the litigation as an excuse to stop permitting even though there is an underlying RMP that contains valid NEPA to support development.

E. Wilderness Study Areas (WSA)

BLM quietly issued a new wilderness study areas policy on October 15th in an attempt to designate more WSAs and integrate them into BLM’s National Conservation System. No public comment was taken and the solicitor’s opinion regarding the use of FLPMA Section 202 to advance this policy has not been released publicly. It has long been determined that the authority Congress granted BLM to designate new WSAs ended in the early 1990s. Further, these efforts by the bureaucracy to create de facto wilderness are unlawful, as only Congress has the authority, under the Wilderness Act of 1964, to designate wilderness. Congress defunded a similar “wildlands” effort under Interior Secretary Salazar. The Trump BLM should withdraw this policy and reverse its unlawful use in recently finalized RMPs in California, Colorado, and Oregon.

F. Withdrawals

The Biden administration withdrew 786,500 acres from oil, natural gas, and critical minerals leasing and development in three areas, the Thompson Divide, Chaco Culture National Historical Park area, and Superior National Forest. These withdrawals are well beyond the interior Secretary’s authority to withdraw 5,000 without notice and consent from Congress and NEPA analysis that follows FLPMA Section 204.

The Alliance highly encourages the Interior Secretary to overturn the Chaco withdrawal of 336,000 acres in the San Juan Basin of northwestern New Mexico which contains highly productive Mancos Shale oil resources. The withdrawal isolates mineral resources owned by Navajo allottees and prevents them from enjoying over \$194 million in royalties.

Thank you for your consideration of our comments.

Sincerely,

**Melissa Simpson
President**