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June 8, 2017

The Honorable Ryan Zinke  
Secretary of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

**RE: Request to Postpone Compliance Dates for BLM Rule – Waste Prevention, Production Subject to Royalties and Resources Conservation (81 Federal Register, 83008)**

Dear Secretary Zinke,

The Petroleum Equipment and Services Association (PESA) – the national trade association for the oilfield service, supply and manufacturing sector – appreciates your leadership in promoting responsible development of our domestic oil and natural gas resources. We support the Department of Interior’s (DOI’s) review of the rule entitled “Waste Prevention, Production Subject to Royalties, and Resource Conservation.” Given that DOI’s review may take an extended period of time, PESA requests compliance dates for the subject rule be extended for at least two years.

PESA represents approximately 200 companies that provide the services, technology, equipment and expertise necessary to safely and efficiently explore and produce oil and natural gas. Our members are committed to advancing safety, environmental stewardship and ensuring that society’s continued economic progress is fueled through the sustainable development of our natural resources.

Per a March 28, 2017, Executive Order on promoting energy independence and economic growth, President Donald Trump requested that the DOI review the subject rule for consistency with current energy policy. The rule is to be suspended, revised or rescinded if the DOI determines the rule is inconsistent with the Administration’s policy to promote clean and safe development of energy resources without unnecessary regulatory burdens.

On March 29, per Secretarial Order 3349, the Bureau of Land Management (BLM) was instructed to move forward with assessing the subject rule. Since BLM’s assessment is ongoing and final resolution will take time, it is prudent to postpone compliance deadlines so that companies do not take actions and make expenditures that may eventually be deemed unnecessary if the rule is suspended, revised or rescinded. To provide certainty to stakeholders impacted by this rule, PESA asks that the DOI take prompt action to postpone compliance deadlines, some of which occur in less than a year.

PESA appreciates your consideration of our comments. Should you have any questions, please contact Jean Gould, Sr. Director Public Policy at [jgould@pesa.org](mailto:jgould@pesa.org) or 713-933-1920.

Sincerely,

Leslie Beyer  
President

c: Mr. Michael D. Nedd  
Acting Director, BLM  
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