

Federal Regulatory Burden on the Oil & Natural Gas Industry

April 2016

Western Energy Alliance has responded to **47 regulatory processes involving 49,226 pages of documents** from just the Environmental Protection Agency (EPA) and the Interior Department over the last year. This does not include regulations from other agencies, such as the Occupational Safety and Health Administration (OSHA), Federal Energy Regulatory Commission (FERC), Pipeline and Hazardous Materials Safety Administration (PHMSA), Department of Energy (DOE), Securities and Exchange Commission (SEC) and other agencies likewise putting out thousands of pages of regulations that affect oil and natural gas producers, but which the Alliance does not happen to cover.



The administration is imposing an overwhelming number of new rules on the oil and natural gas industry that cumulatively extend far beyond reasonable regulatory oversight and into mechanisms for controlling and slowing production in America. Never mind that the industry forms the basis of the economy and enables the healthy, safe, and comfortable lifestyle that Americans enjoy.

Oil and natural gas development should be and already is heavily regulated. But the regulations we are seeing now are not about managing legitimate risks or addressing real problems. They are about imposing as much new regulation as possible before the clock runs out on the Obama Administration.

The following table lists of all 47 proposed regulations over the last year with details including links to the rules and to the comments submitted by the Alliance.

Planning/Regulatory Document	State/Agency	Comment Deadline	Date Submitted, Comments Linked	Number of Pages	Days to Comment
Apr-16					
Venting and Flaring	BLM	4/22/2016	4/22/2016	589	75
Mitigation Policy	USFS	4/18/2016	4/12/2016	3	12
Mar-16					
Greenhouse Gas Reporting Program Changes	EPA	3/15/2016	3/15/2016	80	47
90-Day Finding on Great Basin Butterfly	FWS	3/14/2016	3/10/2016	28	60
90-Day Finding on Narrow-foot Diving Beetle	FWS	3/14/2016	3/10/2016	26	60
Venting and Flaring Information Collection Requirements	OMB	3/8/2016	3/8/2016	589	30
Feb-16					
Roan Plateau DEIS	BLM	2/18/2016	2/18/2016	1,258	90
Methodology for ESA Status Reviews	FWS	2/16/2016	2/16/2016	14	30
National Wildlife Refuge System	FWS	2/9/2016	2/9/2016	31	60
Jan-16					
White River National Forest Leases	BLM	1/8/2016	1/8/2016	1,344	49

Planning/Regulatory Document	State/Agency	Comment Deadline	Date Submitted, Comments Linked	Number of Pages	Days to Comment
Dec-15					
9B Regulations	NPS	12/28/2015	12/23/2015	616	63
Onshore Order Number 5	BLM	12/14/2015	12/14/2015	275	60
Onshore Order Number 4	BLM	12/14/2015	12/14/2015	113	75
Onshore Order Number 3 Reopened	BLM	12/14/2015	12/14/2015	203	21
NSPS JJJJ	EPA	12/9/2015	12/9/2015	100	93
Tribal NSR	EPA	12/4/2015	12/4/2015	1,300	78
NSPS OOOOa	EPA	12/4/2015	12/4/2015	1,300	78
Source Determination	EPA	12/4/2015	12/4/2015	203	21
CTGs	EPA	12/4/2015	12/4/2015	100	93
Nov-15				1,300	78
Moab MLP	BLM	11/23/2015	11/23/2015	647	90
Regal Fritillary Petition	FWS	11/17/2015	11/17/2015	29	60
Enhanced Gas STAR Methane Challenge	EPA	11/13/2015	11/13/2015	34	114
Oct-15					
Onshore Order No. 3	BLM	10/9/2015	10/9/2015	203	90
Sep-15					
ESA Petition Process	FWS	9/18/2015	9/18/2015	45	60
Aug-15					
EPA HF Study	EPA	8/28/2015	8/28/2015	998	85
Onshore Order No. 3 Regulatory Burden	OMB	8/12/2015	8/12/2015	203	30
Jul-15					
Royal Gorge RMP Scoping Comments	BLM	7/31/2015	7/31/2015	8	60
Migratory Bird Permits	FWS	7/27/2015	7/27/2015	16	60
NV Lease Sale	BLM	7/24/2015	7/24/2015	237	
EPA SBAR Panel for Quad O 2.0	EPA	7/6/2015	7/6/2015	689	20
Jun-15					
12 GrSG Land Use Plans	BLM	6/29/2015	6/29/1985	33,444	30
May-15					
EPA SBAR Pre-Panel for Quad O 2.0	EPA	5/28/2015	5/27/2015	53	18
Oil, Gas & Coal Valuation Rule	ONRR	5/8/2015	5/8/2015	69	120
Grand Junction PRMP Protest	BLM	5/10/2015	5/11/2015	3,484	30
Apr-15					
EPA Quad O Storage Vessel Definition	EPA	4/27/2015	4/27/2015	20	30
White River PRMPA Protest	BLM	4/28/2015	4/24/2015	2,317	30
			Total	49,226	Ave. 58.6