

GreenLatinos
Hispanic Access Foundation

January 30, 2023

US Department of Interior, Director (630)
Bureau of Land Management
1849 C St NW, Room 5646
Washington, DC 20240

Dear U.S. Bureau of Land Management Director Tracy Stone-Manning:

Re: Waste Prevention, Production Subject to Royalties, and Resource Conservation (Docket BLM-2022-0003-0001)

On behalf of the members of GreenLatinos and Hispanic Access Federation, we are writing to strongly urge BLM to adopt regulations that eliminates natural gas waste from venting and flaring at oil and gas operations on public lands. Hispanics and Latines deserve to live in economically vibrant communities with responsibly managed natural resources and a clean environment. A BLM rule that adopts clear measures to eliminate waste from venting and flaring can ensure a fair return to taxpayers and communities in the West and help protect those living in regions most greatly impacted by energy extraction and development.

While our communities will most benefit from the eventual transition off fossil fuels altogether, while there is active oil and gas on public lands, we must address the problem of wasted gas to minimize harm to our communities. One such harm can be in terms of diminished economic benefits. For states where oil and gas production occurs on public lands, royalties from these activities are an important and sizable source of revenue to fund education, hospitals, and other forms of critical infrastructure. Various taxes collected on natural gas produced within state borders provide further revenue to annual state budgets. However, since both royalties and taxes are assessed at point-of-sale, natural gas wasted from venting, flaring, or leaks do not contribute to overall sales volume and results in lost funding for states. According to a recent economic analysis commissioned by the Environmental Defense Fund and Taxpayers for Common Sense, nearly \$64 million in royalties was lost due to natural gas waste on federal and tribal lands, one-third of which would have gone directly to states.¹

Lost state revenue especially affects Hispanic and Latine communities in states with oil and gas production on public lands. New Mexico, the state with the highest percentage of Hispanics and Latines in the nation,² is also the state with the largest volume of wasted gas at approximately 63 billion cubic feet in 2019.¹ This is equivalent to \$26 million in missed state revenue – \$12 million from royalties and \$14 million from taxes – that could have been used to improve teacher salaries, classroom materials, and overall quality of education for New Mexico's children. And communities pay that cost every single year. Reigning in natural gas waste by requiring the oil and gas industry capture and sell this commodity has a direct and immediate influence on the continued success of Hispanic and Latine communities.

¹ <https://www.edf.org/media/new-study-quantifies-natural-gas-wasted-us-public-and-tribal-lands>

² <https://www.statista.com/statistics/259865/percentage-of-hispanic-population-in-the-us-by-state/>

Another critical reason for BLM to adopt a strong rule to cut natural gas waste are the potential health co-benefits. Methane, the primary component of natural gas, is a dangerous air pollutant and a precursor to ground-level ozone and smog, which damage the lungs and heart; cause coughing and sore throat; and worsen conditions such as asthma, emphysema, and bronchitis. Hispanic and Latine children are more likely to have asthma.³ They are also twice as likely to die from an asthma attack.⁴ Children and outdoor workers, who are disproportionately Hispanic and Latine, are more likely to be exposed to air pollution and thus at a higher risk for developing health problems. Hispanic and Latines are also more likely to live in polluted neighborhoods, with the CDC estimating that 48 percent of all Hispanics and Latines live in counties that frequently violate federal ground-level ozone standards.⁵ Cleaning up natural gas waste will not only mitigate these health concerns, but also reduce toxic chemicals emitted alongside methane that can cause cancer, developmental problems, and other illnesses.

We want to ensure that hardworking Hispanics and Latines have access to their fair share of returns and the health co-benefits, so that they can create prosperous and thriving communities; that children can attend good schools with resources to help them learn, grow, and succeed; and that families can live in clean environments without worrying about their health or safety. The venting, flaring, and leaking of gas is wasteful, unnecessary, and undermines all these fundamental values. This is why BLM should move beyond the royalty-focused approach of the current draft. BLM must also adopt a strong natural gas waste rule that eliminates waste from venting and flaring by limiting exceptions for safety and maintenance activities. Strong rules to cut waste will protect taxpayers as well as the health and future of Hispanic and Latine communities.

Sincerely,

Irene Burga
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GreenLatinos

Shanna Edberg
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³ <https://jamanetwork.com/journals/jamapediatrics/article-abstract/2792664>

⁴ <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=60>

⁵ https://lulac.org/blog/The_Fight_for_Clean_Air/