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RE: USGS-2025-0039; 2025 Draft List of Critical Minerals

As a coalition of oil and natural gas trade associations representing over 80 percent of domestic oil and natural gas production in the United States, we write regarding the treatment of natural barium sulfate (barite) in the ongoing geological survey being conducted by the Department of the Interior. We support the Administration's efforts to address the serious issues raised in this investigation and to safeguard the competitiveness and availability of critical minerals of U.S. technology, manufacturing, and energy sectors. We also appreciate the Administration's commitment to hearing from affected industries to ensure that the impacts of any proposed tariffs do not unintentionally undermine the goals of Energy Dominance and National Security.

We note that the Department of the Interior declared natural barium sulfate ("barite") a critical mineral in the 2018 Final List (83 FR 23295, May 18, 2018). We further note that the U.S. Geological Survey included barite in its 2025 Draft List (90 FR 41591, August 26, 2025).

We feel this is a positive step in continuing to recognize the oil and gas industry's heavy reliance on barite and the critical need for barite to remain available. USGS reports that approximately 2 million metric tons of barite were imported into the United States, with 90 percent consumed by the oil and gas industry. Barite is an irreplaceable product. It is used as a weighting agent in 95 percent of wells drilled in the United States, including major offshore projects in the Gulf of America. Globally, 75 percent of barite demand is for this drilling application. Its unique non-toxic, chemically inert, and non-abrasive properties make it the only cost-effective option for safe, productive drilling. Alternatives are either cost prohibitive or metallic in nature, which decreases drilling productivity.

Without affordable and reliable access to barite, oil and gas operations in the United States would become more expensive, potentially more dangerous, and production would slow. All of these outcomes would be counterproductive to U.S. national and energy security.

Compounding the critical nature of barite in the United States is that domestic mines have been substantially depleted and no new commercial-scale operations are capable of reducing the reliance on barite imports. Given this fact, although barite is certainly a critical mineral, we urge that its listing does not support the imposition of any additional tariffs or other supply chain disruption mechanisms on its importation until which time an affordable and reliable domestic source can be secured. This course of action aligns with the Administration's stated goals by protecting American energy development, ensuring the continued strength of U.S. oil and natural gas production, and avoiding unintended harm to American companies, workers, and consumers.

Sincerely,

Energy Workforce & Technology Council
Gulf Energy Alliance
International Association of Drilling Contractors
Independent Petroleum Association of America
National Ocean Industries Association
U.S. Oil & Gas Association
Western Energy Alliance