



March 8, 2023

Chairman Bruce Westerman
House Committee on Natural Resources
1329 Longworth House Office Building
Washington, DC 20515

Dear Chairman Westerman,

The Permian Basin Petroleum Association (“PBPA”) appreciates this opportunity to comment on the Transparency, Accountability, Permitting and Production of American Resources Act (“TAPP American Resources Act”) currently under consideration by the U.S. House of Representatives.

PBPA is the largest regional oil and gas association in the United States. We represent the men and women who work in the oil and gas industry in the Permian Basin of West Texas and southeastern New Mexico. The Permian Basin is the largest inland oil and gas reservoir and the largest oil and gas producing region in the world. PBPA consists of the largest producers and services providers as well as the smallest operators in the Permian Basin. Part of the PBPA’s mission is to promote environmentally conscious operations and sustainable economic profitability among all our members, large and small.

PBPA supports the TAPP American Resources Act. Revisions and updates included in the TAPP American Resources Act will provide transparency and effectiveness to a system that had become opaque with bureaucracy and objectivity. The natural resources produced, and needed, by America and her allies are to be valued for their economic, energy, strategic and national security value. It only makes sense that any cost-benefit analysis conducted at the federal level of producing natural resources should actually take into consideration the benefits to the economy, the human condition and to national security of that resource. The codification of previous administrative actions such as the Council of Environmental Quality rule will do just that.

The requirements for detailed reporting in the TAPP American Resources Act will provide a true statistical analysis of permitting in the United States, which our members greatly support. Further, requirements that actions such as remediation be taken into consideration when making a No Net Loss Determination for Rights-of-Ways is supportive of the conservation already taking place in the field. Throughout the Permian Basin non-native flora, such as Mesquite, are often removed through ground work in the field. Once reclamation begins, native grasses and other native vegetation is planted in their place. Not only does this restore the countryside to its native state, these native plants improve habitat for native fauna and help to reduce draught and soil degradation. These actions should absolutely be given the credit they are due.

Further, the proposed amendments to NEPA would work to greatly clarify previously ambiguous provisions and allow for the optimization of interagency coordination, which should result in more efficient, effective and timely environmental review by the federal government. Federal environmental review can greatly impact the development of natural resources not just on federal lands, but also on state owned and privately owned lands in the Permian Basin. Modern development techniques greatly reduce surface impact of operations, but have increased the utilization if not need for contiguous stretches of subsurface acreage in the production of hydrocarbons. This often means that federal acreage, state acreage and private acreage, which can be found bordering each other in a checkerboard like pattern in our region, is needed for the development of these resources in a more efficient and effective manner. Thus, when a federal environmental review slows down or limits operations on federal lands, even with proper permitting in place, this also impacts the development of state and privately held properties.

The TAPP American Resources Act will help make the environmental review process more efficient and effective, reducing delays in the execution of properly permitted actions on federal lands. This will result in benefits not just to the United States, but to the state of New Mexico as well as private property owners and those stakeholders engaging with each of these property owners to properly develop the fuel our nation and allies need.

Thank you again for the opportunity to provide our support for the TAPP American Resources Act.

Regards,



Ben Shepperd
President
Permian Basin Petroleum Association