

Regulatory ^[1]



Industry Is Well Regulated

One of the biggest misconceptions about the oil and natural gas industry is that it escapes regulation entirely or is very lightly regulated. In reality, the oil and natural gas industry is one of the most heavily regulated in America. Regulations that industry must comply with include the:

- Clean Air Act
- Clean Water Act
- Safe Drinking Water Act
- Endangered Species Act
- National Environmental Policy Act (NEPA)
- Comprehensive Environmental Response Compensation and Liability Act (CERCLA)
- Resource Conservation and Recovery Act (RCRA)
- Emergency Planning and Community Right-to-Know Act (EPCRA)
- Occupational Health and Safety Act (OSHA)
- National Historic Preservation Act
- Plus state and local laws

The oil and natural gas industry employs thousands of environmental and safety engineers to ensure they comply with all regulations while spending billions of dollars on [environmentally beneficial technologies](#).^[2] Companies also continually innovate to produce more oil and natural gas with greater efficiency, which delivers environmental benefits. Companies constantly implement new technologies and better practices that go above and beyond what's required by regulation to further reduce impacts to wildlife, air, water and the land (see [Environmental Stewardship](#)).^[3] However, when mistakes are made or accidents occur, companies are held accountable by state and federal regulators and must correct the situation.

Despite existing regulation and the myriad steps companies take to ensure safe and environmentally protective operations, federal agencies continually institute more regulations that are often redundant while delivering little environmental benefit when compared to the societal cost. Costly regulation takes productive resources away from job creation and economic growth and puts it into red tape. [A Small Business Administration report](#)^[4] shows that regulations cost American businesses \$1.75 trillion annually. The many small independent businesses that make up the oil and natural gas industry are disproportionately squeezed by redundant, costly regulations.

Federal vs. State vs. Local Regulation

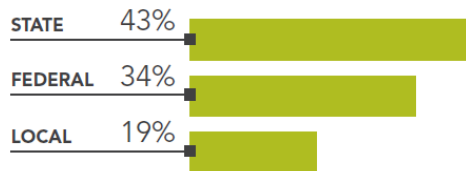
One area of contention is determining at what level of government industry should be regulated. The environmental community pushes for increasingly more federal regulations, making the erroneous argument that federal bureaucrats know better than state regulators about how to preserve a state's own air, land and geology. On the other end of the spectrum are community groups, ironically often supported by those same environmental groups, that argue for local control of oil and natural gas development at the county or city level. In reality, these environmental groups have an agenda of stopping oil and natural gas development and are agitating for local control as a means of banning development. Most cities and counties have neither the resources nor the expertise to effectively regulate the oil and natural gas industry.

States with oil and natural gas development, on the other hand, have a long history of successfully regulating the industry. States have oil and gas commissions with experts on such topics as the state geology and effective industry practices that work in their states. They have environmental agencies that implement federal statutes such as the Clean Air Act and the Clean Water Act. Federal regulators are too far removed from the specific regulatory needs of each state, and have a tendency to put in place one-size-fits-all regulations that do not work well for the particular conditions of each state.

States are also more nimble and able to adjust regulations with advances in technology and industry practices. For example, all states with any sizeable oil and natural gas development have wellbore integrity and hydraulic fracturing rules, which makes any new federal rules unnecessary. For example, [the Bureau of Land Management's \(BLM\) hydraulic fracturing rule](#)^[5] is redundant since 100% of [permits to drill approved](#)^[6] by BLM in 2014 were in states with recently updated fracking regulations

[Governors of energy producing states](#)^[7], both Democrats and Republicans, agree that states should be the primary regulator of oil and natural gas development. States are both flexible and effective in regulating the industry and are supported by the [Interstate Oil and Gas Compact Commission](#)^[8] and the [Ground Water Protection Council](#)^[9] to ensure state regulators continue their exemplary health and safety records. And the public understands this as well. [Nationwide polling](#)^[10] shows that a majority, 62%, does not want centralized control of energy development.

Which level of government should be the prime authority for energy development, including hydraulic fracturing.



A majority, 62%, does not want central control of energy development.



Regulatory Comments

Below are comments submitted by Western Energy Alliance on various regulatory issues.

- [9/21/2019 Oregon Coastal Management Program - Jordan Cove](#) ^[11]
- [9/13/2019 EPA FIP Amendments - ESA NHPA with UPA](#) ^[12]
- [9/3/2019 STB Uinta Basin Railway](#) ^[13]
- [7/1/2019 EPA Oil and Gas Wastewater Draft Study](#) ^[14]
- [4/15/2019 EPA WOTUS Redefinition with IPAA AXPC DEPA](#) ^[15]
- [12/17/2018 EPA OOOOa Revisions](#) ^[16]
- [12/10/2018 EPA-NM Produced Water White Paper](#) ^[17]
- [11/21/2018 PSCAA Puget Sound Energy LNG DSEIS](#) ^[18]
- [10/31/2018 UDAQ Associated Gas Flaring Rule](#) ^[19]
- [8/13/2018 EPA WOTUS Supplemental Notice with AXPC DEPA](#) ^[20]
- [7/2/2018 EPA National FIP Amendments](#) ^[21]
- [6/28/2018 EPA New Owner Self Audit Policy](#) ^[22]
- [4/23/18 BLM Waste Prevention Rule with IPAA](#) ^[23]
- [2/5/2018 EPA Ozone 120 Day Letter Comments](#) ^[24]
- [1/16/2018 EPA Proposed Clean Power Plan Repeal](#) ^[25]
- [12/8/2017 EPA OOOOa Notice of Data Availability](#) ^[26]
- [11/10/2017 BLM, OMB Venting and Flaring Information Collection Comments with IPAA](#) ^[27]
- [11/6/2017 BLM Venting and Flaring Rule Delay Comments with IPAA](#) ^[28]
- [10/31/2017 EPA Strategic Plan](#) ^[29]
- [10/17/2017 EPA Control Device Cost Manual](#) ^[30]
- [9/25/2017 BLM Hydraulic Fracturing Rule](#) ^[31]
- [9/25/2017 EPA Waters of the U.S. Recodification of Pre-Existing Rules](#) ^[32]
- [9/18/2017 EPA Clean Air Scientific Advisory Committee Nominees](#) ^[33]
- [8/9/2017 EPA OOOOa Stay Comments](#) ^[34]
- [7/10/2017 FERC Jordan Cove LNG Terminal EIS Scoping](#) ^[35]
- [5/16/2017 EPA Regulatory Reform Comments](#) ^[36]
- [12/19/2016 EPA Wyoming Interstate Transport SIP Approval](#) ^[37]
- [11/15/2016 EPA Emerging Methane Technology Request for Information](#) ^[38]
- [10/31/2016 EPA Information Collection Request - Second Round of Comments](#) ^[39]
- [8/2/2016 EPA Information Collection Request](#) ^[40]
- [4/22/2016 BLM Venting and Flaring with IPAA, AXPC, and USOGA](#) ^[41]
- [3/15/2016 EPA Greenhouse Gas Reporting Program Changes with IPAA, AXPC](#) ^[42]
- [3/8/2016 BLM Venting and Flaring Information Collection Requirements with IPAA, AXPC](#) ^[43]
- [12/23/2015 NPS 9B Regulations with API, IPAA, and AXPC](#) ^[44]
- [12/14/2015 BLM Onshore Order No. 3 with IPAA](#) ^[45]
- [12/14/2015 BLM Onshore Order No. 4 and No. 5](#) ^[46]
- [12/14/2015 BLM Onshore Order No. 4 with API and IPAA](#) ^[47]
- [12/14/2015 BLM Onshore Order No. 5 with API and IPAA](#) ^[48]
- [12/9/2015 EPA NSPS JJJJ](#) ^[49]
- [12/4/2015 EPA NSPS OOOOa and CTG](#) ^[50]
- [12/4/2015 EPA Tribal NSR](#) ^[51]
- [12/4/2015 EPA Source Determination](#) ^[52]
- [11/13/2015 Methane Challenge with IPAA and AXPC](#) ^[53]
- [10/16/2015 Extension Request for EPA, BLM Proposed Oil and Gas Rules](#) ^[54]
- [10/9/2015 BLM Onshore Order No. 3](#) ^[55]
- [8/28/2015 EPA Hydraulic Fracturing Study](#) ^[56]
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- [7/6/2015 EPA Quad O SBAR Panel](#) ^[58]
- [4/22/2015 Quad O Storage Vessel Definition](#) ^[59]
- [3/17/2015 Ozone NAAQS 2015](#) ^[60]
- [2/22/2015 Greenhouse Gas Reporting Rule 2015 Revisions](#) ^[61]
- [11/26/2014 Bureau of Indian Affairs Proposed Rule for Rights-of-Way](#) ^[62]
- [11/14/2014 EPA Waters of the United States](#) ^[63]
- [9/18/2014 TSCA ANPR for Fracking Chemical Reporting](#) ^[64]
- [8/20/2014 EPA Tribal NSR ANPR for Oil and Natural Gas Permits](#) ^[65]
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- [8/4/2014 US Forest Service Groundwater Directive](#) ^[68]
- [7/31/2014 Utah Division of Air Quality Four Rules for Oil and Natural Gas](#) ^[69]
- [6/16/2014 Methane White Paper with IPAA](#) ^[70]
- [5/30/2014 BLM Venting and Flaring Outreach](#) ^[71]
- [4/24/2014 Western Energy Alliance Subpart W Revision with AXPC](#) ^[72]
- [3/28/2014 Utah Division of Air Quality General Approval Order](#) ^[73]
- [3/17/2014 Tribal NSR with AXPC](#) ^[74]
- [1/27/2014 Social Cost of Carbon to OMB](#) ^[75]
- [12/23/2013 Utah Division of Air Quality GAO for Oil and Gas Draft 12/12/13](#) ^[76]
- [11/22/2013 Quad O Tank Amendments Petition for Reconsideration](#) ^[77]
- [11/6/2013 EPA Water Connectivity Report for Science Advisory Board Panel](#) ^[78]
- [11/4/2013 USFWS Incidental Take Statements with USOGA](#) ^[79]
- [10/7/2013 EPA Effluent Limitation Guidelines for CBM](#) ^[80]
- [9/24/2013 EPA Change to Global Warming Potential of Methane](#) ^[81]
- [9/20/2013 ONRR Service of Official Correspondence](#) ^[82]
- [8/30/2013 Utah Division of Air Quality General Authority](#) ^[83]
- [8/22/2013 BLM Hydraulic Fracturing Rule](#) ^[84]
- [5/29/2013 SAB Effluent Limitation Guidelines for CBM](#) ^[84]

- [5/28/2013 EPA NSPS OOOO Reconsiderations for Tanks](#) ^[85]
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- [3/24/2013 EPA 2013 US Greenhouse Gas Inventory](#) ^[87]
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- [11/20/2012 Noble Ball 3D Seismic EA](#) ^[89]
- [10/5/2012 DOT FMCSA Hours of Service](#) ^[90]
- [8/27/2012 EPA Environmental Justice in Air Permitting](#) ^[91]
- [11/30/2011 EPA NSPS OOOO](#) ^[92]

Feature content:

No

Quick Facts:

- Western Energy Alliance is a [strong supporter](#) ^[93] of the [REINS Act](#) ^[94] (Regulations from the Executive in Need of Scrutiny), which aims to rein in out-of-control federal regulation with congressional oversight.
- From 2004 to 2014, EPA's regulations cost more than [five times as much](#) ^[95] as the next most costly agency.
- [The average U.S. company paid](#) ^[96] \$233,182 to comply with federal rules. That's almost \$20,000 per employee on average, with small companies hit the hardest. Those with fewer than 50 employees pay compliance costs over \$34,000 per employee.

Related Content:

[Committee Meetings](#) ^[97]

[Federal Regulatory Burden on the Oil & Natural Gas Industry](#) ^[98]

[Regulatory Obsession with Oil and Natural Gas](#) ^[99]

[The Impact of Regulatory Costs on Small Firms, SBA](#) ^[100]

[The Total Cost of Federal Regulations, NAM](#) ^[96]

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- [3] <http://www.westernenergyalliance.org/why-western-oil-natural-gas/protecting-environment/environmental-stewardship-video-series>
- [4] <https://www.sba.gov/sites/default/files/The%20Impact%20of%20Regulatory%20Costs%20on%20Small%20Firms%20%28Full%29.pdf>
- [5] <http://cdn.westernenergyalliance.org/sites/default/files/Final%20IPAA%20Western%20Energy%20Alliance%20Comments%20-%20BLM%20Fracing%20Rule%208.22.13.pdf>
- [6] http://www.blm.gov/wo/st/en/prog/energy/oil_and_gas/statistics.html
- [7] http://media.wix.com/ugd/d3e01e_c3e77a0481834744b5bc97c1b03ca4ad.pdf
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