



November 18, 2025

The Honorable Bruce Westerman
Chairman, House Committee on Natural Resources
United States House of Representatives
1324 Longworth House Office Building
Washington, DC 20515

Re: Continental Resources' Support for the Standardizing Permitting and Expediting Economic Development (SPEED) Act

Dear Chairman Westerman:

Continental Resources, Inc. ("Continental") is pleased to express our enthusiastic support for the Standardizing Permitting and Expediting Economic Development (SPEED) Act. This bipartisan legislation represents a critical and long-overdue reform to modernize the National Environmental Policy Act (NEPA) and restore balance to the federal permitting process.

ABOUT CONTINENTAL RESOURCES

Continental is one of America's largest independent oil and natural gas exploration and production companies and the largest privately held oil and gas producer in the United States. Our operations span North Dakota's Bakken formation, Oklahoma's SCOOP and STACK plays, Wyoming's Powder River Basin, and Texas's Permian Basin. Founded in 1967, we have been a pioneering force in America's energy renaissance, helping to unlock the nation's vast unconventional oil and gas resources through technological innovation and operational excellence. Our operations on federal, state, and private lands contribute significantly to American energy security, economic growth, and government revenues that fund critical public services.

THE SPEED ACT ADDRESSES REAL-WORLD OPERATIONAL CHALLENGES

Continental has direct experience with the compliance challenges that the SPEED Act seeks to address. In our decades of responsible federal land operations, we have witnessed how NEPA's evolution from a procedural statute into a litigation weapon has created unreasonable delays, driven up costs, and prevented America from building the energy infrastructure necessary to meet growing demand—including the massive electricity requirements of emerging technologies like AI development and data centers.

The SPEED Act correctly recognizes that NEPA should inform federal decision-making, not paralyze it. As the Supreme Court recently affirmed in *Seven County Infrastructure Coalition v. Eagle County*, NEPA is "a procedural cross-check, not a substantive roadblock."¹ The SPEED Act appropriately codifies this principle while providing the regulatory certainty that energy producers need to invest confidently in American energy development.

¹ *Seven Cnty. Infrastructure Coal. v. Eagle Cnty.*, No. 23-1192, 2025 WL 2302715, at *7 (U.S. May 29, 2025).

SPECIFIC PROVISIONS CONTINENTAL SUPPORTS

1. Limiting Review Scope to Direct Project Impacts

The SPEED Act's limitation on environmental review to effects directly linked to the proposed project addresses a significant source of delay and litigation abuse. Continental has witnessed how activist groups use speculative claims about indirect, downstream, or cumulative impacts to block or delay critical infrastructure. By focusing agency analysis on the project's actual environmental impacts, the SPEED Act will enable more efficient, accurate environmental reviews while maintaining appropriate environmental protection.

2. Judicial Review Reforms

The establishment of a 150-day filing deadline for legal challenges and a 180-day timeline for court decisions represents essential reform.² Continental strongly agrees that only parties who provided substantive comments during the public review period should have standing to challenge agency decisions.³ Equally important, the SPEED Act's limitation of judicial remedies to remanding cases back to agencies rather than allowing courts to vacate project approvals entirely and prevents minor procedural defects from destroying projects that have undergone years of environmental review and represents billions in capital investment. These provisions will reduce frivolous litigation that adds years to project timelines, even when lawsuits ultimately fail on the merits.

Continental has been in federal court for extended periods defending projects from activist groups who weaponize NEPA's procedural requirements to halt development—not because of genuine environmental concerns, but as an ideological strategy to prevent any fossil fuel development. As the Supreme Court unanimously agreed, NEPA is a procedural requirement to inform federal agencies and the public, not a roadblock to energy development.

3. Streamlined Environmental Analysis

The SPEED Act's provisions to simplify the analysis required in NEPA documents and allow agencies to use existing environmental reviews will ease the burden on both agencies and project proponents while maintaining environmental protections. Continental supports the bill's recognition that duplicative reviews waste resources without improving environmental outcomes.

THE SPEED ACT SUPPORTS AMERICA'S ENERGY AND ECONOMIC FUTURE

Meeting America's Skyrocketing Energy Demands

As you noted in introducing this legislation, America must be positioned to meet skyrocketing energy demands and lead the world in the AI race. Continental's operations directly support these national priorities by producing domestic oil and natural gas that power economic growth and maintain energy independence.

² H.R. 4776, § 3 (adding NEPA § 113(d)(1)(A) and (e)(1)(B)), 119th Cong. (2025) (establishing 150-day deadline for filing NEPA claims and 180-day deadline for court decisions).

³ H.R. 4776, § 3 (adding NEPA § 113(d)(1)(B)(i)), 119th Cong. (2025) (limiting standing to parties who submitted substantive comments during the public review period).

The rapid expansion of data centers and AI infrastructure is creating unprecedented electricity demand. Meeting this demand requires both robust power generation from all sources and the transmission infrastructure to deliver that power. The current permitting process, where litigation can add an average of four years to project timelines⁴—is incompatible with the pace of technological change and economic need.

Restoring America's Ability to Build

The SPEED Act reflects a fundamental truth: being a good steward of our environment does not require enduring a protracted, overly complex permitting process vulnerable to litigation abuse. Continental's decades of operational experience demonstrate that energy development and environmental protection can successfully coexist within a rational, efficient regulatory framework. The company has made significant investments in technologies and best practices designed to minimize its operational footprint, reduce emissions, and safeguard wildlife habitats. What we cannot overcome, however, is a permitting system that allows special interest groups to obstruct projects indefinitely through procedural and judicial challenges, regardless of a project's actual environmental impacts. The SPEED Act addresses this problem by restoring NEPA to its intended purpose while preserving genuine environmental review and public participation.

Economic Benefits and Regulatory Certainty

The regulatory certainty provided by the SPEED Act is essential for continued investment in American energy resources. Continental and other energy producers make long-term capital allocation decisions based on our ability to develop resources within reasonable and predictable timeframes. The current system—where projects can be delayed for years by litigation even after receiving full environmental review and agency approval—creates uncertainty that discourages investment and drives capital overseas.

The economic benefits of permitting reform are substantial. The federal government's own Council of Economic Advisers analysis shows that even modest improvements to permitting timelines for major infrastructure projects can save billions of dollars in regulatory costs while accelerating job creation and economic growth.⁵

BALANCING ENERGY DEVELOPMENT WITH ENVIRONMENTAL STEWARDSHIP

Continental emphasizes that our support for the SPEED Act does not diminish our commitment to environmental stewardship. On the contrary, we believe that efficient, focused

⁴ See Breakthrough Institute, *"Understanding NEPA Litigation"* (2023), at 3 ("On average, 4.2 years elapsed between publication of an environmental impact statement or environmental assessment and conclusion of the corresponding legal challenge at the appellate level."); see also *id.* at 12 ("Litigation delayed fossil fuel and clean energy project implementation by 3.9 years on average, despite the fact that agencies won 71% of those challenges."), https://thebreakthrough.imgix.net/pdfs/Breakthrough_Institute_Understanding_NEPA_Litigation.pdf. See also House Natural Resources Committee Press Release, Westerman and Golden Introduce Bipartisan Permitting Reform Legislation (July 25, 2025).

⁵ Council of Economic Advisers, "The Economic Benefits of Improved Infrastructure Permitting," Jan. 9, 2020, <https://trumpwhitehouse.archives.gov/articles/economic-benefits-improved-infrastructure-permitting/>.

environmental review produces better outcomes than the current system of endless procedural challenges.

The existing NEPA process often diverts agency resources away from substantive environmental analysis and toward litigation defense. The SPEED Act will allow agencies to focus their limited resources on genuine environmental assessment rather than procedural compliance designed primarily to delay and create litigation opportunities.

Moreover, Continental's experience demonstrates that effective environmental protection occurs through balanced management and responsible operational practices—not through preventing development altogether. Through Resource Management Plans, Area of Critical Environmental Concern designations, lease stipulations, and project-specific environmental review, federal agencies have robust tools to protect environmental resources while allowing responsible development.

CONCLUSION

Continental enthusiastically supports the SPEED Act and urges its swift passage. This bipartisan legislation will:

- Restore NEPA to its intended purpose as a procedural statute for informed decision-making
- Reduce frivolous litigation that delays critical infrastructure without improving environmental outcomes
- Provide the regulatory certainty necessary for continued investment in American energy resources
- Prevent courts from terminating projects based on minor procedural defects by limiting judicial remedies to remanding cases back to agencies
- Enable America to build the infrastructure needed to meet growing energy demands and maintain economic competitiveness
- Preserve genuine environmental review and public participation while eliminating procedural abuse

The SPEED Act represents a commonsense modernization of NEPA that will help launch America into a future where we can effectively innovate and implement solutions to meet our infrastructure and energy needs while maintaining environmental stewardship. America must lead by setting an example for the rest of the world on balancing environmental protection with economic strength and energy security.

Continental appreciates your leadership on this critical issue and looks forward to the SPEED Act's enactment into law. We stand ready to provide any additional information or technical assistance that may be helpful as this legislation advances.

Respectfully submitted,



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Blu Hulsey
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