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Via Regulations.gov

April Lockler
Director, Office of Natural Resources Revenue
U.S. Department of the Interior
Denver Federal Center
Building 85, Entrance W-3
Sixth Avenue and Kipling Street
Denver, Colorado 80225

Subject: **Docket ID ONRR–2025–0001**; RIN 1012–AA39
Comments of the National Ocean Industries Association ("NOIA") in response to the Office of Natural Resources Revenue ("ONRR") Proposed Rule, Federal Oil, Gas, and Coal Amendments

Dear Ms. Lockler:

The National Ocean Industries Association ("NOIA") appreciates the opportunity to submit comments on the Office of Natural Resources Revenue's ("ONRR") proposed rule to amend its royalty valuation regulations for production from federal oil and gas leases onshore and on the Outer Continental Shelf ("OCS"). 91 Fed. Reg. 39,754 (June 30, 2026) ("Proposed Rule"). NOIA is the voice and advocate for the offshore oil and gas industry, representing the interests of the full supply chain, including the vast range of operators, leaseholders, and contractors developing oil and gas on the U.S. Outer Continental Shelf ("OCS"). NOIA and its members appreciate and support ONRR's efforts to reduce costs and burdens to industry and the federal government by simplifying regulatory requirements and to ultimately incentivize production to unleash energy dominance.

NOIA generally supports the Proposed Rule. Our comments herein focus only on the proposed regulatory changes that would affect valuation for royalty purposes of oil and gas production from leases on the OCS.

The Interests of the Offshore Energy Industry

For more than 50 years, NOIA has represented the interests of all segments of the offshore energy industry, including offshore oil and gas, offshore minerals, offshore carbon sequestration, and offshore wind. Our membership includes energy project operators, leaseholders, and developers along with the entire supply chain of companies that make up an innovative ecosystem contributing to the safe and responsible exploration, development, and production of U.S. energy and mineral resources.

Offshore energy is not simply a regional issue confined to the Gulf of America or the

Alaska, Pacific, or Atlantic coasts, or to the states immediately adjacent to offshore projects. Every U.S. state has jobs, investment, and economic activity directly linked to offshore energy, through manufacturing, engineering, logistics, fabrication, shipbuilding, and a wide range of support services.

The Gulf of America is globally recognized as a premier energy hub, bringing together the companies that produce foundational energy sources such as oil and gas, while leading innovation and investment in energy sources and technologies that will drive decarbonization efforts well into the future. For the foreseeable future, the U.S. offshore energy sector will play an integral role in shaping an energy system that promotes affordable, reliable energy while continuing to support good-paying jobs throughout the country. Importantly, for the coming decades, oil and gas supplies will remain a vital energy source for Americans and our allies around the globe; the U.S. offshore energy sector has proven its role as a reliable supplier for the past 80 years. The U.S. has been producing oil in the federal Gulf of America waters since the 1940s. Production from the Gulf has been steadily increasing over the past 30 years. In fact, this region has been producing more than one million barrels of oil per day since 1997 and is currently producing at record levels of more than 2 million barrels per day. However, for the U.S. to sustain offshore oil production, we need to ensure a supportive and predictable regulatory framework is in place for royalty valuation.

Offshore oil and gas development is globally competitive, with companies balancing significant capital requirements and risks against uncertain commodity prices while evaluating costs, technology, and access to resources across producing regions. The oil and gas industry has not been immune to inflationary pressures, with costs of everything from equipment to drilling rigs to personnel and services rising significantly over the past few years. There has also been a reduction in the number of companies offering critical services for offshore development. The global offshore industry accounts for about 25-30 million barrels of oil per day, while U.S. production is at about 2 million barrels per day. The U.S. basin, therefore, is in competition with other regions for capital investment. Furthermore, the barriers to entry into the market are high from an economic standpoint. The number of U.S. deepwater operators has declined over the past 10 years, from about 30 to 11, highlighting the sector's difficulties. Fortunately, investment continues to flow at more than $30 billion per year; companies have continued to actively pursue new lease blocks; and various major projects have come online or will be coming online over the next few years. The proposed changes to the royalty valuation regulations therefore come at an opportune time and should help blunt challenges facing the industry.

While the Gulf of America and the broader U.S. OCS have tremendous remaining energy resource potential, production is projected to begin declining around 2030. Rising development and service costs, combined with a globally competitive offshore market, have made substantial resource production opportunities uneconomic.

Offshore development works on timelines measured in years and decades, with each project evaluated on its own economics. When a project can take more than a decade to reach production and requires billions of dollars in capital before first oil, competitive government fiscal terms – including certainty in royalty valuation – materially affect whether U.S. offshore projects move forward. The proposed revisions to ONRR's royalty valuation regulations would promote greater investment certainty by providing clearer, updated valuation requirements that are consistent with the underlying statutes. As stated in the preamble to the Proposed Rule, "the proposed changes could create financial incentive to industry resulting in long-term increase to production of resources from Federal lands and waters."

The economic effects of royalty valuation are particularly pronounced for deepwater OCS projects because those projects commonly require extensive subsea infrastructure to move production from the well to a host facility and onward to market. Flowlines, risers, umbilicals, compression, pumping and related transportation equipment may require substantial investment before first production and may serve reservoirs located significant distances from existing infrastructure. Where royalty valuation rules disallow or arbitrarily limit recovery of actual transportation and processing costs, the resulting royalty value may overstate the value realized by the lessee and may adversely affect the economics of otherwise developable resources. A final rule that clearly recognizes allowable transportation and processing costs will improve the predictability of project economics and support more efficient development of federal offshore resources.

The benefits of these revisions also extend to the federal government and the public. Royalty valuation rules that improve investment certainly can facilitate production that may otherwise be delayed, reduced, or left undeveloped. Additional production from federal leases can generate long-term royalty receipts, rentals, and other revenues while supporting employment, domestic supply chains, and the continued use of existing offshore infrastructure. The Proposed Rule should be viewed not only in terms of near-term changes in reported royalty value, but also in terms of its potential to support additional investment, extend the productive life of federal leases and facilities, and increase the volume of royalty-bearing production over time.

Pursuant to Executive Order 14156, "Declaring a National Energy Emergency," agencies are directed to "identify and exercise any lawful emergency authorities available to them, as well as all other lawful authorities they may possess, to facilitate the identification, leasing, siting, production, transportation, refining, and generation of domestic energy resources."

Pursuant to Executive Order 14154, "Unleashing American Energy," it is the policy of the United States "to encourage energy exploration and production on Federal lands and waters, including on the Outer Continental Shelf, in order to meet the needs of our citizens and solidify the United States as a global energy leader long into the future." This objective is the first policy priority listed in the Order.

Read together, these Executive Orders establish a clear policy direction for federal agencies. Given the challenges of developing offshore oil and gas resources, the proposed changes to the federal oil and gas valuation regulations will advance domestic energy production consistent with the President's direction. We thus support the prompt finalization of the amended regulations, consistent with our comments.

Comments on ONRR's Proposed Regulatory Changes

ONRR's 2016 final rule (81 Fed. Reg. 43,338 (July 1, 2016)) ("2016 Rule") reshaped federal royalty valuation by adopting several significant and problematic alterations to longstanding principles. NOIA therefore supports ONRR's proposal to undo many aspects of the 2016 Rule and to restore the historical balance to royalty valuation guidelines upon which OCS lessees long relied. NOIA also supports ONRR's proposed other improvements to the ONRR royalty valuation regulations. However, there are certain issues with the Proposed Rule that ONRR can, and should, clarify in its final rule. Specifically, ONRR should adopt NOIA's comments and make the suggested changes to any final federal oil and gas valuation regulations.

Unless indicated otherwise, all references in these comments are to C.F.R. Title 30.

A. Restoring Historical Distinctions Between Gathering and Transportation for OCS Production

In the 2016 Rule, ONRR upended its historical interpretation of gathering (the costs of which are not deductible in determining the value of oil and gas production for royalty purposes) and disregarded the unique context of the deepwater OCS that often necessitates long-distance movement of production before it reaches the first platform facility. Under the 2016 Rule, no subsea movement to the first OCS platform can ever qualify for a transportation allowance, no matter the distances or other factors involved. The 2016 Rule deems significant movement of oil and gas as non-deductible gathering (a cost to place production in marketable condition) instead of deductible transportation, thereby depriving OCS lessees of the expected return on their substantial investments in deepwater development.

The Proposed Rule would make several significant improvements, amending the definition of gathering in § 1206.20 "by clearly identifying the locations at which gathering ends and where transportation begins." 91 Fed. Reg. at 39757. For OCS leases, gathering would be limited in § 1206.20 to movement to the closest of three points to the well: "(i) the first point at which the production from two or more wells accumulate; (ii) the point at which the production from a well is first separated into discrete constituents; or (iii) the boundaries of the lease."

NOIA supports the proposed changes to the gathering definition because they implement a more workable framework than the 2016 Rule. NOIA supports ONRR's proposal to return to its longstanding view of gathering vs. transportation on the OCS as expressed in ONRR's May 1999 Deep Water Policy and in place for over 15 years before the 2016 Rule upended that framework. The Proposed Rule would properly reinstitute the Department's longstanding pre-2016 policy that correctly treated much of the subsea bulk movement of deepwater OCS oil and gas as transportation subject to an allowance in determining the royalty value. The Proposed Rule also supports increased production through more modern and efficient technologies. To economically develop and produce Gulf of America energy, offshore operators today frequently connect offshore oil and gas developments to existing production facilities through pipelines and related infrastructure. These "tiebacks" to existing platforms and facilities enable the extraction of oil and gas from remote or deep locations. The Proposed Rule supports increased tieback development by properly treating movement to the existing facilities as transportation rather than gathering.

However, in a final rule, ONRR should clarify several provisions relating to proposed paragraph 2 of the definition of OCS "gathering" in § 1206.20 to further distinguish it from transportation.

1. Under the Proposed Rule, "the point at which the production of a well is first separated into discrete constituents" is unclear. ONRR should revise proposed subparagraph (ii) of paragraph 2 to read as "for either oil or gas produced from a well, the point at which that product is first separated into a discrete constituent product."

2. The proposed definition's reference to "the first point at which the production from two or more wells accumulate" may lead to arbitrary results. Movement from a subsea manifold after two wells are accumulated should be treated the same as movement from a single well manifold.

3. If oil or gas is moved across lease lines, ONRR should clarify that costs should be allocated proportionately as to on-lease vs. off-lease movement based on distance.

If ONRR adopts the proposed definition of gathering in a final rule, it also should delete §§ 1206.110(a)(1)(ii) (oil) and 1206.152(a)(2)(ii) (gas) from the existing transportation allowance regulations because they would be inconsistent with the proposed new definition of gathering. ONRR also should remove existing §§ 1206.110(a)(1) (oil) and 1206.152(a)(2) (gas) as unnecessary because the proposed gathering definition sets out specific points at which movement of oil and gas becomes transportation.

NOIA also strongly supports ONRR's other proposed changes to the transportation allowance regulations in §§ 1206.111(oil) and 1206.153 (gas), including those relating to flow assurance costs and various platform-related costs associated with transportation, which would further increase regulatory clarity and certainty while properly recognizing several costs as transportation-related. However, ONRR should ensure that the regulations are able to accommodate multiple designs by making the list of allowable items a non-exhaustive list rather than attempting to list every allowable piece of equipment in the regulations. ONRR also should clarify in a final rule that costs for repairing, replacing, or restoring operability of a plugged or damaged pipeline may be deducted for mixed-use pipelines, subject to reasonable allocation.

Flow assurance activities are integral to the transportation function in deepwater environments. Hydrate prevention, paraffin and wax management, scale control, chemical injection, pigging, insulation, heating and similar measures may be necessary to maintain operability and permit the continuous movement of production through a pipeline or other transportation system. These activities should not be treated as non-deductible production or marketable-condition costs merely because they also protect equipment or preserve product quality while production is being transported. The final rule should confirm that reasonable flow assurance costs with a clear and documented connection to allowed transportation equipment are deductible transportation costs, regardless of the particular engineering design used for a project.

Finally, in the preamble to the Proposed Rule, ONRR explains that "directly allocable costs" are costs that have "a clear connection to the allowed transportation equipment and can be accurately quantified." 91 Fed. Reg. at 39759. This term is not clearly defined and potentially increases the burden on operators. We recommend reverting to the prior language of allowing a reasonable allocation. At minimum, ONRR should appropriately define the term "directly allocable costs" in a final rule.

B. Extending Index-Based Valuation to Arm's-Length Disposition of Natural Gas and Natural Gas Liquids

ONRR's existing federal oil and gas valuation regulations provide that for arm's-length sales of unprocessed and processed gas, value for royalty purposes must be based on the "gross proceeds" accruing to the lessee or its affiliate, less applicable transportation allowances and processing allowances. §§ 1206.141(b), 1206.142(b), (c). For non-arm's-length dispositions of unprocessed gas, residue gas and natural gas liquids ("NGLs"), the current regulations provide the lessee an option to elect a simpler, index-based valuation. §§ 1206.141(c), (d); 1206.142(c), (d).

ONRR proposes to amend §§ 1206.141(c) and 1206.142(d) to similarly provide lessees an index-based option to report and pay royalties on their arm's-length dispositions of both unprocessed gas and residue gas/NGLs. ONRR also proposes several other modifications to the available index-based valuation methodology that would apply both to non-arm's-length and arm's-length dispositions of unprocessed gas, residue gas, and NGLs.

NOIA strongly supports ONRR's proposed changes to index-based valuation. NOIA fully agrees that extending index-based valuation to arm's-length dispositions provides an opportunity to simplify royalty valuation and provide efficiencies for ONRR and lessees. This option would have the dual benefit of reducing reporting burdens for lessees and correspondingly reducing ONRR's audit burden. NOIA also fully supports modifying the applicable index from "highest" bidweek price to a "published index price." ONRR should not require that royalty be paid on a value most lessees cannot receive for their production. Therefore, the proposed change to a midpoint bidweek price makes the index price option reasonable for lessees. NOIA further fully supports the proposed modifications to the index-price transportation adjustments. The transportation adjustments in the existing rule, unchanged for years, are outdated and unsupported. Indeed, the existing adjustments available to OCS lessees are the same as ONRR provides for Indian lessees onshore that were adopted nearly 30 years ago, § 1206.172(d)(1)(iii), demonstrating that the current transportation adjustments for index-based valuation for leases in the high-cost OCS environment require updating.

There is a potential ambiguity, however, regarding proposed §§ 1206.141(g) and 1206.142(h) regarding retention of sales data if a lessee elects index-based valuation for either arm's-length or non-arm's-length dispositions. In a final rule, ONRR should clarify that a lessee must only retain its existing records as FOGRMA already requires, and need not make and retain a determination of what its royalty value would have been under the regulations but for the index option, which would entail lessees undertaking all the calculational cost and effort that the index option would eliminate.

NOIA also suggests that in a final rule ONRR should remove existing §§ 1206.141(c)(1)(ii) and 1206.142(d)(1)(ii) requiring that where a lessee "can transport gas to more than one index pricing point," the lessee must utilize "the highest of the published bidweek index prices to which your gas may flow for that respective production month, whether or not there are constraints for that production month." It is unreasonable for ONRR to base valuation on prices that are unattainable for a lessee due to physical constraints on gas movement to a particular sales point for a given production month. Removing the above-referenced provisions would eliminate this inequity.

Finally, because existing two-year index valuation elections may extend many months after a final rule becomes effective, ONRR should provide in the final rule that lessees may make new elections as to reporting and paying royalties for non-arm's-length dispositions of unprocessed gas, residue gas, and gas plant products using gross proceeds less allowances or an index-based valuation. ONRR also should provide that upon the effective date of a final rule, the changes to the index-based calculations would automatically apply for the duration of their existing election period.

C. Elimination of Default Provisions and Misconduct Definition

NOIA fully supports ONRR's proposal to remove the so-called "default provisions" in the 2016 Rule. Valuation in the first instance is the role of lessees, not ONRR. If a lessee fails to properly value its production in accordance with the regulations, the proper remedy is for the lessee to correct the value, not for the agency to instead unilaterally set the value. But under the existing default provisions, ONRR can bypass the lessee's valuation method and insert the agency's own preferred valuation if "for any reason" ONRR believes it cannot determine that the lessee properly paid royalty or properly applied an allowance in determining royalties owed for OCS oil or gas production. §§ 1206.104(c) (federal oil sales), 1206.110(f)(3) (federal oil transportation allowance), 1206.143(c)(3) (federal gas sales), 1206.152(g)(3) (federal gas transportation allowance), 1206.159(e)(3) (federal gas processing allowance). Removal of these provisions would properly restore long-standing certainty to the royalty valuation process for production from OCS oil and gas leases. ONRR also is correct that removing these provisions renders unnecessary existing §§ 1206.105 and 1206.144 on valuation under the default provisions.

NOIA also agrees with ONRR's proposal to eliminate the 2016 Rule's definition of "misconduct," one of the default provisions' triggers. NOIA agrees with ONRR that this existing misconduct definition is ill-defined and misguided. For consistency in a final rule, ONRR also should remove all other references to misconduct in part 1206, including §§ 1206.143(c)(1), 1206.143(c)(2), 1206.101(d)(2)(i), 1206.104(c)(1), 1206.110(f)(1), 1206.152(g)(1), and 1206.159(e)(1).

NOIA further urges ONRR in a final rule to remedy an issue related to default provisions, namely by removing the 2016 inflexible default 50 percent cap on transportation allowances (§§ 1206.110(d)(1) and 1206.152(e)(1)) and 66 2/3 percent cap on processing allowances (§ 1206.159(c)(2)). The 2016 Rule unjustifiably removed the ability of lessees to request higher limits where warranted by high actual transportation and processing costs. The burden of the fixed limitations falls disproportionately on OCS lessees because of the longer distances associated with moving the oil and gas production to market. To allow for greater expansion of domestic energy production, especially from the OCS, ONRR must have the ability to afford full transportation and processing allowances where appropriate without fixed default limits.

Fixed percentage caps are especially ill-suited to deepwater projects because the relationship between transportation or processing cost and commodity value can vary materially with distance, throughput, reservoir decline, facility utilization, and commodity prices. An allowance that falls below actual, reasonable, and documented costs can produce a royalty value that exceeds the value realized after the lessee moves or processes the production. ONRR should therefore restore the workable process through which a lessee may obtain an allowance above the stated percentage limits when actual costs warrant that result. A final rule should identify the supporting information ONRR expects, provide for timely review, and permit appropriate true-up activities following agency review so that administrative delay does not itself deny an otherwise valid allowance.

D. Clarifying Marketable Condition

NOIA recommends that ONRR discard its proposed change to § 1206.146(c) on determining marketable condition for gas. While NOIA supports ONRR's effort to clarify marketable condition, the proposed change largely would not do so, and even could complicate the concept further.

ONRR proposes that if the gas or gas plant products are delivered to a mainline pipeline, the quality specifications set by the pipeline operator would determine the standards for marketable condition. If delivery is by a method other than mainline pipeline, marketable condition would be determined by the standards of the receiving transporter or purchaser. If the gas is never processed and the lessee can demonstrate that a market exists at another location, the lessee may use the quality specifications required at that alternative delivery point. The Proposed Rule thus effectively would allow every pipeline operator, transporter, or purchaser to establish "marketable condition" for its system however it sees fit. Leaving this existing regulation unaltered, and further addressing this issue outside of this proposed rulemaking, would be preferable.

E. Non-Arm's Length Allowances

NOIA additionally supports ONRR's proposal to allow non-arm's-length transportation or processing allowances through depreciation schedules in circumstances where a lessee acquires a depreciable asset but does not have the original cost records or the original depreciation schedules do not comply with ONRR's regulations. §§ 1206.112(i)(4)(i) (oil transportation), 1206.154(i)(4)(i) (gas transportation), 1206.161(h)(4)(i) (gas processing).

If ONRR denies any allowance for depreciation and a return on undepreciated capital investment in a circumstance where source cost documentation is not available, even for reasons beyond the lessee's control, it improperly results in an inappropriately high royalty value. ONRR's proposed acceptance of alternate depreciation schedules as secondary documentation would address this problem. It also would mirror other federal agency practices, including the Internal Revenue Service. *See, e.g.*, *Singh v. C.I.R.*, No. 6093-16, 2018 WL 4037418, at *7 n.3 (Aug. 22, 2018); *Boyd v. C.I.R.*, 122 T.C. 305, 320 (April 27, 2004).

In a final rule, ONRR should make a change to the regulatory text for this section. It should eliminate the requirement that the lessee propose an alternate depreciation schedule and obtain advance approval from ONRR *before* using the depreciation as part of an allowance in reporting and paying its royalties. An ONRR review and approval process has the potential to unduly delay the opportunity for a lessee to take allowances to which it is entitled. ONRR therefore should amend the final rule to provide that if a lessee proposes a depreciation schedule to ONRR, the lessee may begin using the proposed schedule pending ONRR review.

ONRR also proposes to allow lessees to establish an alternative in-service date to recoup the full value of the royalty share of capital costs as part of a non-arm's-length transportation or processing allowance. § 1206.112(i)(1)(i) (oil transportation); § 1206.154(i)(1)(i) (gas transportation); § 1206.161(h)(1)(i) (gas processing). NOIA supports this provision. However, like for the provisions relating to alternate depreciation schedules, ONRR should remove the requirement to seek advance approval from ONRR and allow the lessee to immediately implement its alternative in-service date in its royalty reporting pending ONRR's review.

NOIA generally supports ONRR's proposed several new definitions for § 1206.20 related to non-arm's-length allowance calculations to implement the changes for acquired assets and the alternative in-service date. However, the proposed definition of "life of the reserve" would require that the estimate be "based on a report from an unaffiliated or independent expert." This requirement would impose unreasonable and unnecessary costs for lessees to seek external expert reports for every estimate. ONRR therefore should remove this requirement in a final rule and review the lessee's estimates on audit.

NOIA supports ONRR's proposed amendments to §§ 1206.112(i)(2)(iii) (oil transportation), 1206.154(i)(2)(iii) (gas transportation), and 1206.161(h)(2)(iii) (gas processing) to allow lessees to select a depreciation method at different asset levels and groupings. They would provide lessees the flexibility to respond to their particular circumstances.

Finally, ONRR proposes to recategorize maintenance expenses as an allowable operating expense. §§ 1206.112(f)(9) (oil transportation), 1206.154(f)(9) (gas transportation), 1206.161(e)(9) (gas processing). NOIA supports this change because it would better align with standard accounting practices.

F. Proposed Changes to ONRR Director Appeals Standards

NOIA recommends that ONRR omit from a final rule its proposed change to § 1290.105 for ONRR Director appeals. This change, without clear timelines, would not meaningfully alter the existing review standard for appeals. ONRR should instead make efforts to expedite the current appeal process that takes too long. The Interior Board of Land Appeals rarely has sufficient time to review an ONRR Director decision before expiration of the 33-month period to issue a final departmental decision in appeals of ONRR royalty orders.

G. Other ONRR Requests for Comment

At the end of the preamble ONRR lists approximately 30 items on which it requests public comment. Many of these topics already are addressed in NOIA's comments above on individual sections of the Proposed Rule. NOIA here provides additional responses:

1. What ONRR should do to determine value in situations where the regulations do not result in a reasonable valuation method or are inapplicable.

   Response: ONRR's Proposed Rule should reduce the occurrence of unreasonable valuations and circumstances where valuation methods are inapplicable. If those circumstances occur, ONRR should work with the lessee to agree to a valuation method for its production.

2. Quantifying the administrative burden or savings that a lessee with arm's-length sales would realize if using the index-based valuation option in place of reporting such dispositions using gross proceeds.

Response: Expanding the optional index-based valuation method to arm's-length dispositions should reduce recurring work associated with transaction-level gross-proceeds analysis, contract review, allocation of price adjustments, reconciliation of sales records, maintenance of valuation workpapers, and audit support. It should also reduce the volume and complexity of records ONRR must test when auditing royalty valuation. Actual savings will vary with the number of properties, contracts, products, affiliates, and reporting systems involved.

3. Compliance Date—ONRR seeks public comment on:

• Whether it should include a separate compliance date for reporting and payment in the final rule.

• If ONRR incorporates a separate compliance date, should the compliance date extend six months from the effective date or sooner?

Response: NOIA supports a separate compliance date no earlier than six months after the effective date of a final rule. This transition period is necessary to lessees to interpret the final requirements, revise written procedures and internal controls, configure and test royalty reporting systems, train personnel, coordinate with purchasers and service providers, and validate opening calculations. ONRR should permit voluntary early adoption where practicable and should provide that the revised index calculations apply automatically to existing index elections as described above. ONRR should also publish implementation guidance sufficiently in advance of the compliance date and allow reasonable corrected reporting during the transition where a lessee acts in good faith to implement the new requirements.

Conclusion

Thank you for the opportunity to provide comments on the Proposed Rule. NOIA and its members support the proposed revisions, and we urge ONRR to promptly finalize the rule. NOIA and its members stand ready to work with ONRR, the Department, and the Administration to advance our common objective of energy dominance. Please contact Erik Milito (milito@noia.org) with any follow-up questions or to set up a meeting.

Very respectfully,

Erik Milito
President, NOIA