

# GOVERNMENTAL AFFAIRS REPORT

## FEDERAL – Legislative

**H.R. 4776 – Standardizing Permitting and Expediting Economic Development (SPEED) Act.** On July 25, bipartisan permitting reform legislation was introduced by Rep. Bruce Westerman (R-AR) and Rep. Jared Golden (D-ME). The bill, [H.R. 4776](#), known as the Standardizing Permitting and Expediting Economic Development (SPEED) Act, will according to the bill sponsors, modernize the National Environmental Policy Act (NEPA) “to help streamline the permitting process and return the law to its intended purpose. The bill will shorten permitting timelines and reduce the frequency of frivolous litigation. This legislation will simplify the analysis required in NEPA documents, thereby easing the burden on agencies. The bill will also clarify when NEPA is triggered by clarifying the definition of ‘Major Federal Action.’ Lastly, the bill will establish judicial review limitations for NEPA claims, including a 150-day deadline for filing claims, a new standard of review and the elimination of procedural moves that stop projects from moving forward.” [Read more](#). A coalition of oil and gas associations, including IPAA, hailed the legislation in a July 30 letter to Chairman Westerman of the House Committee on Natural Resources. [Read the letter here](#).

**U.S. Congress in August Recess.** The U.S. Congress is currently in its annual August recess with lawmakers returning to Washington, DC on September 9, 2025. [Read more](#).

**Congressional Letter to EPA Administrator Regarding California UIC Applications.** On July 9, members of the California Republican congressional delegation delivered a letter to U.S. Environmental Protection Agency (EPA) Administrator Lee Zeldin notifying the Administrator that “There are currently 73 Underground Injection Control (UIC) applications for new or expanded projects under review by the

State of California. Not a single UIC application has been approved in the last two years, and some are as old as 8 years. These applications represent over 6,000 drilling permits not being obtained and utilized, causing millions of barrels of domestic crude to be unnecessarily shut-in and leading to the rapid increase of foreign imports into California's ports.” The representatives ask the EPA to notify California “to ensure it is not unduly impacting the ability of operators to produce domestic crude and natural gas.” [Read the letter here](#).

## FEDERAL – Regulatory

**BLM Oil and Gas APDs.** On August 1, the Bureau of Land Management (BLM) published a final rule, *Revision to Regulations Regarding Approval of Operations; Valid Period of Approved Application for Permit To Drill* ([90 Fed. Reg. 36120](#)), as required under the recently enacted [One Big Beautiful Bill Act](#). The rule updates regulations pertaining to the application for permit to drill (APD). The new rule “establishes a 4-year term for approved APDs” rather than the 3-year term for approved APDs established in 2024. The rule is effective August 1, 2025. [Read more](#).

**BLM Oil and Gas Available Land Regulations.** On August 1, the BLM published a final rule, *Revision to Regulations Regarding Onshore Oil and Gas Leasing; General* ([90 Fed. Reg. 36117](#)), as required under the recently enacted [One Big Beautiful Bill Act](#). The rule updates the definitions of “eligible” and “available” in reference to lands the BLM can lease for oil and gas development. The rule is effective August 1, 2025. [Read more](#).

**BLM Oil and Gas Leasing Expressions of Interest.** On August 1, the BLM published a final rule, *Revision to Regulations Regarding Competitive Leases;*

*Expression of Interest Process* ([90 Fed. Reg. 36118](#)), as required under the recently enacted [One Big Beautiful Bill Act](#). The rule amends the regulation of fees for expressions of interest. [Read more.](#)

**BLM Oil and Gas Leasing Stipulations and Information Notices.** On August 1, the BLM published a final rule, *Revision to Regulations Regarding Oil and Gas Leasing; Stipulations and Information Notices* ([90 Fed. Reg. 36114](#)), as required under the recently enacted [One Big Beautiful Bill Act](#). The rule requires the Interior Department/BLM “to make lands in an expression of interest (EOI) available for leasing within 18 months of receipt of an EOI, subject to enumerated conditions. It adds a new subparagraph requiring any leases issued under the MLA [Mineral Leasing Act] to be subject to the terms and conditions of an approved resource management plan (RMP) and prohibits the Secretary from including any stipulations or mitigation in a lease, unless such stipulations or mitigation are included in an approved RMP.” The rule also provides that “initiation of an amendment to an RMP will not prevent the Secretary from leasing land, provided the other requirements of the section have been met.” [Read more.](#)

**BLM Intermittent Energy Regulations for Solar and Wind Energy.** On August 1, the BLM published a final rule, *Revisions to the Regulations Regarding Intermittent Energy* ([90 Fed. Reg. 36111](#)), as required under the recently enacted [One Big Beautiful Bill Act](#). The rule updates “specific rent and capacity fees for rights-of-way authorizing solar and wind energy generation facilities on public lands.” The rule is effective August 1, 2025. [Read more.](#)

**BLM Oil and Gas Lease Sale – Nevada.** On August 4, the BLM announced it has “opened a 30-day public comment period to receive public input on plans to include 11 oil and gas parcels totaling 19,957 acres in a March 2026 lease sale in Nevada. The comment period ends Sept. 3, 2025.” [Read more.](#)

**BLM Oil and Gas Lease Sale – New Mexico; Oklahoma.** On August 4, the BLM New Mexico State Office “announced an oil and gas lease sale

scheduled for Nov. 6, 2025, to offer 21 oil and gas parcels totaling 8,843 acres in New Mexico and Oklahoma. The BLM completed scoping on these parcels in March 2025 and held a public comment period that closed in May 2025 on the parcels and the related environmental analysis. A 30-day public protest period to receive additional public input opened today and will close Sept. 3, 2025.” [Read more.](#)

**BLM Oil and Gas Lease Sale – New Mexico; Oklahoma.** On August 1, the BLM New Mexico State Office “opened a 30-day public comment period to receive public input on plans to include 32 oil and gas leases, totaling 20,479 acres in New Mexico and Oklahoma in a January 2026 sale. The comment period ends Sept. 2, 2025.” [Read more.](#)

**BLM Alaska National Petroleum Reserve Policy Rescissions.** On July 28, the BLM announced it “has rescinded three policy documents that sought to expand and intensify restrictions on special area management within the National Petroleum Reserve in Alaska.” Specifically, those Biden-era documents are: (1) A the request for information titled “Special Areas within the National Petroleum Reserve in Alaska” that published in the Federal Register in July 2024; (2) A report titled “Maximizing Protection in the National Petroleum Reserve – Alaska” published in January 2025; and (3) A BLM memorandum entitled “BLM Interim Management of Special Areas within the National Petroleum Reserve – Alaska” published in January 2025. According to the BLM, “These documents were developed without sufficient deference to statutory direction, economic realities or the voices of Alaskans, and threatened to unnecessarily restrict access to vital domestic energy resources.” [Read more.](#)

**EPA Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources.** On July 23, the EPA published an interim final rule and request for comments, *Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate*

*Review Final Rule* ([90 Fed. Reg. 35966](#)), that delays implementation of rulemaking regarding emissions from oil and gas sources. As provided by *The Hill*, “Under the interim final rule, companies will have 18 months before they need to install certain pollution controls.” Despite climate activist opposition to the delay, even Mahyar Sorour, director of the Sierra Club’s Beyond Fossil Fuels Policy, admitted that “Many oil and gas operators have already been complying with these requirements for nearly a year, while others are investing and planning ways to reduce methane pollution to meet the standards.” [Read more](#). Specifically, the rulemaking extends compliance deadlines under the [2024 Clean Air Act New Source Performance Standards and Emissions Guidelines \(OOOOb/c\)](#). As provided by law firm Holland & Hart, the delay provides for an “18-month extension for meeting requirements on emission control devices, equipment leaks, storage vessels, and flaring systems; [and a] 120-day extension for starting continuous monitoring of the flare’s vent gas net heating value (used to assess flare efficiency). Additionally, “States now have 18 more months (beyond the March 2026 deadline) to develop and submit their methane emissions plans for existing sources, based on the 2024 Emissions Guidelines;” and regarding the Super Emitter Program, there is an 18-month delay, “which allows third parties to report major methane leaks using EPA-approved remote sensing. EPA will also delay reviewing technology approval requests for that program during this time.” The public comment period is open through September 2, 2025. [Read more](#).

#### **EPA Oil and Gas Methane Rule Reporting Deadline.**

On July 25, the “Domestic Energy Producers Alliance (DEPA) and the Independent Petroleum Association of America (IPAA) jointly submitted a formal request to the Environmental Protection Agency (EPA), urging an immediate extension of the August 5, 2025, compliance deadline for the Methane Rule’s annual reporting requirement. The letter, addressed to EPA Administrator Lee Zeldin and Deputy Administrator David Fotouhi, called on the Agency to issue either a direct final rule or a Federal Register notice to extend the reporting deadline by one year. The request comes as the EPA itself has announced its reconsideration of the rule—part of a broader reassessment of policies affecting the oil

and natural gas sector.” [Read the letter here](#). The letter notes that “the process of collecting the data and preparing these reports is highly onerous and resource-intensive, imposing significant burdens on American energy producers. As the rule is under reconsideration, enforcement of the associated compliance deadlines is inconsistent with the President’s policies for achieving Energy Dominance, particularly when the EPA is reconsidering the Methane Rule, a process whose results might ultimately render the onerous requirement moot.” [Read more](#). For further details about the EPA rule (finalized in 2024 under the Biden administration), [Read more](#).

#### **EPA Endangerment Finding on Greenhouse Gas Emissions.**

On July 29, EPA Administrator Lee Zeldin announced the EPA’s intention “to rescind the 2009 Endangerment Finding, which has been used to justify over \$1 trillion in regulations, including the Biden-Harris Administration’s electric vehicle (EV) mandate. If finalized, the proposal would repeal all resulting greenhouse gas emissions regulations for motor vehicles and engines, thereby reinstating consumer choice and giving Americans the ability to purchase a safe and affordable car for their family while decreasing the cost of living on all products that trucks deliver.” [Read more](#). According to the EPA, “The Endangerment Finding is the legal prerequisite used by the Obama and Biden Administrations to regulate emissions from new motor vehicles and new motor vehicle engines. Absent this finding, EPA would lack statutory authority under Section 202(a) of the Clean Air Act (CAA) to prescribe standards for greenhouse gas emissions. This proposal, if finalized, is expected to save Americans \$54 billion in costs annually through the repeal of all greenhouse gas standards, including the Biden EPA’s electric vehicle mandate, under conservative economic forecasts. If finalized, this proposal would remove all greenhouse gas standards for light-, medium- and heavy-duty vehicles and heavy-duty engines, starting with EPA’s first greenhouse gas set in 2010 for light-duty vehicles and those set in 2011 for medium-duty vehicles and heavy-duty vehicles and engines—which includes off-cycle credits like the much hated start-stop feature on most new cars.” [Read more](#).

**Interior Department Office of Natural Resources Revenue Information Collection.** On August 6, the Interior Department's Office of Natural Resources Revenue (ONRR) published a notice of information collection, *Agency Information Collection Activities: Solid Minerals and Geothermal Collections* ([90 Fed. Reg. 37880](#)), regarding ONRR seeking "renewed authority to collect information necessary to report the production and royalties on solid minerals and geothermal resources from Federal and Indian lands." Public comments are due by September 5, 2025. [Read more.](#)

**Interior Department Office of Natural Resources Revenue Information Collection.** On July 31, the Interior Department's Office of Natural Resources Revenue (ONRR) published a notice of information collection, *Agency Information Collection Activities: Royalty and Production Reporting* ([90 Fed. Reg. 36068](#)), seeking information from the public regarding ONRR's "renewed authority to collect information used to verify, audit, collect, and disburse royalty owed on oil, gas, and geothermal resources produced from Federal and Indian lands." Public comments are due by September 2, 2025. [Read more.](#)

**U.S. Department of Energy Greenhouse Gas Emissions Report.** On July 29, the U.S. Department of Energy (DOE) announced it published a report entitled [A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate](#), that evaluates "existing peer-reviewed literature and government data on climate impacts of Greenhouse Gas (GHG) Emissions and providing a critical assessment of the conventional narrative on climate change. Among the key findings, the report concludes that carbon dioxide (CO<sub>2</sub>) -induced warming appears to be less damaging economically than commonly believed, and that aggressive mitigation strategies could be more harmful than beneficial. Additionally, the report finds that U.S. policy actions are expected to have undetectably small direct impacts on the global climate and any effects will emerge only with long delays." [Read more.](#) In response to the report, the Domestic Energy Producers Alliance said, "The Department of Energy's Climate Assessment confirms what we've been saying for years: it's time to reassess

outdated regulations like the Endangerment Finding that were built on incomplete science and continue to hinder domestic energy development." [Read more.](#)

## **STATE – Legislative**

**For all 900+ bills AAPL is currently monitoring and tracking for members, please see the continuously updated member-exclusive AAPL Governmental Affairs Bill Tracking Summary spreadsheet**, available through the AAPLConnect LANDNEWS and Governmental Affairs Network member forums [here](#) or on the AAPL website [here](#).

## **STATE – Regulatory**

**California Geologic Energy Management Division SB 1137 Implementing Regulations.** On August 1, the California Department of Conservation's California Geologic Energy Management Division (CalGEM) [released its Notice of Proposed Rulemaking](#) for the permanent implementation of [SB 1137](#), a well setback bill enacted in 2022 that "created health protection zones within a 3,200-foot area around 'sensitive receptors.'" The public comment period is open through September 18, 2025. The Department will also hold a public hearing on September 17, 2025. For information on submitting public comments and attending the hearing, [Read more.](#) You may also [access the proposed rulemaking here](#). For further details on CalGEM regulation of oil and gas operations within health protection zones pursuant to SB 1137, [Read more.](#)

**Native Oil Producers and Employees of California Launches New Website.** On July 28, the California Independent Petroleum Association reported that the Native Oil Producers and Employees of California (NOPEC) has launched a new website "to defend California oil producers, workers, and communities from unconstitutional state overreach and unlawful anti-oil regulations." As provided by NOPEC, they are "a 501(c)(6) non-profit organization founded to defend the rights of homegrown energy producers and California oil workers by taking legal action to



overcome illegal government policies that curtail in-state production and make California more dependent on foreign imports into our crowded ports.” [Read more.](#)

#### **California State Lands Commission Leasing.**

The California State Lands Commission (CSLC) “is inviting Letters of Intent (LOIs) from qualified renewable energy developers interested in leasing state lands for the development of wind, solar, battery storage, or biomass energy projects. This opportunity supports California’s clean energy goals by activating underutilized state lands for responsible, utility-scale energy development.” All offers are due by September 30, 2025. [Read more.](#)

### **STATE – Judicial**

**North Dakota Industrial Commission Authority; Saltwater Gathering Costs.** On July 3, in [Equinor Energy, LP v. North Dakota Industrial Commission](#) (Case No. 2025 ND 126), the North Dakota Supreme Court “held that saltwater gathering is a post-production cost — and that the NDIC lacks authority to adjudicate disputes over such costs between private parties.” The case arose over a dispute regarding saltwater gathering costs in which one of the parties petitioned the NDIC to determine the proper value of those costs. Equinor appealed to the North Dakota Supreme Court claiming “(1) the NDIC did not have jurisdiction to adjudicate a private contract for saltwater gathering costs; and (2) the NDIC erred in concluding that the costs Equinor assessed Versa for saltwater gathering services were improper.” Here, the court held that the NDIC did not have authority to adjudicate this dispute. “This is because jurisdiction to resolve disputes between private parties regarding these costs exceeds its statutory authority to regulate produced water.” As noted by law firm Oliva Gibbs, this case “reinforces a foundational principle of administrative law: broad regulatory power does not imply the power to adjudicate private disputes. In North Dakota, this limitation now clearly includes disputes over saltwater gathering and disposal costs. Going forward, operators and non-operators should ensure their

agreements expressly allocate responsibility for post-production costs, including saltwater gathering, to avoid uncertainty and jurisdictional challenges.”

[Read more.](#)

#### **Oil and Gas Agreements; Business Court**

**Jurisdiction – Texas.** Recently, in [Slant Operating, LLC v. Octane Energy, LLC](#) (Case No. 24-BC08A-0002), the Texas Business Court (Eighth Division – Fort Worth) interpreted “the statutory definition of ‘qualified transaction’ in the context of an agreement between oil and gas operators” and held “that the agreement met the statutory requirements and that the court had jurisdiction over the parties’ dispute.” The case “arose from a dispute over a letter agreement in which each party agreed to a reciprocal waiver of objection of the other’s ‘off-lease penetration point’ permit applications.” A disagreement arose over whether the business court had jurisdiction over the matter in dispute. The court concluded that the matter met the monetary threshold and other requirements to be heard in the business court. [Read more.](#)

### **INDUSTRY NEWS FLASH**

#### **► Energy Transfer to expand Permian natural gas pipeline through Arizona and New Mexico.**

On August 6, Energy Transfer announced “the expansion of its Transwestern Pipeline to increase the supply of natural gas to markets throughout Arizona and New Mexico from Energy Transfer’s premier asset base in the prolific Permian Basin.” The expansion consists of 516 miles of pipeline with capacity for 1.5 billion cubic feet per day (Bcf/d). [Read more.](#)

