

# GOVERNMENTAL AFFAIRS REPORT

## **Highlights At-A-Glance**

## FEDERAL – Legislative

H.R. 8749 – Protecting the Permian Basin Act of

**2022.** On August 26, Rep. August Pfluger (R-TX) introduced <u>H.R. 8749</u>, known as the Protecting the Permian Basin Act of 2022. The bill would repeal the new methane emissions charge imposed on oil and gas producers that was included in the recently enacted Inflation Reduction Act of 2022. (Access the comprehensive AAPL Fact Sheet here.) Rep. Pfluger – who represents constituents in the Permian Basin – describes his legislation as "a bill to strike down the Democrats' latest attack on the oil and gas industry." The bill, however, has little chance of advancing in the Democrat-controlled Congress but may be considered if Republicans retake the House of Representatives this November. <u>Read more</u>.

#### H.R. 8678 – American Energy is Global Security

Act of 2022. On August 24, official bill text was made available for H.R. 8678, known as the American Energy is Global Security Act of 2022. Sponsored by Rep. Claudia Tenney (R-NY), the bill would "direct the Secretary of Energy to restrict certain grants to any State that has in effect a law prohibiting hydraulic fracturing within such State." In effect, the bill would incentivize states like New York to repeal the statewide ban on hydraulic fracturing by withholding funding from certain federal grant programs. "New York State is sitting on top of natural gas formations that could power our state with clean energy for decades," said Rep. Tenney. "Americans need clean energy at lower costs now and delivering on this commitment can and should start right here in New York." Read more.

## FEDERAL – Regulatory

BLM Bears Ears National Monument - Utah. On

August 30, the Bureau of Land Management (BLM) published a *Notice of Intent To Prepare a Resource Management Plan for the Bears Ears National Monument in Utah and an Associated Environmental Impact Statement* (87 Fed. Reg. 52992), that announces the BLM intends to revise a resource management plan with an associated environmental impact statement for the Bears Ears National Monument and by this notice announces the beginning of the scoping period to solicit public comments and identify issues, provide the planning criteria for public review, and issue a call for nominations for areas of critical environmental concern on lands managed by the BLM. The public comment period is open through October 31, 2022. <u>Read more</u>.

Interior Department Well Plugging. On August 25, the U.S. Department of the Interior "announced it has awarded an initial \$560 million from President Biden's Bipartisan Infrastructure Law to 24 states to begin work to plug, cap and reclaim orphaned oil and gas wells." According to the Interior Department, "eligible states have indicated that there are over 10,000 high-priority well sites across the country ready for immediate remediation efforts, with many more lined up for future action." The bipartisan infrastructure bill enacted late last year included a \$4.7 billion investment to plug orphaned wells. To date, the Interior Department announced that Ohio, Michigan, Louisiana, Kentucky, Illinois, and Arizona have received those funds. Read more.

**Monuments; Public Lands Protections – Colorado.** On August 25, Colorado Democrats delivered a letter to President Biden calling on his administration to designate certain areas in Colorado as national monuments in order to protect them from oil and gas resource development. The plea comes after a bill sponsored by Sen. Michael Bennet (D-CO) failed to advance out of committee in the Senate. That bill, <u>S. 173</u>, known as the Colorado Outdoor Recreation and Economy (CORE) Act, would have protected areas within the state from drilling. The letter writers told the President, "We will continue our fight to pass the CORE Act to deliver permanent conservation for the areas featured in the legislation but ask for your help in the interim to offer administrative protections modeled after the bill." <u>Read more</u>.

**EPA Petition Seeking Ban on Natural Gas** 

Appliances. On August 23, a number of environmental groups submitted a petition to the U.S. Environmental Protection Agency (EPA) to request the EPA issue rulemaking that would ban new natural gas-powered heating appliances in homes and commercial buildings. In their petition, the groups largely focused on health impacts and specifically ask for regulatory updates that would prohibit new heating systems that emit nitrogen oxides, "which have been linked to negative respiratory outcomes and are also a precursor to smog, which can worsen lung conditions like asthma." The groups also seek to prevent any new oil-power heating, although natural gas is more widely used. The petition only applies to heating and does not seek to prevent the use of gas stoves. The EPA is not required to promulgate rulemaking based upon an outside petition and has not yet responded publicly to the groups' request. The natural gas industry has argued against the petition. "This proposal would impose undue burdens on consumers at every step of the process, including our most vulnerable communities," said the American Gas Association in a statement. Read more.

## FEDERAL – Judicial

**Offshore Lease Sales.** On August 30, the U.S. Court of Appeals for the D.C. Circuit ruled in *Gulf Restoration Network v. Haaland* (Case No. 20-5179) that "two Trump-era Interior Department oil leases in the Gulf of Mexico were unlawful." In the ruling, the court "found the department in 2018 leased more than 150 million acres for oil exploration without properly analyzing the risk under the National Environmental Policy Act. The lease sales, 250 and 251, were among 11 proposed by the department in its 2017 five-year plan." The decision reverses a lower court opinion, in that the Interior Department "arbitrarily relied on inadequate environmental analyses of the sales' effects and incorrect assumptions about the sufficiency of safety regulations, violating a bedrock environmental law." This ruling sends "the lease sales back to the Interior Department for reconsideration of their environmental harms." Read more.

Grand Staircase-Escalante National Monument: Bears Ears National Monument - Utah. On August 24, the state of Utah and two Utah counties filed a lawsuit against the Biden Administration alleging the president abused his authority and violated the law when he reestablished the boundaries of two Utah national monuments - the 1.8-million-acre Grand Staircase-Escalante National Monument and 1.35million-acre Bears Ears National Monument - under the Monuments & Antiquities Act. According to the complaint in Garfield County v. Biden (Case No. 4:22cv-00059-DN), the monuments, which are together twice the size of Delaware, are too large to be considered antiquities under the law. The expanded boundaries have been used in the past to limit natural resources development in these areas managed by the Bureau of Land Management. The Biden administration has yet to respond to the complaint. Read more.

**BLM Leasing – Wyoming.** (Update to 7/11/22 Report) On August 31, Wyoming Gov. Mark Gordon (R) announced that his state will be filing a motion to intervene in litigation regarding Bureau of Land Management oil and gas leasing in Wyoming. Read more. As previously reported, on June 29, two environmental groups attempted to stop the June onshore federal lease sales, particularly in Wyoming. In The Wilderness Society v. Haaland (Case No. 1:22cv-01871), the plaintiffs "filed suit over the Biden administration's decision to offer 123 parcels covering nearly 120,000 acres (approximately 188 square miles) of federal land for oil and gas drilling." The groups claimed that "The Bureau of Land Management (BLM) is moving forward with the sale despite acknowledging that greenhouse gas pollution from development of the leases could result in billions

of dollars in social and environmental harm – the equivalent of adding hundreds of thousands of cars to the road each year. The lease sale will also commit these public lands to oil and gas drilling before BLM completes reforms to the federal oil and gas leasing program that the agency has recognized are needed." Specifically, the complaint argued "that the Wyoming lease sale violates the National Environmental Policy Act (NEPA) and Administrative Procedure Act by locking in extensive oil and gas development rights without grappling with the enormous climate change costs of doing so, and without addressing protection of groundwater and wildlife." The complaint, however, was unsuccessful in halting the lease sale. Read more.

#### STATE – Legislative

**Greenhouse Gas Emissions Disclosure and** Reporting - California. On August 31, SB 260, known as the Climate Corporate Accountability Act, died in the Assembly upon session adjournment. The bill passed the Senate in January. Sponsored by multiple Democrat senators, the bill would have required large private and public corporations to disclose and report their greenhouse gas emissions. As reported by Bloomberg Law, "The measure would have gone farther than the Securities and Exchange Commission's proposed climate disclosure rule, which only applies to publicly traded companies and contains certain carve-outs for supply-chain emissions reporting. A full reporting from any large public or private corporation doing business in the state of all emissions would have been required, including supplychain-known as Scope 3-emissions. The reports would be made to a third-party emissions registry. Trade groups led by the California Chamber of Commerce opposed the Climate Corporate Accountability Act, arguing that Scope 3 emissions are impossible to report accurately and completely." Read more.

**Carbon Sequestration and Capture – California.** On August 31, SB 905 passed the legislature and is to be transmitted to Gov. Gavin Newsom (D). According to the Senate bill analysis, "This bill establishes a framework for capture, utilization, and storage of compressed carbon dioxide (CO2), a greenhouse gas (GHG). The bill complements existing policies to meet California's long-term climate change goals." The bill requires the state Air Resources Board "to adopt a unified permit application for CO2 projects, including measures to minimize specified environmental and seismic impacts, as well as monitoring and reporting of seismic activity and air pollution." <u>Read more</u>.

Carbon Sequestration – California. (Update to 5/31/22 Report) On August 31, SB 1101 died in the Assembly at session adjournment. The bill passed the Senate in May. Sponsored by Sen. Anna Caballero (D), this bill would have required "the state Air Resources Board, in consultation with the Geologic Carbon Sequestration Group, which the bill would establish in the California Geological Survey, to establish a Carbon Capture, Utilization, and Storage (CCUS) Program, as provided, for developing the commercial application of carbon capture, utilization, and storage technologies to reduce carbon dioxide emissions from new and existing facilities with a primary objective of deploying projects that will accelerate, to the maximum extent practicable, the development, deployment, and commercialization of advanced new technologies to capture and sequester carbon dioxide emissions from industrial and commercial facilities. The bill would require the state board, by an unspecified date, to submit a report to the Legislature and to the budget and relevant policy committees of the Legislature regarding CCUS projects approved under the program on or before an unspecified date." Read more.

#### Setbacks; Health Protection Zones - California.

On August 31, SB 1137 passed the legislature and is to be transmitted to Gov. Gavin Newsom (D). Sponsored by Sen. Monique Limón (D), the statewide setback bill prohibits the Geologic Energy Management Division from approving any notice of intention within a health protection zone, as defined, except for under specified circumstances. The bill also requires all oil or gas production facilities or wells with a wellhead within a health protection zone to comply with health, safety, and environmental requirements, as provided, and comply with specified community communication and water sampling requirements. The bill defines "health protection zone" as the area within 3,200 feet of a sensitive receptor, which is defined "as a residence, education resource, community resource, health care facility, dormitory, or any building open to the public." The California Independent Petroleum Association came out strongly against this bill - which was quickly pushed through in the last three days of the session at the insistence of Gov. Newsom saying, "A 3,200-foot setback is an arbitrary number supported by zero data and zero science. It's a number that extremists fed to Newsom for a purely political reason: to shut down the California oil industry. California already has setbacks. California's local counties and cities have developed scientifically based setbacks throughout the state, working with interested parties and the oil industry to develop thoughtful setbacks. Yet Governor Newsom is pressing an 11th-hour one-size-fits-all statewide setback that would undo decades of thoughtful policymaking on the local level." Read more.

#### Orphaned and Abandoned Wells – California.

(Update to 4/11/22 Report) On August 31, SB 1295 passed the legislature and is to be transmitted to Gov. Gavin Newsom (D). Sponsored by Sen. Monique Limón (D), the bill relates to hazardous or deserted wells, and provides "that all work undertaken or paid for by the Geologic Energy Management Division (CalGEM) using outside contractors is a public work and requires prevailing wages to be paid, requires the California Workforce Development Board to develop and implement the Oil and Gas Well Capping Pilot initiative, and increases the amount that CalGEM can potentially expend in the next fiscal years to plugand-abandon wells, among other things Assembly Amendments require the California Workforce Development Board to develop and implement the Oil and Gas Well Capping Pilot Initiative, revise the labor provisions, extend certain deadlines, remove the sunset on the CalGEM idle well report, and revise the calculation formula for the amount to be spent on plugging-and-abandoning wells annually, among other things." Read more.

Enhanced Oil Recovery; Injection Wells – California. On August 30, SB 1314 passed the legislature and is to be transmitted to Gov. Gavin Newsom (D). Sponsored by Sen. Monique Limón (D), the bill prohibits an operator from injecting a concentrated carbon dioxide fluid produced by a carbon dioxide capture project or a carbon dioxide capture and sequestration project into a Class II injection well for purposes of enhanced oil recovery, including the facilitation of enhanced oil recovery from another well. <u>Read more</u>.

#### Budget Bill Climate Provisions – California.

On August 31, AB 209 passed the legislature and is to be transmitted to Gov. Gavin Newsom (D). Sponsored by Asm. Phil Tang (D), the bill is the omnibus energy budget trailer bill and contains provisions necessary to implement the state's 2022 Budget Act and includes various energy and climate change provisions. Specifically, the bill includes greenhouse gas emissions reduction incentives; offshore wind development provisions; provides funding for renewable energy projects and carbon capture pilots eligible for federal match funding; and prohibits operating fossil fuel resources in the Water Resources Strategic Reserve except during extreme events. <u>Read more</u>.

#### STATE – Regulatory

**BLM Oil and Gas Leasing and Development** Planning - California. (Update to 8/8/22 Report) On August 29, members of the California congressional delegation - including House Republican Leader Kevin McCarthy - delivered a letter to Gov. Gavin Newsom (D), opposing the recent settlement between the State of California and the Bureau of Land Management (BLM) which "places a federal moratorium on new oil and gas leases in Central California until BLM conducts a supplemental environmental review on the impacts of oil and gas drilling." The letter highlights "the detrimental economic impact of banning oil and gas production in the Central Valley" and asks that the settlement be rescinded and the state work "quickly with BLM to ensure production can begin soon." Read the letter

here. For background, on July 31, the BLM, state of California, and various environmental groups entered into a settlement agreement resolving litigation dating back to 2015. In Center for Biological Diversity v. U.S. Bureau of Land Management (Case No. 2:20-cv-00371-DSF), the litigants originally filed a complaint for declaratory and injunctive relief challenging the 2014 BLM Resource Management Plan (RMP) and 2012 BLM Final Environmental Impact Statement (EIS) for the Bakersfield Field Office, which identified approximately 400,000 acres of public lands and 1.2 million acres of federal mineral estate available for oil and gas leasing, alleging that the 2012 EIS failed to disclose and adequately analyze the environmental impacts of approving the 2014 RMP, including impacts from hydraulic fracturing in violation of the National Environmental Policy Act. The terms of the "settlement include a moratorium on new oil and gas leasing [in the area] while the BLM conducts a more thorough review. The agency specifically agreed to conduct a new supplemental environmental impact statement before holding any new lease sales. The California officials will also reserve the right to dispute or challenge the replacement statement." The settlement effectuates a reversal of a Trump-era decision that would have opened central California to new oil and gas drilling on public lands and will prohibit the federal government from leasing any of the land for drilling until the new environmental review is completed. Read more.

Kern County Approves Oil and Gas Permitting Revisions – California. On August 23, the Kern County Board of Supervisors <u>unanimously approved</u> <u>a series of changes</u> "intended to revive the county's embattled oil and gas permitting system. The board's action on idle oilfield equipment on farmland, fineparticulate emissions and a fund for drinking water systems constituted county government's response to a June court ruling that faulted aspects of Kern's longstanding efforts to streamline local oil permitting. Staff's plan now is to return to Kern County Superior Court on Sept. 28 to persuade Judge Gregory Pulskamp to declare its 7-year-old permitting system, which has been on hold since October, compliant with the California Environmental Quality Act." The Board vote came after a brief public hearing "at which industry backers said putting the permitting system back in place would support local jobs, economic activity and the county's ability to provide local services." <u>Read more</u>.

Four Corners Air Quality Group Meeting – New Mexico. On August 24, the New Mexico Environment Department Air Quality Bureau (AQB) announced that the Four Corners Air Quality Group will meet In-person in Farmington, N.M. on September 21 & 22, 2022 from 9 a.m. to 4 p.m. According to the AQB, the "focus of the meeting will be the air and climate challenges facing the region." For in-person attendance, the location will be San Juan College's School of Energy, Merrion Rooms A & B. 5301 College Blvd, Farmington, NM 87402. A virtual attendance option is also available. Read more.

Fossil Fuel Banking Ban - Texas. Following in the footsteps of West Virginia, as previously reported, Texas "is banning 10 large banks and 348 investment funds for allegedly boycotting fossil fuel-based energy companies critical to the state's economy." The blacklist, released August 24, includes many "banks that Texas put on notice earlier this year [that] went to great lengths to show that they are, in fact, investing tens of millions in the fossil fuel industry, but some failed to convince the state." According to Texas Comptroller of Public Accounts, Glenn Hegar, "The environmental, social and corporate governance (ESG) movement has produced an opaque and perverse system in which some financial companies no longer make decisions in the best interest of their shareholders or their clients, but instead use their financial clout to push a social and political agenda shrouded in secrecy. Our review focused on the boycott of energy companies, rather than a review of the entire ESG movement. This research uncovered a systemic lack of transparency that should concern every American regardless of political persuasion, especially the use of doublespeak by some financial institutions as they engage in anti-oil and gas rhetoric publicly yet present a much different story behind closed doors." Read more.

Railroad Commission Rulemaking - Texas. On August 31, the Texas Railroad Commission (RRC) announced it is accepting public comment on proposed amendments to 16 Texas Administrative Code (TAC) §3.65, relating to Critical Designation of Natural Gas Infrastructure. According to the RRC, "The proposed rule amendments simplify the rule language and process for designating certain natural gas facilities and entities critical during energy emergencies as specified in House Bill 3648 and Senate Bill 3 (87th Legislature, Regular Session). Specifically, "16 TAC §3.65(a) - Provide more certainty regarding the definition of 'energy emergency;' 16 TAC §3.65(b)(1) — Amend the list of critical gas suppliers; and 16 TAC §3.65(c), (e) and (f) — Revise requirements triggered by a critical gas supplier's inclusion on the electricity supply chain map produced by the Texas Electricity Supply Chain Security and Mapping Committee." To view the proposed rule amendments and submit comments online by 5 p.m. on Friday, October 7, 2022, Read more here. The RRC also adopted two rules in their August 30 meeting: (1) New §3.66, Weather Emergency Preparedness Standards and (2) Adopted amendments in Chapter 5 regarding Carbon Dioxide implement provisions from HB 1284 (2021) concerning the RRC's sole jurisdiction over carbon sequestration wells. Read more. Regarding the §3.66 rulemaking, the RRC said this is "the state's first weatherization rule for natural gas facilities to protect gas flow to power generators and ensure Texans have electricity during weather emergencies. The new Weather Emergency Preparedness Standards rule (Statewide Rule 3.66) implements provisions in Senate Bill 3, which was passed by the Texas Legislature and signed by Governor Abbott in 2021 following the Winter Storm Uri." Of the rulemaking, Todd Staples, President of the Texas Oil and Gas Association, said, "Natural gas was not the primary cause of problems. Any over-emphasis on weatherization of natural gas facilities is concerning because, regardless of the level of weatherization, during extreme weather we can expect these largely unmanned upstream production sites to lose 10% to 30% of daily production. These are field operations and not factory settings. Stopping production is a necessary option for environmental

and safety reasons, and flexibility must be allowed in rulemaking for operators to maintain safety." <u>Read more</u>. Regarding the amendments to 16 TAC §5.101, §5.102 and §§5.201 – 5.207, according to the RRC, "those implement changes giving RRC sole jurisdiction over carbon sequestration wells (jurisdiction previously shared with the Texas Commission on Environmental Quality) and reflect additional federal requirements to allow the RRC to apply for enforcement primacy for the federal Class VI Underground Injection Control (UIC) program." <u>Read more</u>.

### STATE – Judicial

Disposal Wells; Insurance Liability – Oklahoma. On June 14, in Crown Energy Co. v. Mid-Continent Casualty Co. (Case No. 116989), the Oklahoma Supreme Court ruled in favor of an operator regarding claims arising out of seismic activity allegedly caused by Crown's use of wastewater disposal wells in its oil and gas operations. In the case, Crown sued their insurer seeking declaratory judgment that two commercial general liability policies issued to Crown provided coverage for claims of property damage brought against Crown in a separate action. The insurer alleged there was no coverage under the policies because the seismic activity did not constitute an "occurrence" and that the claims fell within a pollution exclusion to the policies. The trial court granted summary judgment in favor of Crown. On appeal, the court also ruled in favor of Crown. Also ruling in Crown's favor, the Oklahoma Supreme Court found that the seismic activity did constitute an occurrence under the policies, and that the pollution exclusion did not bar coverage. Read more.

## **INDUSTRY NEWS FLASH**

► Former Vice President Pence decries attack on fossil fuels at Petroleum Association of Wyoming conference. "Former Vice President Mike Pence and both of Wyoming's U.S. Senators decried Democrats' energy policies and the actions of federal regulators" during the Petroleum Association of Wyoming annual Rockies Petroleum Conference. "Pence warned of a left-wing 'war on energy' intended to eradicate fossil fuels — which, he argued, 'belong to the American people,' not the U.S. government." <u>Read more</u>.

Strategic Petroleum Reserve hits historic lows. As reported on August 24 by the Independent Petroleum Association of America, the "U.S. Strategic Petroleum Reserve (SPR) hit historic lows this week as President Joe Biden continues to order a record release of barrels from the emergency stockpile. The SPR now sits at around 453 million barrels - the lowest level in 37 years. For perspective, the U.S. Energy Information Administration estimates that in 2021, the United States consumed an average of about 19.78 million barrels of petroleum per day. If oil and gas production were to halt completely, today's SPR would have just enough supply to fuel the United States for 22 days." This has raised concerns with hurricane season approaching and with it the potential for further drawdowns in the case of emergency. Read more.

Colorado Oil & Gas Association educates on energy issues at 34th Annual Energy Summit.

On August 22-24, the Colorado Oil & Gas Association held its 34th Annual Energy Summit in which speakers and attendees addressed energy policy issues and how to communicate those policies to the public. "The oil and gas industry needs to find a way to rise above the political divide and find a common ground," said attendee Paula Beasley, communications advisor for Chevron. <u>Read more</u>.

#### LEGISLATIVE SESSION OVERVIEW

#### **States in Session**



Session Notes: The U.S. Congress is in summer recess through September 6.

The following are in recess until the dates provided: **Michigan** (September 7), the **Pennsylvania** House (September 12), the **Ohio** House (September 14), the **Pennsylvania** Senate (September 19) and the **Ohio** Senate (September 21).

**North Carolina** was scheduled to adjourn on July 1, however, the <u>adjournment resolution</u> calls for the regular session to reconvene for mini sessions over the coming months. The most recent session occurred on August 23. The next session is scheduled for September 20.

**California** adjourned its legislative session on August 31.

**Missouri** Republican Gov. Mike Parson's scheduled special session has been delayed to coincide with the state's veto session beginning on September 14. According to a <u>press release</u>, the session will deal with income tax cuts and extending agriculture tax credit programs.

**Idaho** lawmakers concluded their special session on September 1 after passing the largest <u>tax cut</u> in state history and ensuring another \$410 million in further education funding, reports the <u>Boise State Public Radio</u>. <u>Read more about the tax cuts here</u>.

Signing Deadlines (by date): California Democratic Gov. Gavin Newsom has until September 30 to sign or veto legislation or it becomes law without signature. Alaska Republican Gov. Mike Dunleavy has 20 days from presentment, Sundays excluded, to act on legislation or it becomes law without signature. New York Democratic Gov. Kathy Hochul has 10 days from presentment, Sundays excepted, to act on legislation or it becomes law without signature. North Carolina Democratic Gov. Roy Cooper has 10 days from presentment to act on legislation or it becomes law without signature.

The following states are currently holding 2022 interim committee hearings: <u>Alabama</u>, <u>Alaska</u>, <u>Arizona</u>, <u>Arkansas</u>, <u>Colorado</u>, <u>Connecticut</u>, <u>Delaware</u>, <u>Hawaii</u>,



Georgia, Idaho, Illinois House and Senate, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Missouri House and Senate, Minnesota, Mississippi House and Senate, Montana, Nebraska, Nevada, New Hampshire House and Senate, New Mexico, North Dakota, Ohio, Oregon, Rhode Island, South Carolina House and Senate, South Dakota, Tennessee, Texas House and Senate, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin and Wyoming.

The following states are currently posting 2023 bill drafts, pre-files and interim studies: <u>Florida</u>, <u>Kentucky</u>, <u>Montana</u>, <u>Nevada</u>, <u>North Dakota</u>, <u>Utah</u>, <u>Virginia</u> and <u>Wyoming</u> ■

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