

United States Department of the Interior

ID: LFG-2018-0013

Director (630)

Bureau of Land Management

Mail Stop 2134 LM

1849 C. Street, NW

Washington, D.C 20240

April 16th, 2018

Re: BLM-2018-0001/RIN: 1004-AE53

Dear United States Department of Interior,

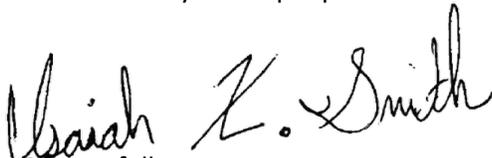
I am sending you this comment on the proposed rule. When looking at the procedural history of this issue, it should be noted that on November 18th, 2016, the United States Bureau of Land Management published in the Federal Register a final rule entitled, "Waste Prevention, Production Subject to Royalties, and Resource Conservation." After it was reconsidered the cost, complexity, and other implications of the 2016 final rule, the United States Bureau of Land Management is now proposing to revise the 2016 final rule in a manner that reduces unnecessary compliance burdens, is consistent with the United States Bureau of Land Management's existing statutory authorities and re-establishes longstanding requirements that the 2016 final rule replaced. As part of the comment on this proposed rule, the United States Bureau of Land Management wants to know our opinions on the proposed rule and the ways that the United States Bureau of Land Management can reduce the waste of gas by incentivizing the capture, reinjection, or beneficial use of the gas. I will first discuss my opinion on the proposed rule and then I will discuss the ways in which I believe that the United States Bureau of Land Management will be able to reduce the waste of gas by incentivizing the capture, reinjection, or beneficial use of the gas.

The Methane and Waste Prevention Rule is something that the United States Department of Interior is trying to revise and dismantle as part of this proposal. Methane is a greenhouse gas in which has harmful effects in oil and gas operations that result in leaks. Methane is known to trap eighty-six (86) more heat to the atmosphere in comparison to carbon dioxide, in the short term. When oil and gas operations occur, it is known that methane, along with formaldehyde, ethylbenzene, and other toxic air pollutants are released into the environment. The release of such harmful air pollutants into the environment does cause harm to the health of residents that live and work near oil and gas operations and further, it is known that methane does contribute to heat waves, drought situations, sea levels rising, flooding, water contamination situations, ozone pollution and other things that are harmful or that do have the potential as to being harmful to the environment and to the general public occurring. So, I am having a hard time understanding, as well as I would assume the majority of members of the public that respect the environment, as why the United States Department of Interior would ever try to revise or to dismantle the Methane and Waste Prevention Rule. This is believed to be the cause of some political figures in the United States that have a complete or a total reckless disregard as to respecting

the environment¹ or that have a complete or a total reckless disregard as to working to help reduce climate change that is and that has been occurring in our world.²

As far as this proposal is concerned, I would like it to be known that I am in opposition to the United States Department of Interior's plan to weaken the Methane and Waste Prevention Rule. The Methane and the Waste Prevention Rule does help ensure that there is a reduction to emissions of methane. The reduction of greenhouse gases, in which methane is a part of, helps ensure that there is a significant reduction in heat waves, drought situations, sea levels rising, flooding, water contamination situations, ozone pollution and other things that are harmful or that do have the potential as to being harmful to the environment and to the general public is reduced. Another benefit of the Methane and Waste Prevention Rule is that it helps ensure that there is a reduction in dangerous volatile organic compound emissions. So, I again do not understand why the United States Department of Interior wants to revise and essentially dismantle the Methane and Waste Prevention Rule when it is greatly needed. Therefore, I must be in opposition to any attempt to revise and dismantle the Methane and Waste Prevention Rule.

As far as how I believe that the Bureau of Land Management of the United States Department of Interior, will be able to reduce the waste of gas by incentivizing the capture, reinjection, or beneficial use of the gas, I believe that this can be done by the United States Department of Interior creating some type of mandate or rule that will require oil and gas companies to inspect sites for methane leaks on at least a quarterly basis as some leading states in the United States already do require. I also believe that the United States Department of Interior needs to help create a rule that will establish a rule that will establish some type of maximum amount of methane in the air requirement, in which should be applied around or near oil and gas operations in which oil and gas companies are involved in. I believe that establishing such a requirement will help ensure that the health and the safety of individuals that live near or that work near sites where oil and gas operations are taking place, are stable and that the health and the safety of the people are not threatened.


Respectfully,

Isaiah X. Smith³

¹ Some political figures in the United States believe that it is not necessary to respect the environment. Individuals that reside on Planet Earth do not currently have another planet that they will be able to migrate to if the living conditions on Planet Earth become unlivable, due to the destruction of the environment based on human activities.

² Some people refer to climate change as global warming. While it is true that global warming is occurring in our world, global warming is not the only climate change situation that is occurring on our world. That is why climate change is the correct and the proper term to use.

³ www.isaiahxsmith.com