



November 7, 2023

Via Electronic Filing

Tracy Stone-Manning
U.S. Department of the Interior, Director (630)
Bureau of Land Management
1849 C Street, NW,
Room 5646
Washington, DC 20240

Re: Proposed Rule, Bureau of Land Management; Management and Protection of the National Petroleum Reserve in Alaska (88 Fed. Reg. 62,025-62,043, Sept. 8, 2023); RIN 1004-AE95

Dear Director Stone-Manning:

The U.S. Chamber of Commerce (Chamber) appreciates the opportunity to comment on the Bureau of Land Management's (BLM) proposed Management and Protection of the National Petroleum Reserve in Alaska (NPR-A), proposed September 8, 2023.

Congress created the NPR-A as a commitment to U.S. energy security at a time of increasing energy use. A century after its designation, increased energy demand is forecast for decades to come. BLM's rule would make future development in NPR-A, including on existing leases, near impossible due to new restrictions and standards. The rule will jeopardize energy security for both the U.S. and its allies, and it fundamentally ignores the economic and climate benefits of domestic production. Further, it is counter to Congressional direction. As such, the Chamber opposes the proposed plan and encourages BLM to redraft it consistent with Congressional intent.

Energy Security

Throughput for the Trans-Alaska Pipeline System (TAPS), an important piece of U.S. critical infrastructure, has been declining for more than a decade, increasing the risk that it will fall below the required amount necessary to continue operating and supplying oil to West Coast refineries. The estimated production rate from Willow will increase the current TAPS throughput by 20% and ensure its long-term viability.

Additionally, Russia's invasion of Ukraine has highlighted the importance of energy security for the U.S. and its allies. Europe and Asia are again preparing for a winter heating season with very little Russian energy imports, driving up prices and threatening physical supplies of energy commodities. Increased and reliable production of oil and natural gas from the United States has blunted Russia's ability to use its energy exports to undermine global support for Ukraine. As one of the largest exporters of petroleum in the world, the United

States' ability to facilitate global diversification from Russian energy can only be enhanced by future NPR-A development.

Analysis from the U.S. Geological Survey estimates there are 8.7 billion barrels of undiscovered oil in the NPR-A, an important reserve created specifically by Congress for energy production. By denying development in the region, BLM is denying the state of Alaska, and the U.S., billions of dollars in revenue. BLM's proposed plan will also deny American consumers affordable and reliable energy at a time of persistently high fuel prices. This proposed plan undermines the reality that oil produced from the NPR-A can displace imports and will increase the likelihood of imports from less environmentally regulated regions of the world.

Economic & Environmental Benefits

The proposed plan relies on flawed economic analysis, which does not accurately account for the significant economic benefits delivered to local Alaska communities (including Alaska Native organizations) from NPR-A development. Federal law mandates that 50% of lease revenue from NPR-A projects go towards a unique grant program that prioritizes improvement projects to deliver social and environmental justice benefits to impacted communities, many of which are Alaska Native communities. The economic analysis fails to consider the impact to local communities of losing these future revenues. Additionally, the economic analysis does not consider the social implications of eliminating or dramatically restricting future development in the NPR-A that would remove jobs and a substantial portion of the tax base.

Global oil markets are expected to remain tight for the foreseeable future, and global oil demand is projected to remain strong in the long term. Future oil supply from the NPR-A could provide some of the most technologically advanced and environmentally and socially responsible barrels produced in the world, providing a net reduction in greenhouse gases as it displaces overseas imports with higher greenhouse gas intensity. The International Energy Administration estimates that the methane intensity of oil and gas production in Russia is 30 percent higher than in the United States. Emissions in Iran are 85% higher for each unit of energy produced, and Venezuela is off the charts at 652% higher.¹

¹ Greater U.S. Energy Production Is Needed to Reduce Reliance on Authoritarian Regimes, Global Energy Institute, Dan Byers, April 5, 2022, <https://www.globalenergyinstitute.org/greater-us-energy-production-needed-reduce-reliance-authoritarian-regimes>

Accordingly, the Chamber encourages BLM to withdraw this proposed plan and more properly consult with all stakeholders to ensure the final plan properly balances economic benefits, energy security, and the climate benefits the NPR-A offers and, importantly, is consistent with Congressional intent.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Guith". The signature is fluid and cursive, with a large initial "C" and a stylized "G".

Christopher Guith
Senior Vice President
Global Energy Institute
U.S. Chamber of Commerce