

**The Office of the Assistant Secretary,
Land and Minerals Management**

Action Plans Pursuant to Secretarial
Orders

regarding

The Bureau of Land Management,

The Bureau of Ocean Energy
Management,

The Bureau of Safety and Environmental
Enforcement,

and

The Office of Surface Mining
Reclamation and Enforcement

**SO 3417 - Addressing the National
Energy Emergency**

ASLM Action Plans Pursuant to SO 3417 – Addressing the National Energy Emergency

POLICY GOALS

Bureau of Land Management (BLM)

- Reduce barriers to and burdens on domestic energy and minerals (including critical minerals) development

Bureau of Ocean Energy Management (BOEM)

- Expedite identification, permitting, leasing, development, and production of domestic energy resources and critical minerals on the Outer Continental Shelf (OCS)

Bureau of Safety and Environmental Enforcement (BSEE)



**Bureau of Land Management
(BLM)**

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3417 – Addressing the National Energy Emergency

Summary:

Section 4(a) of SO 3417 requires all bureaus to identify the emergency authorities available to them, as well as all other legal authorities, to facilitate the identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation of domestic energy resources and critical minerals.

Section 4(b) of SO 3417 requires all bureaus to identify all relevant emergency and other legal authorities available to them to expedite the completion of all authorized and appropriate infrastructure, energy, environmental, and natural resources projects within their jurisdiction to perform or to advance, including use of all authorities to facilitate the supplying, refining, transporting, and exporting of energy including, but not limited to, in and through the West Coast of the United States, the Northeast of the United States, and Alaska.

Because of the overlap between the two Sections, the Bureau's work on them will be consolidated into one effort. The Bureau is working with the Office of the Solicitor (SOL) on implementation of SO 3417.


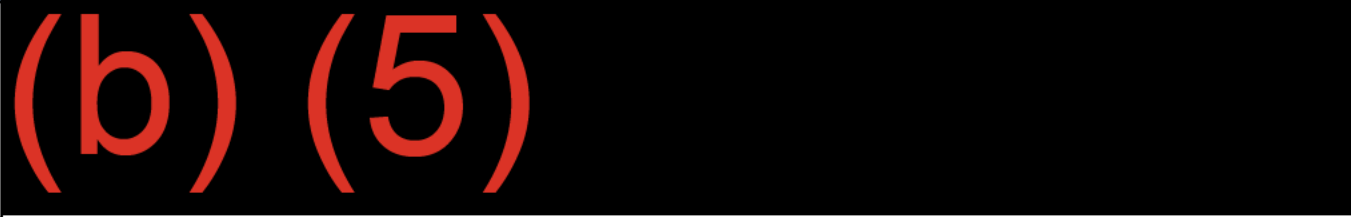
Top priorities:

(b) (5)

Additional Information:

None.

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3417 – Addressing the National Energy Emergency

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Bureau of Land Management				
Initiative					
<p>Section 4(a) of SO 3417 requires all bureaus to identify the emergency authorities available to them, as well as all other legal authorities, to facilitate the identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation of domestic energy resources and critical minerals.</p> <p>Similarly, Section 4(b) requires all bureaus to identify all relevant emergency and other legal authorities available to them to expedite the completion of all authorized and appropriate infrastructure, energy, environmental, and natural resources projects within their jurisdiction to perform or to advance, including use of all authorities to facilitate the supplying, refining, transporting, and exporting of energy including, but not limited to, in and through the West Coast of the United States, the Northeast of the United States, and Alaska.</p>					
					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Reduce barriers to and burdens on domestic energy and minerals (including critical	Work will identify authorities for consideration.				

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3417 – Addressing the National Energy Emergency

minerals) development.		(b) (5)			
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Milestones	Due Date	Measurable Metrics
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(b) (5)		
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**Bureau of Ocean Energy Management
(BOEM)**

Assistant Secretary – Land and Minerals Management Action Plan for SO 3417 – Addressing the National Energy Emergency

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	BOEM				
Initiative					
<p>Section 4.a. Identify the emergency authorities available to DOI Bureaus and Offices, as well as all other legal authorities, to facilitate the identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation of domestic energy resources and critical minerals including, but not limited to, on Federal lands and the Outer Continental Shelf.</p>					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Expedite identification, permitting, leasing, development, and production of domestic energy resources and critical minerals on the Outer Continental Shelf (OCS)	<p>ESA (Endangered Species Act) - 50 CFR §402.05;</p> <p>NEPA (National Environmental Policy Act) - 40 CFR §1506.11;</p> <p>NHPA(National Historic Preservation Act)/Sec 106 - 36 CFR §800.12</p>	(b) (5)			

			(b) (5)		
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Milestones	Due Date	Measurable Metrics
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(b) (5)		
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Initiative					
<p>Section 4.b. All Department Bureaus and Offices will identify all relevant emergency and other legal authorities available to them to expedite the completion of all authorized and appropriate infrastructure, energy, environmental, and natural resources projects within their jurisdiction to perform or to advance, including use of all authorities to facilitate the supplying, refining, transporting, and exporting of energy including, but not limited to, in and through the West Coast of the United States, the Northeast of the United States, and Alaska.</p>					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Milestones	Due Date	Measurable Metrics			
(b) (5)					


Attachments List:

Attachment 1: [SO 3417 – Review of Emergency Authorities available to BOEM](#)

ATTACHMENT 1: SO 3417 - BOEM Emergency Authorities – Review and Recommendations

SO 3417 - Addressing the National Energy Emergency

Listed below are key statutes where emergency authority exists in some form and important notes or actions.

Legislation containing emergency authority	Does BOEM have discretion to apply this authority? If not BOEM, then who? Any actions to take?
<p>ESA 50 CFR §402.05 – Emergencies (a) Where emergency circumstances mandate the need to consult in an expedited manner, consultation may be conducted informally through alternative procedures that the Director determines to be consistent with the requirements of sections 7(a)–(d) of the Act. This provision applies to situations involving acts of God, disasters, casualties, national defense or security emergencies, etc. (b) Formal consultation shall be initiated as soon as practicable after the emergency is under control. The Federal agency shall submit information on the nature of the emergency action(s), the justification for the expedited consultation, and the impacts to endangered or threatened species and their habitats. The Service will evaluate such information and issue a biological opinion including the information and recommendations given during the emergency consultation.</p>	

NEPA - 40 CFR §1506.11

Where emergency circumstances make it necessary to take an action with significant effects without observing the provisions of the regulations in this subchapter, the Federal agency taking the action **shall consult with the Council about alternative arrangements for compliance with section 102(2)(C) of NEPA**. Agencies and the Council shall limit such arrangements to actions necessary to control the immediate impacts of the emergency; other actions remain subject to NEPA review consistent with this subchapter. Alternative arrangements do not waive the requirement to comply with the statute but establish an alternative means for NEPA compliance.

NHPA/Sec 106 - 36 CFR §800.12

(b) Alternatives to agency procedures. In the event an agency official proposes an emergency undertaking as an essential and immediate response to a disaster or emergency declared by the President, a tribal government, or the Governor of a State or another immediate threat to life or property, and the agency has not developed procedures pursuant to paragraph (a) of this section, the agency official may comply with section 106 by:

- (1) Following a programmatic agreement developed pursuant to S 800.14(b) that contains specific provisions for dealing with historic properties in emergency situations; or
- (2) Notifying the Council, the appropriate SHPO/THPO and any Indian tribe or Native Hawaiian organization that may attach religious and cultural significance to historic properties likely to be affected prior to the undertaking and affording them an opportunity to comment within seven days of notification. If the agency official

(b) (5)

determines that circumstances do not permit seven days for comment, the agency official shall notify the Council, the SHPO/THPO and the Indian tribe or Native Hawaiian organization and invite any comments within the time available.

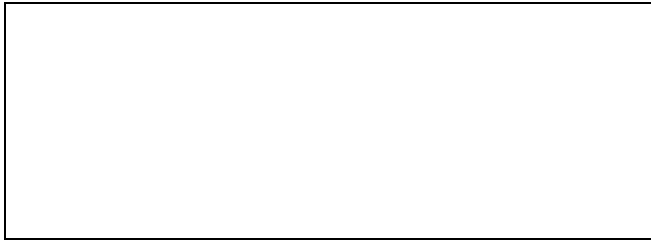
...

(d) Applicability. This section applies only to undertakings that will be implemented within 30 days after the disaster or emergency has been formally declared by the appropriate authority. An agency may request an extension of the period of applicability from the Council prior to the expiration of the 30 days. Immediate rescue and salvage operations conducted to preserve life or property are exempt from the provisions of section 106 and this part.

[OCSLA - 43 USC § 1341\(c\)](#), but only for suspending operations on leases. All leases issued under this subchapter, and leases, the maintenance and operation of which are authorized under this subchapter, shall contain or be construed to contain a provision whereby authority is vested in the Secretary, upon a recommendation of the Secretary of Defense, during a state of war or national emergency declared by the Congress or the President of the United States after August 7, 1953, to suspend operations under any lease; and all such leases shall contain or be construed to contain provisions for the payment of just compensation to the lessee whose operations are thus suspended.

[CAA - 42 USC § 7410\(f\)](#): State Implementation Plans

(b) (5)



The below statutes were reviewed in addition to those listed in the table above.

- CZMA - Coastal Zone Management Act: 16 U.S.C. §§ 1451 et seq.
- OPA - Oil Pollution Act: 33 U.S.C. Chapter 40
- GOMESA - Gulf of Mexico Energy Security Act: Public Law 109-432
- NMSA - National Marine Sanctuary Act: 16 U.S.C. §§ 1431 et seq.
- MSFCMA - Magnuson-Stevens Fishery Conservation and Management Act: 16 U.S.C. §§ 1801 et seq.
- MBTA - Migratory Bird Treaty Act: 16 U.S.C. §§ 703-712
- MMPA - Marine Mammal Protection Act: 16 U.S.C. §§ 1361-1407
- CWA - Clean Water Act: 33 U.S.C. §§ 1251 et seq.
- CAA - Clean Air Act: 42 U.S.C. Chapter 85

There are no emergency authorities under the CZMA, OPA, GOMESA, NMSA, MSFCMA, MBTA, and MMPA. Under the CWA, the Administrator of the EPA has emergency powers, but is only applicable to restraining any person discharging pollutants and they are not applicable to SO 3417.

List of acronyms:

- ESA – Endangered Species Act
- NEPA – National Environmental Policy Act
- NHPA – National Historical Preservation Act
- OCSLA – Outer Continental Shelf Lands Act

**Bureau of Safety and Environmental
Enforcement
(BSEE)**



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

February 13, 2025

Memorandum

To: Cara Lee Macdonald
Chief of Staff, Exercising the Delegated Authorities of
the Assistant Secretary, Land and Minerals Management

From: Paul P. Huang
Acting Director
Bureau of Safety and Environmental Enforcement

Subject: Action Plan to Implement Secretarial Order 3417 - Addressing the National Energy
Emergency

Summary

In accordance with Secretarial Order (S.O.) 3417 - Addressing the National Energy Emergency issued by Secretary Burgum on February 3, 2025, BSEE prepared the following action plan to ensure the efficient and timely implementation of President Trump's January 20, 2025, Executive Order (EO) 14156, titled "Declaring a National Energy Emergency." A cross-bureau team reviewed all agency actions subject to the directives in Section 4 of S.O. 3417 to create an action plan that identifies all relevant legal authorities, including emergency authorities, available to expedite all authorized processes associated with energy development within BSEE's jurisdiction on the federal Outer Continental Shelf (OCS), nationwide.

Top Priorities

In order to ensure efficiency and accountability in all BSEE-specific actions related to the approval of OCS operations, we recommend the following priorities for S.O. 3417 Section 4 implementation:



(b) (5)

Additional Information

(b) (5)

(b) (5)

We stand ready to support the requests for more information on this strategy, including the approval of the included priority goals and associated action plan. Please let me or BSEE's Chief of Staff, Wes James (Weston.James@bsee.gov) know if you have any questions.

cc: Acting Director, BOEM



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
 WASHINGTON, DC 20240-0001

Table 1

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Assistant Secretary for Land and Minerals Management				
Submitted by	Bureau of Safety and Environmental Enforcement				
Initiative					
Section 4.a: All Bureaus and Offices of the Department of the Interior (Department) will identify the emergency authorities available to them, as well as all other legal authorities, to facilitate the identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation of domestic energy resources and critical minerals including, but not limited to, on Federal lands and the Outer Continental Shelf. Each such Bureau and Office will develop a plan for use of those authorities and submit those plans to the Secretary within 15 days.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
(b) (5)					
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)

Table 2

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Assistant Secretary for Land and Minerals Management				
Submitted by	Bureau of Safety and Environmental Enforcement				
Initiative					
Section 4.a: All Bureaus and Offices of the Department of the Interior (Department) will identify the emergency authorities available to them, as well as all other legal authorities, to facilitate the identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation of domestic energy resources and critical minerals including, but not limited to, on Federal lands and the Outer Continental Shelf. Each such Bureau and Office will develop a plan for use of those authorities and submit those plans to the Secretary within 15 days.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
(b) (5)					
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)

Table 3

Responsive to	SO 3417 – Addressing the National Energy Emergency
Accountable	Assistant Secretary for Land and Minerals Management
Submitted by	Bureau of Safety and Environmental Enforcement

Initiative

Section 4.a: All Bureaus and Offices of the Department of the Interior (Department) will identify the emergency authorities available to them, as well as all other legal authorities, to facilitate the identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation of domestic energy resources and critical minerals including, but not limited to, on Federal lands and the Outer Continental Shelf. Each such Bureau and Office will develop a plan for use of those authorities and submit those plans to the Secretary within 15 days.

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
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(b) (5)

(b) (5)

Milestones

Due Date

Measurable Metrics

(b) (5)

(b) (5)

Table 4

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Assistant Secretary for Land and Minerals Management				
Submitted by	Bureau of Safety and Environmental Enforcement				
Initiative					
Section 4.a: All Bureaus and Offices of the Department of the Interior (Department) will identify the emergency authorities available to them, as well as all other legal authorities, to facilitate the identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation of domestic energy resources and critical minerals including, but not limited to, on Federal lands and the Outer Continental Shelf. Each such Bureau and Office will develop a plan for use of those authorities and submit those plans to the Secretary within 15 days.					
Policy goal(s)	Legal	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
(b) (5)					
Milestones	Due Date	Measurable Metrics			
(b) (5)					

SO 3418 - Unleashing American Energy

ASLM Action Plans Pursuant to SO 3418 - Unleashing American Energy

POLICY GOALS

Bureau of Land Management (BLM)

(b) (5)

Bureau of Ocean Energy Management (BOEM)

(b) (5)

Bureau of Safety and Environmental Enforcement (BSEE)

(b) (5)

Office of Surface Mining Reclamation and Enforcement (OSMRE)

(b) (5)

**Bureau of Land Management
(BLM)**

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

Summary:

Section 4(b) of SO 3418 requires the Assistant Secretary for Land and Minerals Management (ASLM) to develop an action plan describing the steps that will be taken to “suspend, revise, or rescind” certain decisions, including several Bureau of Land Management (BLM) regulations, Instruction Memoranda (IM), and planning decisions. Actions to be taken by the BLM are described below. Tables are provided for each of the BLM’s top priorities. (b) (5)

Section 4(c) of SO 3418 requires the ASLM to develop an action plan describing the steps to be taken that would accomplish other Department priority actions, including reducing barriers to the use of Federal lands for energy development and removing undue burdens on domestic mining and processing of nonfuel minerals.

Top priorities:

(b) (5)

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

Additional Information:

The following actions will reduce barriers to the use of Federal lands for energy development, consistent with the BLM's mission of managing public lands for multiple use and sustained yield, Congressional oversight, and Department authorities specific to Alaska. (b) (5)

BLM and National Park Service (NPS) leadership will review the final NPS rule published in the *Federal Register* on December 5, 2024, entitled "Rights of Way" to evaluate impacts on access for exploration and development, particularly in Alaska; assess resulting costs; and submit those findings to the Office of Information and Regulatory Affairs (OIRA) for a "major rule" determination under 5 U.S.C. § 804(2).

Upon review and concurrence from BLM leadership on the specific actions listed below, the BLM will prepare a plan of action and milestones for these actions as appropriate:



Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

(b) (5)

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy



Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy SO 3422 - Unleashing Alaska’s Extraordinary Resource Potential EO 14153 - Unleashing Alaska’s Extraordinary Resource Potential				
Accountable	National Park Service in coordination with Bureau of Land Management				
Initiative					
Section 4(c). The BLM will coordinate with NPS in evaluating the final NPS rule issued December 5, 2024, entitled “Rights of Way” to identify and remove any undue barriers: (a) to the use of Federal lands for energy development; and (b) on domestic mining and processing of nonfuel minerals. This includes deference to Alaska-specific laws and regulations, including 43 C.F.R. Part 36, and, unless solicitor review indicates otherwise, includes submitting the rule to OIRA as soon as practicable for a “major rule” determination.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Align and meet access needs for increased domestic energy and mineral production	5 U.S.C. § 804; 16 U.S.C. § 3161-3173; 54 U.S.C. § 100902	(b)	(5)		
Milestones		Due Date		Measurable Metrics	
(b)		(5)			

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
<p>Section 4(b). The BLM will: (1) develop an options briefing paper for each of the following rules and associated IM(s) that provides a recommendation on whether to (a) rescind/suspend or (b) revise; (2) include a briefing paper summarizing all rules and any IMs issued since June 1, 2024, for review by the Solicitor; (3) if the BLM recommends rescission of a rule or IM in its entirety, identify what would be the default in its place and any consequences associated with such action; and (4) if the BLM recommends revision of a rule or IM, identify options to retain, revise, or remove provisions from the rule or IM along with the BLM’s reasoning. This recommendation will also address whether and how to rescind or revise corresponding handbooks and manuals. Upon receiving Department direction based on the options briefing papers, the Bureau will prepare a detailed schedule for work on each rule or IM. This applies to the following:</p> <ol style="list-style-type: none"> Fluid Mineral Leases and Leasing Process, 89 Fed. Reg. 30916 (Apr. 23, 2024) and related documents: <ul style="list-style-type: none"> IM 2023-006, Implementation of Section 50265 in the Inflation Reduction Act for Expressions of Interest for Oil and Gas Lease Sales (Nov. 21, 2021), and other IMs related to the Fluid Mineral Leases and Leasing Process rule. Handbooks and manual provisions implementing changes made by the Fluid Mineral Leases and Leasing Process rule. Waste Prevention, Production Subject to Royalties, and Resource Conservation, 89 Fed. Reg. 25378 (Apr.10, 2024) and Waste Prevention, Production Subject to Royalties, and Resource Conservation, 89 Fed. Reg. 92602 (Nov. 22, 2024) (technical corrections). Rights-of-Way, Leasing, and Operations for Renewable Energy, 89 Fed. Reg. 35634 (May 1, 2024). Conservation and Landscape Health, 89 Fed. Reg. 40308 (May 9, 2024) and related documents: <ul style="list-style-type: none"> IM 2024-035 Implementation Guidance, IB 2024-048 Land Use Planning Requirements, IM 2024-035 Restoration Prioritization & Planning, IM 2024-036 Watershed Condition Assessment, IM 2024-037 Land Health Standards, IM 2024-038 Restoration & Mitigation Leasing, Manual Section-1613 Areas of Critical Environmental Concern 					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Remove barriers, increase domestic energy production, and ensure regulations do not bias one form of	5 U.S.C. § 553 (to revise the rules); 5 U.S.C. § 804(2); and 43 U.S.C. § 1740	(b)	(5)		

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

energy over another.		(b) (5)		
Remove barriers, increase domestic energy production.				
Milestones	Due Date	Measurable Metrics		
(b) (5)				

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
<p>Section 4(c). The BLM is developing a plan of action and schedule for review of all relevant draft, proposed, and finalized RMPs and RMP Amendments and associated EISs including, but not limited to the following. For these and other RMPs identified, the BLM is developing a plan of action and schedule for ensuring the RMPs support increased domestic energy production:</p> <ol style="list-style-type: none"> 1. Proposed RMP and Final EIS for the Rock Springs Field Office, Wyoming (NOA, 89 Fed. Reg. 68187, Aug. 23, 2024) (as listed in SO, RMP now final) 2. Proposed RMP Amendment and Final EIS for Greater Sage-Grouse Rangewide Planning (NOA, 89 Fed. Reg. 90311, Nov. 15, 2024) 3. Record of Decision and Approved RMP Amendment for the Buffalo Field Office, Wyoming (NOA, 89 Fed. Reg. 93650, Nov. 27, 2024) 4. Record of Decision and Approved RMP Amendment for the Miles City Field Office, Montana (NOA, 89 Fed. Reg. 93650 (Nov. 27, 2024) 5. Unreleased draft Uncompahgre Field Office RMP 6. Draft Carlsbad RMP Revision 7. Supplemental Environmental Impact Statement and RMP amendment to the 2014 Bakersfield Field Office Approved RMP (consistent with the settlement agreement in Case No. 2:15-cv-04378-MWF/JEM (C.D. Cal.) 					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date

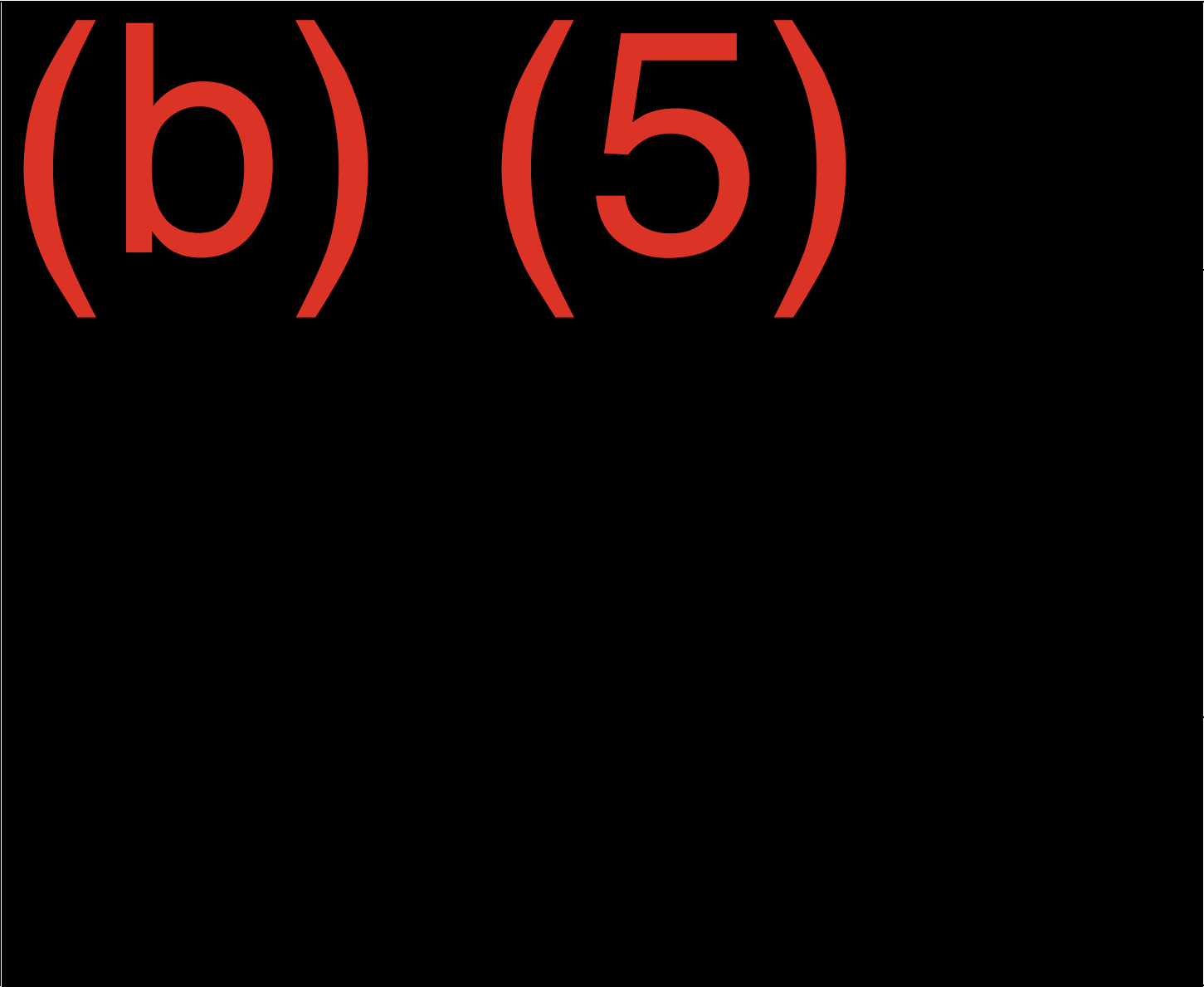
Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Increase domestic energy production.	Federal Land Policy and Management Act (FLPMA) NEPA	(b) (5)		
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Milestones	Due Date	Measurable Metrics
(b) (5)		

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(b). The BLM is taking the following actions to offer more parcels of public land for oil and gas leasing, including through quarterly lease sales, or additional lease sales, as appropriate and consistent with existing law.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Increase domestic energy production.	16 U.S.C. § 3148; Mineral Leasing Act of 1920, as amended (30 U.S.C. §	(b) (5)			

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

	181 et seq.); 43 C.F.R. Parts 3100, 3200	
Increase domestic energy production.	Mineral Leasing Act of 1920, as amended (30 U.S.C. § 181 et seq.); 43 C.F.R. Parts 3100, 3200	
Increase domestic energy production.	Mineral Leasing Act of 1920, as amended (30 U.S.C. § 181 et seq.); 43 C.F.R. Parts 3100, 3200	

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

		(b) (5)	
Increase domestic energy production.	Mineral Leasing Act of 1920, as amended (30 U.S.C. § 181 et seq.); 43 C.F.R. Parts 3100, 3200		
Milestones	Due Date	Measurable Metrics	
(b) (5)			

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
<p>Section 4(c). The BLM is reviewing withdrawn lands and, consistent with applicable law, will recommend modifications to withdrawals to eliminate undue burdens on fuel and non-fuel minerals. The review will evaluate existing withdrawals whose modification or revocation lie within Secretarial discretion to make additional lands available for energy development, minerals exploration (including sand and gravel) or other activities that support energy infrastructure. The review will also evaluate withdrawal proposals or applications that have been published in the <i>Federal Register</i>; absent Secretarial action, the segregations initiated by these notices terminate two-years from publication of such notice by operation of law. This evaluation will start with review of the following withdrawals and segregations:</p> <ol style="list-style-type: none"> 1. Public Land Order No. 7787, Withdrawal of Public and National Forest System Lands in the Grand Canyon Watershed; Arizona (77 FR 2563) (lands are included in the Ancestral Footprints National Monument so additional action would be required to open these lands); 2. Public Land Order No. 7923 for Public Lands Withdrawal Surrounding Chaco Culture National Historical Park Boundary; San Juan, Sandoval, and McKinley Counties, New Mexico (88 FR 37266); 3. Public Land Order No. 7940; Placitas Area Withdrawal, New Mexico (89 FR 31763); and 4. Withdrawal Application, Ruby Mountains, Nevada (U.S. Forest Service application) (89 FR 107157). <p>The BLM also plans to undertake a review of existing national monuments managed by the BLM and designated under the Antiquities Act to identify any associated withdrawals made under 54 U.S.C. § 320301 that impose undue burdens on energy or mineral production. A plan of action and schedule for these reviews will be developed.</p>					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Reduce undue burdens on and barriers to fuel and non- fuel development.	FLPMA, section 204 (43 U.S.C. § 1714; 43 C.F.R. part 2300)	(b) (5)			

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

		(b) (5)
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Milestones	Due Date	Measurable Metrics
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(b) (5)		
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Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(c). The Assistant Secretary’s action plan must identify steps that will be taken “to reinstate, as appropriate, all leases issued by the [BLM] for natural resource development that were cancelled between January 20, 2021, and noon on January 21, 2025.”					
The BLM is considering the available steps to reinstate, where appropriate, all such leases, e.g., two leases held by Twin Metals in the Superior National Forest (lands also withdrawn so additional action will be required). The Bureau is developing a list of leases and will develop a plan and schedule for reinstating those leases not vacated by court order.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Increase domestic energy and mineral production.	Varies by lease. Will work with SOL to determine approach for identified leases.	(b)	(5)		
Milestones	Due Date	Measurable Metrics			
(b)	(5)				

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(c). The BLM is reviewing existing regulations, policy, and guidance to identify any undue burdens on domestic mining and processing of nonfuel minerals. The BLM is developing a plan of action and schedule for the review. The BLM has already identified Categorical Exclusions (CX) as an area for action to relieve undue burdens through both the adoption of CXs and development of new CXs.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Removing undue burdens in permitting.	National Environmental Policy Act, 42 U.S.C. § 4336(c) (Section 109 added by the Fiscal Responsibility Act)	(b) (5)			
Removing undue burdens in permitting.	National Environmental Policy Act				

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

		(b) (5)	
Removing undue burdens in permitting.	Same as above		
Milestones	Due Date	Measurable Metrics	
(b) (5)		(b) (5)	

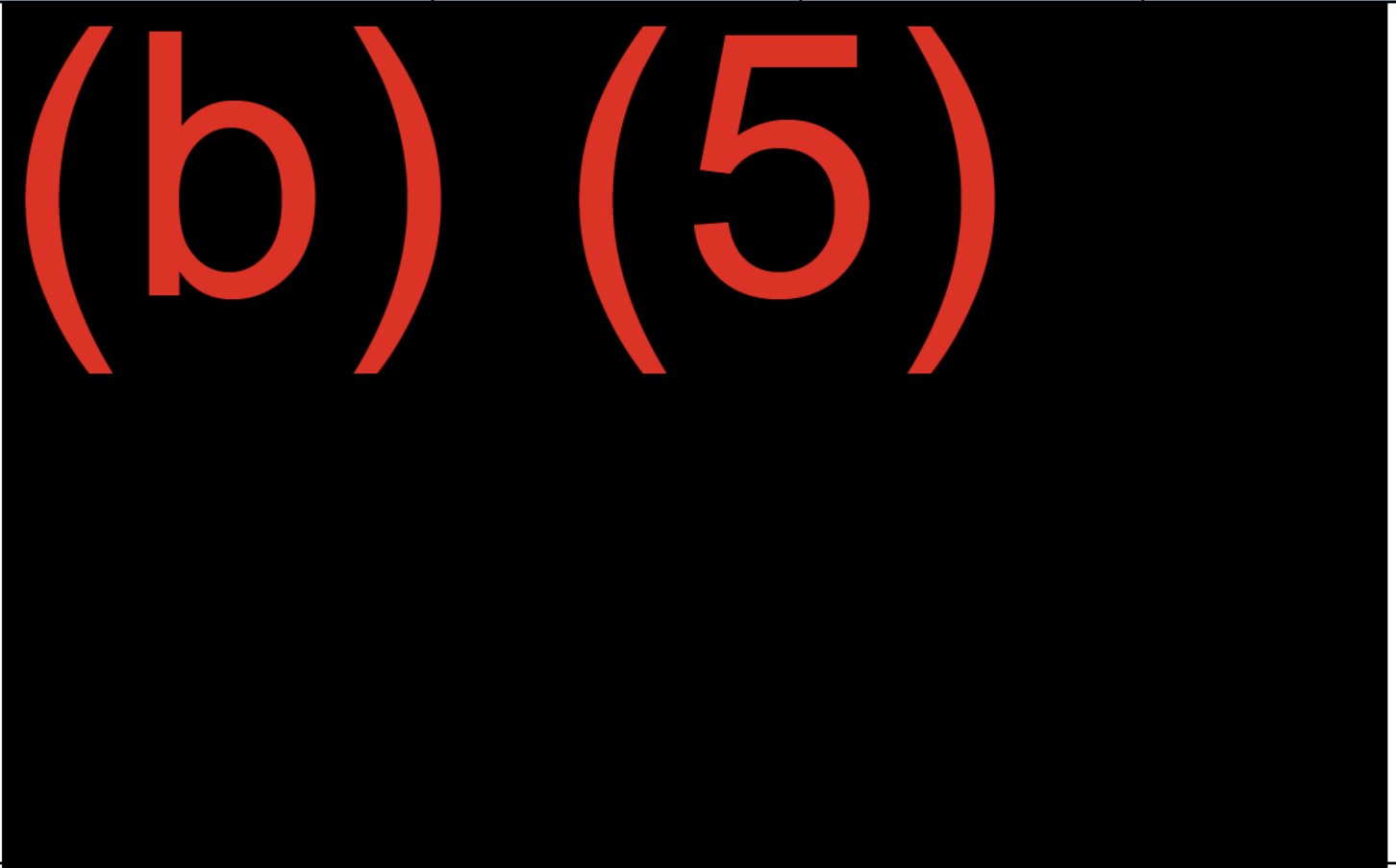
Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(c). As noted above, the BLM is reviewing existing regulations, policy, and guidance to identify any undue burdens on domestic mining and processing of nonfuel minerals and is developing a plan of action and schedule for the review. In addition to the NPS rule and adoption and development of CXs, described above, (b) (5)					
Policy goal(s)	Legal Authority	Recommendations	Barriers to Overcome	Metrics for Success	Final Due Date
Removing undue burdens on domestic mining.	5 U.S.C. § 553 (to revise the rules)	(b) (5)			
Removing undue					

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

burdens on domestic mining.		(b) (5)		
Milestones		Due Date	Measurable Metrics	
(b) (5)				

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(c). The BLM is reviewing existing regulations, policy, and guidance to identify actions that prioritize reducing barriers to the use of Federal lands for energy development, consistent with the principle of multiple use. The BLM has identified outdated (b) (5) as a barrier to energy development on Federal lands and is developing a plan of action and schedule for proposed rule revision.					
Policy goal(s)	Legal Authority	Recommendations	Barriers to Overcome	Metrics for Success	Final Due Date
Removing barriers to the use of Federal lands for energy development.	5 U.S.C. § 553 (to revise the rules); 30 U.S.C. § 1023				

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(c). As noted above, the BLM is reviewing existing regulations, policy, and guidance to identify any undue burdens on domestic mining and processing of nonfuel minerals and is developing a plan of action and schedule for the review. In addition to the NPS rule and adoption and development of CXs, described above, regulations at (b) (5), were identified as unduly burdensome.					
Policy goal(s)	Legal Authority	Recommendations	Barriers to Overcome	Metrics for Success	Final Due Date
Removing undue burdens on domestic mining.	5 U.S.C. § 553 (to revise the rules) 43 C.F.R. Part 3600, Mineral Materials Disposal	(b) (5)			

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

			(b) (5)		
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Milestones	Due Date	Measurable Metrics
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(b) (5)		
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Responsive to	SO 3418 - Unleashing American Energy
Accountable	Bureau of Land Management
Initiative	
Section 4(c). The Assistant Secretary’s action plan must identify steps that will be taken to ensure that, unless required by law, applicable existing or new rules, guidance, and policies relating to the development of energy resources on Federal land do not bias government or private-sector decision making in favor of renewable energy projects as compared to oil, gas, or other mineral resource projects.	

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

The BLM is reviewing existing rules, guidance, and policies to identify any that bias government decision making in favor of renewable energy projects as compared to oil, gas, or other mineral resource projects. Going forward, it will similarly review new rules, guidance, and policies to ensure that none is based on such bias.

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Ensure no bias toward renewable energy development.	Secretarial Orders	(b) (5)			

Milestones	Due Date	Measurable Metrics
(b) (5)		

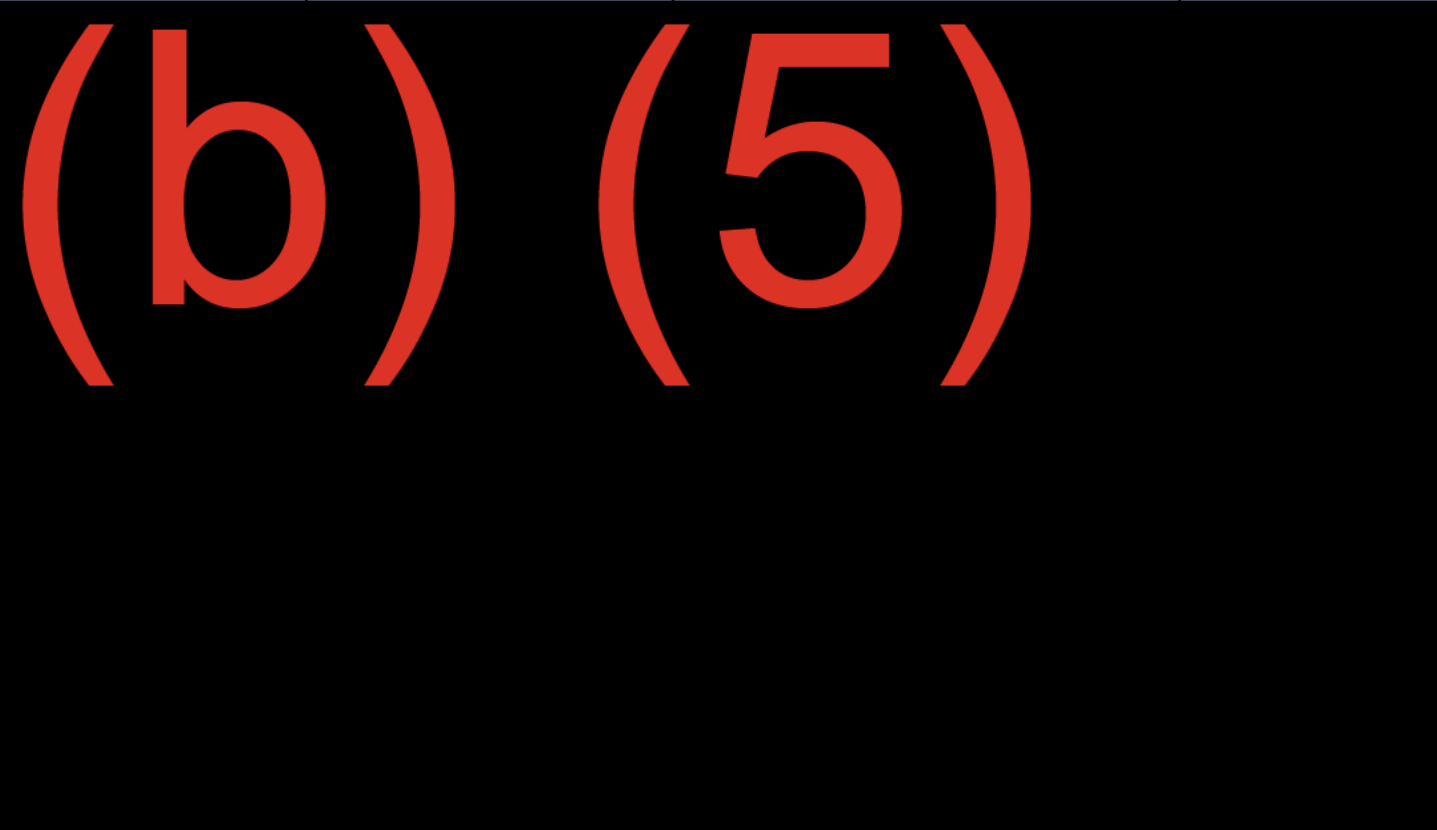
Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(c). Identify and reduce the threat of wildfire to infrastructure related to energy sources. Manage permits and rights-of-way associated with energy development across the nation to make sure that actions/stipulations are in place to minimize the threat of wildfire to that infrastructure and maintain access for permittees and service providers. Infrastructure Investment Jobs Act (IIJA) Section 40803 authorized treatments to protect communities and infrastructure, including ROWs that service communities.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Reduce risks to energy infrastructure from wildfires.	FLPMA, Title V; P.L. 96-487, Title XI (for Alaska)	(b) (5)			
Reduce wildfire risks associated with energy infrastructure.	FLPMA, Section 512; P.L. 96-487, Title XI (for Alaska)				

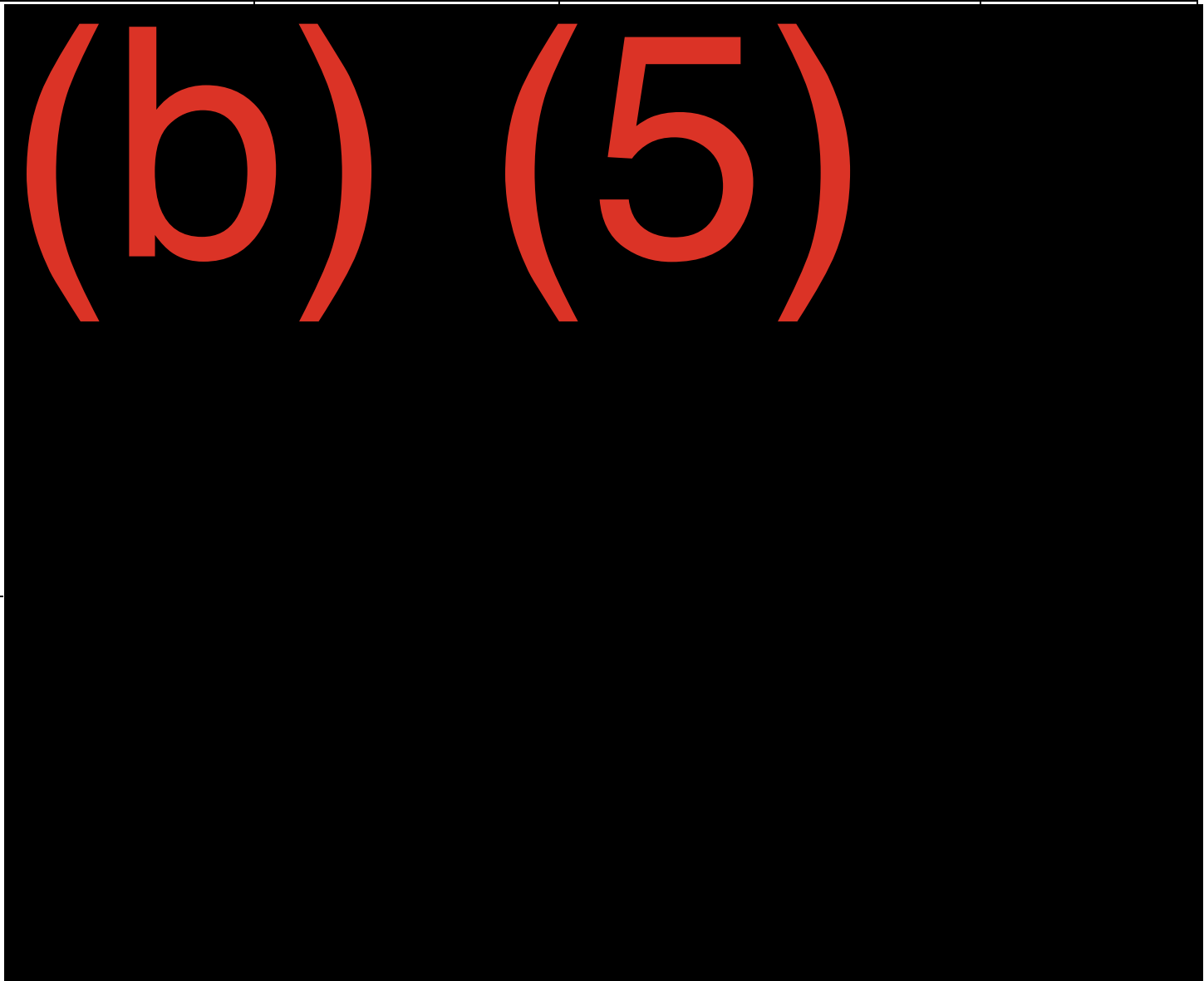
Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

		(b) (5)		
Milestones	Due Date	Measurable Metrics		
(b) (5)				

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary’s Order 3418 - Unleashing American Energy

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(c). The Assistant Secretary’s action plan must identify steps that will be taken to review all relevant internal regulations, policies, and guidance to ensure the lawful implementation of Section 106 of the NHPA, 54 U.S.C. § 306108. The BLM is crafting a plan to streamline Section 106 consultation. The BLM has identified four recommended program and policy actions that would create efficiencies that reflect the needs of our communities, respect Tribal sovereignty, and drive innovation.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Eliminate undue burdens on development of domestic energy.	NHPA and implementing regulations				
Eliminate undue burdens on development	NHPA and implementing regulations				

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

<p>of domestic energy.</p>		
<p>Eliminate undue burdens on development of domestic energy.</p>	<p>NHPA and implementing regulations</p>	

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

			(b) (5)		
Eliminate undue burdens on development of domestic energy.	NHPA and implementing regulations	(b) (5)			

Title: Assistant Secretary for Land and Minerals Management Action Plan for Secretary's Order 3418 - Unleashing American Energy

			(b) (5)		
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Milestones	Due Date	Measurable Metrics
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(b) (5)		
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**Bureau of Ocean Energy Management
(BOEM)**

Assistant Secretary – Land and Minerals Management Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	BOEM				
Initiative					
Section 4.a. Take all necessary steps to ensure any actions taken to implement the revoked EOs are terminated, including but not limited to, terminating any contract or agreement on behalf of entities or programs abolished in the revoked EOs.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Termination of Bureau actions taken in response to revoked EOs		(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b)		(5)			

Initiative					
Section 4.b. Steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to, the following regulations, Secretary's Orders (SO), Solicitor's Opinions, Instruction Memoranda (IM), and Departmental Manuals (DM): "Risk Management and Financial Assurance for OCS Lease and Grant Obligations," 89 Fed. Reg. 31544 (April 24, 2024)					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Encouraging energy exploration and production on the Outer Continental Shelf (OCS)		(b)	(5)		
Milestones	Due Date	Measurable Metrics			
(b)	(5)				

Initiative					
Section 4.b. Steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to, the following regulations, Secretary's Orders (SO), Solicitor's Opinions, Instruction Memoranda (IM), and Departmental Manuals (DM): "Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico" (March 13, 2020)					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Encouraging energy exploration and production on the Outer Continental Shelf		(b)	(5)		

		(b) (5)			
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Milestones	Due Date	Measurable Metrics			
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(b) (5)

Initiative					
Section 4.b. Steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to, the following regulations, Secretary's Orders (SO), Solicitor's Opinions, Instruction Memoranda (IM), and Departmental Manuals (DM): "Proposed Final Program, 2024-2029 National Outer Continental Shelf Oil and Gas Leasing 5-Year Plan" (September 29, 2023).					
Section 4.c. Steps to be taken that would accomplish, at a minimum, actions to review the 5-year program for offshore oil and gas leasing to assess the need for changes to meet the Nation's energy goals, consistent with the principles outlined in the Outer Continental Shelf Lands Act.					
Policy goal(s)	Legal Authority	Recommendations	Barriers to Overcome	Metrics for Success	Final Due Date
Encouraging energy exploration and production on the Outer Continental Shelf	Section 18 of the Outer Continental Shelf Lands Act (43 U.S.C. § 1344)	(b) (5)			

(b) (5)

Milestones	Due Date	Measurable Metrics
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4b.NP.1 Publication of a new National OCS Oil and Gas Leasing Program.

(b) (5)

(b) (5)

4b.NP.2 Accelerated execution of up to three lease sales in the Gulf of America region, beginning with Lease Sale 262.

(b) (5)

(b) (5)

Initiative

Section 4.b. Steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to, the following regulations, Secretary's Orders (SO), Solicitor's Opinions, Instruction Memoranda (IM), and Departmental Manuals (DM):

"Revocation of Secretary's Orders Inconsistent with Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis," SO 3398 (April 16, 2021);

"Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process," SO 3399 (April 16, 2021); and

Departmental Manuals: "522 DM 1 - Adaptive Management Implementation Policy" (September 27, 2023), "523 DM 1 - Climate Change Policy" (September 27, 2023), "526 DM 1 -Applying Climate Change Science" (September 28, 2023), and "604 DM 1 - Implementing Landscape-Level Approaches to Resource Management" (September 28, 2023)

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date

Milestones	Due Date	Measurable Metrics
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(b) (5)

Initiative					
Section 4.b. Steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to, the following regulations, Secretary's Orders (SO), Solicitor's Opinions, Instruction Memoranda (IM), and Departmental Manuals (DM): "Secretary's Duties under Subsection 8(p)(4) of the Outer Continental Shelf Lands Act When Authorizing Activities on the Outer Continental Shelf" M-37067 (April 9, 2021)					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Encouraging energy exploration and production on the Outer Continental Shelf and ensuring all regulatory requirements related to energy are properly grounded in applicable law.		(b) (5)			

		requirements of SO 3421.			
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Milestones	Due Date	Measurable Metrics
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Initiative					
Section 4.c. In addition to the review described in subparagraph (a) and (b) above, all Assistant Secretaries are hereby directed to include in their action plans the steps to be taken that would accomplish, at a minimum, the following: Actions to review all relevant internal regulations, policies, and guidance to ensure the lawful implementation of NHPA section 106					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Milestones	Due Date	Measurable Metrics			
(b) (5)					

Initiative

Section 4.c. In addition to the review described in subparagraph (a) and (b) above, all Assistant Secretaries are hereby directed to include in their action plans the steps to be taken that would accomplish, at a minimum, the following: **Actions to revise all undue burdens on the domestic mining of nonfuel minerals and actions to prioritize efforts to accelerate the ongoing, detailed geologic mapping of the United States, with a focus on locating previously unknown deposits of critical minerals.**

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Establish the United States as a leader in the production and processing of non-fuel minerals.	Outer Continental Shelf Lands Act (OCSLA) and BOEM's Implementing Regulations 30 CFR 580, 581, and 582	(b) (5)			

Milestones	Due Date	Measurable Metrics
(b)		(5)

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(b) (5)

SO 3418 Attachments:

Attachment 1: [SO3418-Attachment 1-RevokedEO-Terminated Actions.docx](#)

Attachment 2: [SO3418-Attachment2-BiOp Write Up.docx](#)

Attachment 3: [SO3418-Attachment3-High-Level Summary for National OCS Program-related actions in response to Secretarial Order 3418](#)

Attachment 4: [SO3418 – Attachment4- Draft Project Schedule for 11th National Program](#)

Attachment 5: [SO3418-Attachment5-NHPA Section 106 Review Summary](#)

Attachment 6: [SO3418-Attachment6-Critical Minerals Barrier Analysis and Mapping](#)

(b) (5)

(b) (5)

(b) (5)

(b) (5)



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

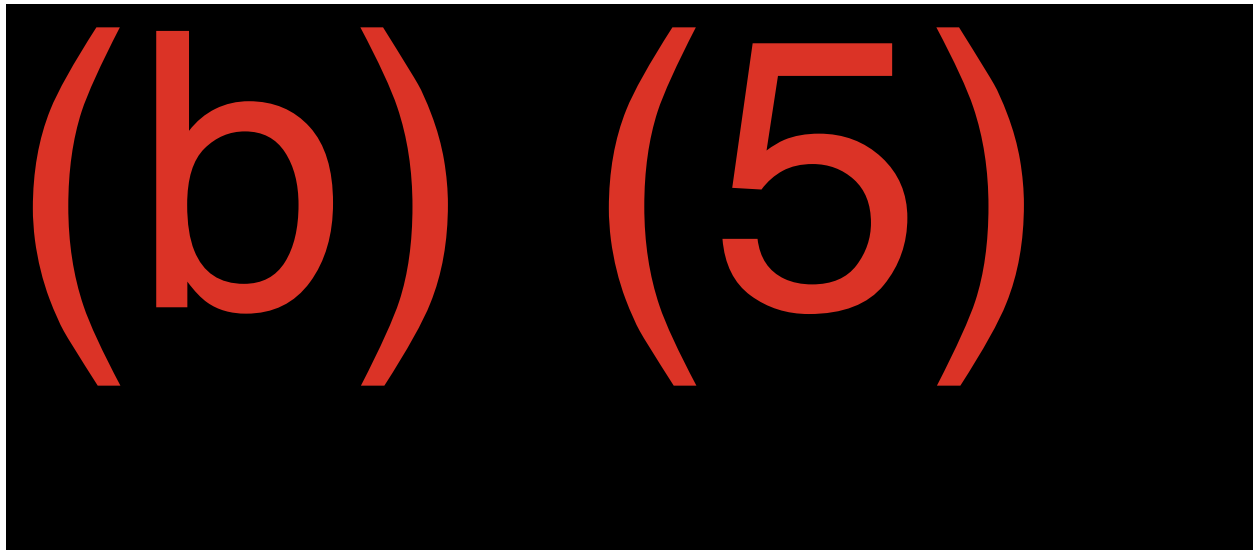
To: Cara Lee Macdonald
Chief of Staff, exercising the delegated authority of the Assistant Secretary,
Land and Minerals Management

From: Walter Cruickshank, Ph.D.
Acting Director, BOEM

Subject: SO 3418 – BOEM suggested actions to suspend, revise or rescind the “Biological Opinion on the Federally Regulated Oil and Gas program Activities in the Gulf of Mexico” (March 13, 2020) and Incidental Take Statement (April 24, 2021)

Informational Memo

Section 4(b) of SO 3418 directs a review of and action to suspend, revise, or rescind the "Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico" (March 13, 2020; 2020 BiOp) and the associated "Revised Incidental Take Statement and Revised Appendices A, C, D, and I" (April 24, 2021).



Potential Action: (b) (5) [Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

To: Cara Lee Macdonald
Chief of Staff, exercising the delegated authority of the Assistant Secretary,
Land and Minerals Management

From: Walter Cruickshank, Ph.D.
Acting Director, BOEM

Subject: High-Level Summary for National OCS Program-related actions in response to
Secretarial Order 3418, Unleashing American Energy

Informational Memo

DOI Action Plan Inputs: BOEM Draft Action Plan items regarding OCS oil and gas leasing

As part of the Departmental action plan to implement Secretarial Order 3418, BOEM is prepared to simultaneously:

1. revise the current, 2024-2029 National Outer Continental Shelf (OCS) Oil and Gas Leasing Program (National OCS Program) by considering options to accelerate the three Gulf of America (GOA) lease sales, and
2. initiate the development of a new National OCS Program to follow on or replace the current, 2024-2029 Program as soon as practicable so as to allow for consideration of additional lease sales.

BOEM has developed budget estimates for FY 2025 and FY 2026 to support the expedited development of a new (11th) National OCS Program and has developed a tentative schedule that would allow for 11th National OCS Program approval in roughly (b) (5).





United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

(b) (5)

Contact: Ben Burnett, Division Manager, Leasing Policy and Management Division, Office of Strategic Resources, Bureau of Ocean Energy Management



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

Background on Presidential and Secretarial Directives

[Executive Order \(EO\) 14154](#), titled *Unleashing American Energy*, states that it is the policy of the United States “to encourage energy exploration and production on Federal lands and waters, including on the Outer Continental Shelf, in order to meet the needs of our citizens and solidify the United States as a global energy leader long into the future...” and directs all agencies to...“develop and begin implementing action plans to suspend, revise, or rescind all agency actions identified as unduly burdensome under subsection (a) of this section, as expeditiously as possible and consistent with applicable law.”

[Secretarial Order \(SO\) 3418](#) directs DOI Assistant Secretaries to promptly review all agency actions and submit an action plan to [the Secretary] in 15 days to consider how to comply with the policies outlined in EO 14154 and SO 3418. The plan required by SO 3418 is to include steps that will be taken to *suspend, revise, or rescind* various documents, including *the Proposed Final Program, 2024-2029 National Outer Continental Shelf Oil and Gas Leasing 5-Year Plan (September 29, 2023)*. (emphasis added)

In addition to the review described in subparagraph (a) and (b) above, all Assistant Secretaries are hereby directed to include in their action plans the steps to be taken to, among other things, “*review the 5-year program for offshore oil and gas leasing to assess the need for changes to meet the Nation’s energy goals, consistent with the principles outlined in the Outer Continental Shelf Lands Act (43 U.S.C. 1331 et seq.)*.” (emphasis added)

Draft Project Schedule for the 11th National OCS Program

(b) (5)

Draft Project Schedule for the 11th National OCS Program

(b) (5)

Draft Project Schedule for the 11th National OCS Program

Key Points

(b) (5)

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United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

To: Cara Lee Macdonald
Chief of Staff, exercising the delegated authority of the Assistant Secretary,
Land and Minerals Management

From: Walter Cruickshank, Ph.D.
Acting Director, BOEM

Subject: Summary of BOEM's review of relevant regulations, policy and guidance to insure the lawful implementation of Section 106 of the National Historic Preservation Act" (NHPA)

Informational Memo

DOI Secretarial Order 3418: Unleashing American Energy Section 4c. instructs bureaus to take "... actions to review all relevant internal regulations, policies, and guidance to ensure the lawful implementation of section 106 of the National Historic Preservation Act" (NHPA). The below table lays out the regulations, policy, and guidance reviewed by BOEM and provides a summary of whether BOEM determined each item represents a lawful implementation of Section 106.

Document	Number	Type	Lawful Implementation of Section 106
(b) (5)			



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(b) (5)

(b) (5)



United States Department of the Interior

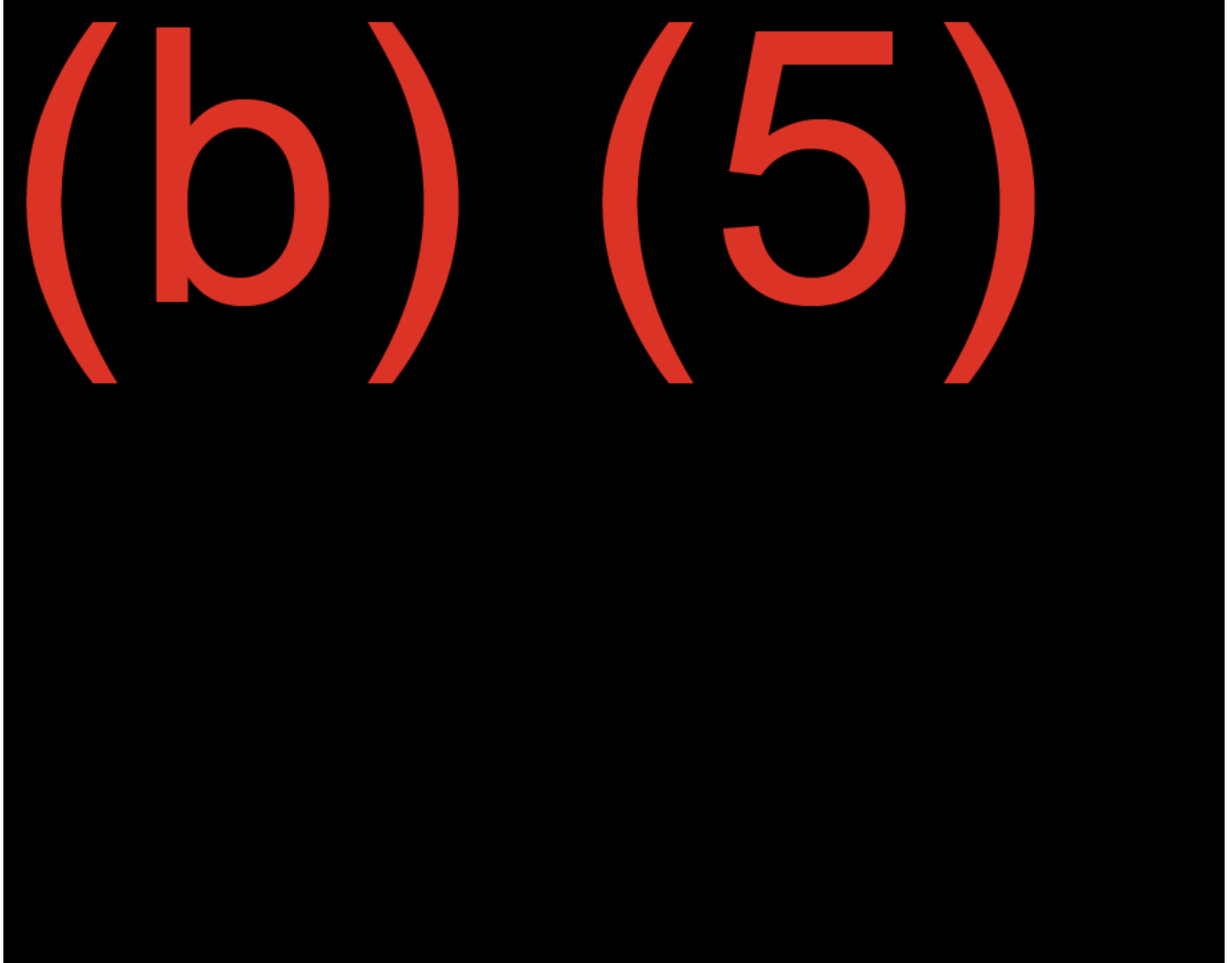
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(b) (5)



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United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

To: Cara Lee Macdonald
Chief of Staff, exercising the delegated authority of the Assistant Secretary,
Land and Minerals Management

From: Walter Cruickshank, Ph.D.
Acting Director, BOEM

Subject: BOEM High Level Summary - Action Plan Related to Secretarial Order 3418 -
Unleashing American Energy

Informational Memo

This document presents BOEM's initial action plan required by Section 4(c) regarding (1) potential actions **reduce undue barriers and burdens** on domestic mining and processing of marine minerals (including critical minerals), (2) actions that would **accelerate the ongoing, detailed geologic mapping** of the U.S., with a focus on locating previously unknown deposits of OCS critical minerals.

1. Reducing Undue Barriers and Burdens

(b) (5)

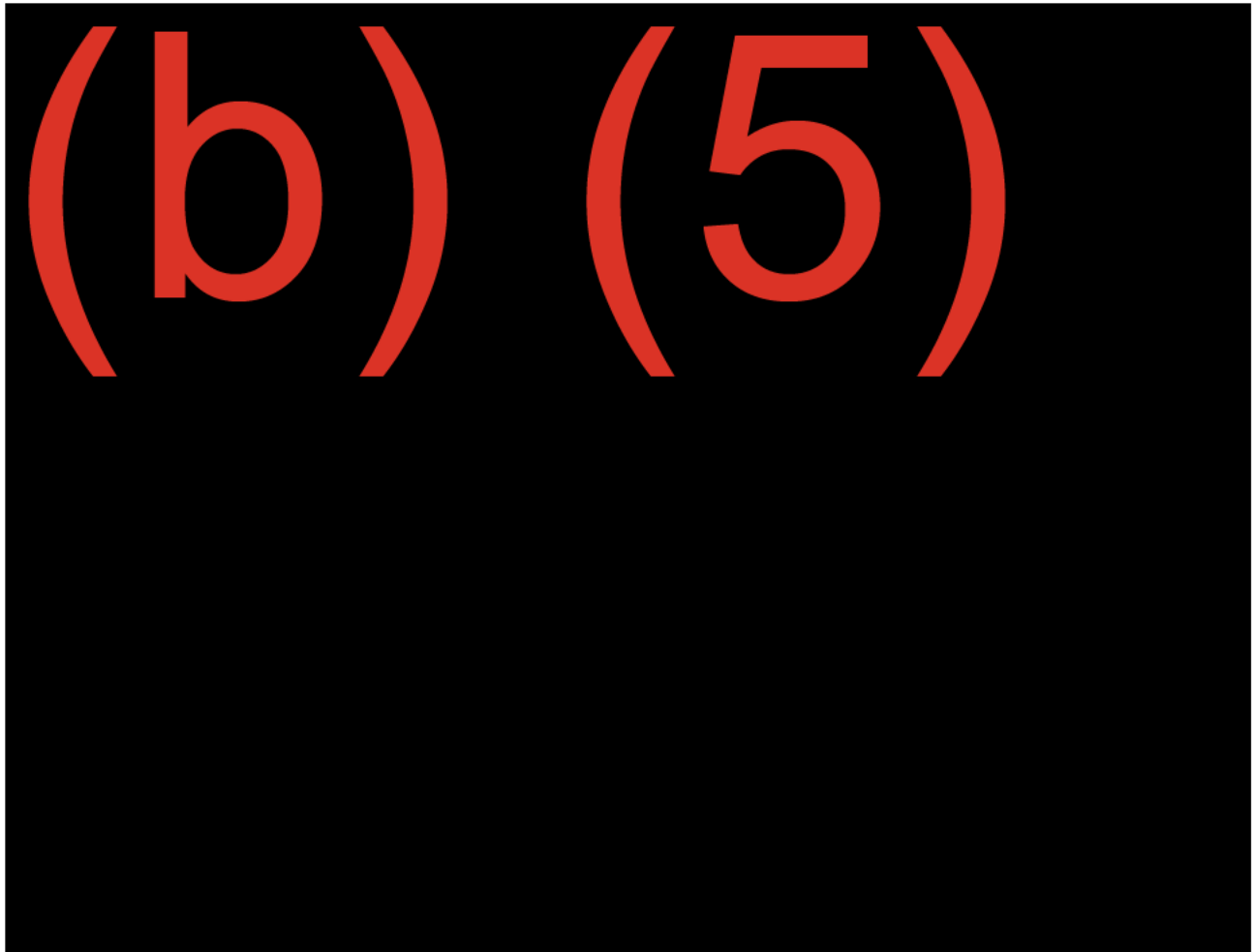


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WASHINGTON, DC 20240-0001



2. Accelerating Geologic Mapping of Critical Minerals in the Marine Environment





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WASHINGTON, DC 20240-0001

(b) (5)

Contact: Jeffrey Reidenauer, Ph.D., Division Manager, Marine Minerals Division, Office of Strategic Resources, Bureau of Ocean Energy Management

**Bureau of Safety and Environmental
Enforcement
(BSEE)**



United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

February 13, 2025

Memorandum

To: Cara Lee Macdonald
Chief of Staff, Exercising the Delegated Authorities of
the Assistant Secretary, Land and Minerals Management

From: Paul P. Huang
Acting Director
Bureau of Safety and Environmental Enforcement

Subject: Action Plan for Secretarial Order 3418 - Unleashing American Energy

In accordance with Secretarial Order 3418 – Unleashing American Energy, issued by Secretary Burgum on February 3, 2025, the Bureau of Safety and Environmental Enforcement (BSEE) has prepared the following action plan to support the United States’ capacity to provide affordable and reliable energy according to President Trump’s January 20, 2025, Executive Order 14154 also titled Unleashing American Energy. A cross-bureau team reviewed all agency actions subject to the directives in Section 4 of Secretary’s Order 3418 to create an action plan that is both pursuable within BSEE’s authorities and consistent with Executive Order 14154 priorities.

Top Priorities



Additional Information

The additional information below provides context for actions in the BSEE action plan related to the "Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico" (March 13, 2020; 2020 BiOp) and the associated "Revised Incidental Take Statement and Revised Appendices A, C, D, and I" (April 24, 2021) as well as pending litigation. BSEE is also proposing innovative actions to improve energy and critical minerals permitting, development, and production. These additional actions require coordination with other federal and state agencies to evaluate their potential and to develop their implementation strategy.

(b) (5)



We stand ready to support the requests for more information on this action plan, including the approval of the above recommendations. Please let me or BSEE's Chief of Staff, Wes James (Weston.James@bsee.gov) know if you have any questions.

cc: Acting Director, BOEM

Table 1 - Regulatory Review
Action Plan for SO 3418 - Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Assistant Secretary for Land and Minerals Management				
Submitted By	Bureau of Safety and Environmental Enforcement				
Initiative					
Section 4(a): Take all necessary steps to ensure any actions taken to implement the revoked EOs are terminated, including but not limited to terminating any contract or agreement on behalf of entities or programs abolished in the revoked EOs; Section 4(b): In addition to the review described in subparagraph (a) above, all Assistant Secretaries should include in the plan required by this section steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to: the following [see SO for list] regulations, Secretary's Orders, Solicitor's Opinions, Instruction Memoranda, and Departmental Manuals.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Ensure that all regulatory requirements related to energy are grounded in clearly applicable law	43 U.S.C. 1457 43 U.S.C. 1331 et seq.	(b) (5)			
Milestones				Due Date	Measurable Metrics
(b) (5)					

Table 1 - Regulatory Review
Action Plan for SO 3418 - Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		

Table 2 – Bureau Directive Review
Action Plan for SO 3418 - Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Assistant Secretary for Land and Minerals Management				
Submitted By	Bureau of Safety and Environmental Enforcement				
Initiative					
<p>Section 4(a): Take all necessary steps to ensure any actions taken to implement the revoked EOs are terminated, including but not limited to terminating any contract or agreement on behalf of entities or programs abolished in the revoked EOs;</p> <p>Section 4(b): In addition to the review described in subparagraph (a) above, all Assistant Secretaries should include in the plan required by this section steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to: the following [see SO for list] regulations, Secretary's Orders, Solicitor's Opinions, Instruction Memoranda, and Departmental Manuals; and</p> <p>Section 4(c): In addition to the review described in subparagraph (a) and (b) above, all Assistant Secretaries are hereby directed to include in their action plans the steps to be taken that would accomplish, at a minimum, the following actions [see SO for list].</p>					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Bureau policies and directives comply with current Executive Orders, Secretary's Orders, and departmental directives.	43 U.S.C. 1457	(b) (5)			
Milestones			Due Date	Measurable Metrics	
(b) (5)					

Table 2 – Bureau Directive Review
Action Plan for SO 3418 - Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		

Table 2 – Bureau Directive Review
Action Plan for SO 3418 - Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		

Table 3 – Operations
Action Plan for SO 3418 - Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Assistant Secretary for Land and Minerals Management				
Submitted By	Bureau of Safety and Environmental Enforcement				
Initiative					
Section 4(a): Take all necessary steps to ensure any actions taken to implement the revoked EOs are terminated, including but not limited to, terminating any contract or agreement on behalf of entities or programs abolished in the revoked EOs; Section 4(b): In addition to the review described in subparagraph (a) above, all Assistant Secretaries should include in the plan required by this section steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to, the following [see SO for list] regulations, Secretary's Orders, Solicitor's Opinions, Instruction Memoranda, and Departmental Manuals; and Section 4(c): In addition to the review described in subparagraph (a) and (b) above, all Assistant Secretaries are hereby directed to include in their action plans the steps to be taken that would accomplish, at a minimum, the following actions [see SO for list].					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Ensure an abundant supply of reliable energy is readily accessible for the United States.	43 U.S.C. 1331 et seq. 30 CFR 250 Subpart E 30 CFR 250.101(b)(1)	(b) (5)			
Milestones				Due Date	Measurable Metrics
(b) (5)					

Table 3 – Operations
Action Plan for SO 3418 - Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		

Table 3 – Operations
Action Plan for SO 3418 - Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		

Table 4 – Collaboration
Action Plan for SO 3418 - Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Assistant Secretary for Land and Minerals Management				
Submitted By	Bureau of Safety and Environmental Enforcement				
Initiative					
Section 4(b): In addition to the review described in subparagraph (a) above, all Assistant Secretaries should include in the plan required by this section steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to the following [see SO for list] regulations, Secretary's Orders, Solicitor's Opinions, Instruction Memoranda, and Departmental Manuals; and Section 4(c): In addition to the review described in subparagraph (a) and (b) above, all Assistant Secretaries are hereby directed to include in their action plans the steps to be taken that would accomplish, at a minimum, the following actions [see SO for list].					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Encourage energy and nonfuel mineral production on the OCS. Provide opportunities for public comment. Provide opportunities for rigorous, peer-reviewed scientific analysis.	43 U.S.C. 1331 et seq. 43 U.S.C. 1345 Section 20	(b) (5)			
Milestones			Due Date	Measurable Metrics	
(b) (5)					

Table 3 – Operations
Action Plan for SO 3418 - Unleashing American Energy

Milestones	Due Date	Measurable Metrics
A large black rectangular redaction box covers the entire content area of the table. In the center of this box, the text "(b) (5)" is written in a large, bold, red font. The "b" and "5" are lowercase and enclosed in parentheses, respectively.		

**Office of Surface Mining Reclamation
and Enforcement
(OSMRE)**

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3418 – Unleashing American Energy

Summary: Provide summary of action plan to accomplish the policy goals for this SO.

Top priorities: List up to the top 5 priorities for this SO and provide justification for each recommendation.

Additional Information: Provide any other additional information that needs to be considered to successfully implement this action plan.

Assistant Secretary for Land and Minerals Management Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Office of Surface Mining Reclamation and Enforcement				
Initiative					
Sec 4(b). In addition to the review described in subparagraph (a) above, all Assistant Secretaries should include in the plan required by this section, steps that, as appropriate, will be taken to suspend, revise, or rescind documents, including but not limited to, the following regulations, Secretary's Orders (SO), Solicitor's Opinions, Instruction Memoranda (IM), and Departmental Manuals (DM): "Ten-Day Notices and Corrective Action for State Regulatory Program Issues," 89 Fed. Reg. 24714 (April 9, 2024)					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Ensuring that all regulatory requirements related to energy are grounded in clearly applicable law	30 U.S.C. 1271(a)	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b)		(5)	(5)		

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Office of Surface Mining Reclamation and Enforcement				
Initiative					
Sec 4(c). In addition to the review described in subparagraph (a) and (b) above, all Assistant Secretaries are hereby directed to include in their action plans the steps to be taken that would accomplish, at a minimum, the following: actions to review all relevant internal regulations, policies, and guidance to ensure the lawful implementation of section 106 of the National Historic Preservation Act (NHPA)					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Ensure expedited compliance with section 106 of the NHPA	16 U.S.C. § 470f	(b)	(5)		
Milestones		Due Date	Measurable Metrics		
(b)			(5)		

Assistant Secretary for Land and Minerals Management Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Office of Surface Mining Reclamation and Enforcement				
Initiative					
Sec. 1. Purpose. This Order implements provisions of President Trump's January 20, 2025, Executive Order (EO) 14154, titled "Unleashing American Energy," which directs the removal of impediments imposed on the development and use of our Nation's abundant energy and natural resources by the Biden administration's burdensome regulations.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Ensure expedited compliance with the Endangered Species Act (ESA)	16 U.S.C. § 1531-1544; 30 U.S.C. §§ 1257(c)(1)(F), 1265(b)(17), 1266(b)(11), 1267	(b)	(5)		
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418-Unleashing American Energy				
Accountable	Office of Surface Mining Reclamation and Enforcement				
Initiative					
Sec. 1. Purpose. This Order implements provisions of President Trump's January 20, 2025, Executive Order (EO) 14154, titled "Unleashing American Energy," which directs the removal of impediments imposed on the development and use of our Nation's abundant energy and natural resources by the Biden administration's burdensome regulations.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Expediting the permitting process for actions that OSMRE has determined do not have significant effects on the human environment.	42 U.S.C. §§ 4321 et seq. 42 U.S.C. § 4336c 43 C.F.R. § 46.205	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b)		(5)			

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Office of Surface Mining Reclamation and Enforcement				
Initiative					
Sec 4(a)Take all necessary steps to ensure any actions taken to implement the revoked EOs are terminated, including but not limited to, terminating any contract or agreement on behalf of entities or programs abolished in the revoked EOs					
Policy goal(s)	Legal Authority	Recommendations	Barriers to Overcome	Metrics for Success	Final Due Date
Terminate all guidance/ directives that align with revoked EOs. Ensure all future guidance /directives incorporate language as outlined in EO/SO.	EO 14154	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

**SO 3419 - Delivering Emergency Price
Relief for American Families and
Defeating the Cost-of-Living Crisis**

ASLM Action Plans Pursuant to SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

POLICY GOALS

Bureau of Land Management (BLM)

- Identify regulations, programs, and processes that may increase costs for the American people and take steps to lower costs

Bureau of Ocean Energy Management (BOEM)

- Identify "climate" policies that increase the cost of food or energy

Bureau of Safety and Environmental Enforcement (BSEE)

- Ensuring that BSEE promptly identifies appropriate actions to cut red tape that will reduce costs for Americans

Office of Surface Mining Reclamation and Enforcement (OSMRE)

- Create employment opportunities for American workers, including drawing discouraged workers into the labor force and reduce labor underutilization
- Expedite authorization for Abandoned Mine Lands (AML) construction projects to support the labor force and reduce labor underutilization

**Bureau of Land Management
(BLM)**

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Summary: Section 4 of Secretary’s Order (SO) 3419 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, with a particular focus on policies that raise the cost of food or energy. The review shall also address employment opportunities for American workers.

Section 5(b) of the SO also requires all bureaus and offices to report the results of the review required in Section 4 and complete implementation actions, including modifications to policies, procedures, or practices that are inconsistent with the January 20, 2025, Presidential Memorandum titled “Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis” (Cost-of-Living Memo), which requires that the Department of the Interior (DOI) promptly identify appropriate actions to cut red tape that will reduce costs for Americans.

Top priorities:



Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis



Additional Information: (b) (5)

[Redacted text block consisting of multiple lines of blacked-out content]

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419 – <i>Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</i>				
Accountable	Bureau of Land Management				
Initiative					
Section 4 of SO 3419 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, and Section 5(b) requires completion of any implementation actions. The BLM is developing a briefing paper for each of the following existing regulations to identify options for what provisions to revise to address SO 3419, cut red tape, and reduce costs. Upon receiving Department direction based on the options identified, the Bureau will prepare a schedule for revising the regulations and any associated Instruction Memoranda, manuals, or handbooks.					
(b) (5)					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify regulations that may increase costs for the American people and take steps to lower costs.	5 U.S.C. § 553 (to revise the rules).	(b) (5)			

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

			(b) (5)		(b) (5)
Milestones	Due Date	Measurable Metrics			
(b) (5)					

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419 – <i>Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</i>				
Accountable	Bureau of Land Management				
Initiative					
Section 4 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, and Section 5(b) requires completion of any implementation actions. The BLM is implementing more efficient grazing practices such as the use of new technologies on public lands including virtual fencing and electronic cattle collars, which can reduce costs to grazing lessees and permit holders for building and maintaining fences and other infrastructure, as well as reduce time off public lands resulting from wildland fires. This includes developing standardized resource data, analyses, and tools to implement land health and accelerate the permitting process for authorizing grazing on BLM lands.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify programs and processes that may increase costs for the American people and take steps to lower costs.	Taylor Grazing Act, 43 USC 315 et seq., Federal Land Policy and Management Act (FLPMA), (43 USC 1701 et seq.), Public Rangeland Improvement Act, (PRIA) (43 USC 1901 et seq)	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

(b) (5)

Responsive to	SO 3419 – <i>Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</i>				
Accountable	Bureau of Land Management				
Initiative					
Section 4 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, and Section 5(b) requires completion of any implementation actions. The BLM is reducing lengthy regulatory processes and associated costs by identifying and adopting other agency Categorical Exclusions (CXs) for actions (b) (5)					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify programs and processes that may increase costs for the American people and take steps to lower costs.	National Environmental Policy Act (NEPA)	(b) (5)	(b) (5)		

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Milestones	Due Date	Measurable Metrics
(b) (5)		

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419 – <i>Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</i>				
Accountable	Bureau of Land Management				
Initiative					
Section 4 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, and Section 5(b) requires completion of any implementation actions. The BLM is (b) (5)					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify programs and processes that may increase costs for the American people and take steps to lower costs.	NEPA	(b) (5)			

Title: Assistant Secretary for Land and Minerals Management for Secretary's Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Milestones	Due Date	Measurable Metrics
(b) (5)		

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419 – <i>Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</i>				
Accountable	Bureau of Land Management				
Initiative					
Section 4 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, and Section 5(b) requires completion of any implementation actions. The BLM is (b) (5)					
[Redacted]					
[Redacted]					
[Redacted]					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify programs and processes that may increase costs for the American people and take steps to lower costs.	O&C Act FLPMA NEPA	(b)	(5)	[Redacted]	[Redacted]
Milestones			Due Date	Measurable Metrics	
(b)			(5)	[Redacted]	

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419 – <i>Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</i>
Accountable	Bureau of Land Management

Initiative

Section 4 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, and Section 5(b) requires completion of any implementation actions. The BLM is undertaking the process of (b) (5) [REDACTED]

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify programs and processes that may increase costs for the American people and take steps to lower costs.	Endangered Species Act	(b) (5)	(b) (5)		

Milestones	Due Date	Measurable Metrics
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(b) (5)

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

		established under 16 USC 6592a(b)(1)(A)(ii) for Stewardship contracting			
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Milestones	Due Date	Measurable Metrics
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Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419 – <i>Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</i>				
Accountable	Bureau of Land Management				
Initiative					
Section 4 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, and Section 5(b) requires completion of any implementation actions. The BLM is developing (b) (5) [Redacted]					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify programs and processes that may increase costs for the American people and take steps to lower costs.	FLPMA, SNPLMA, R&PP, and any other relevant authorities.	(b) (5)			

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Milestones	Due Date	Measurable Metrics
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Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419 – <i>Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</i>				
Accountable	Bureau of Land Management				
Initiative					
Section 4 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans, and Section 5(b) requires completion of any implementation actions. Section 4 requires all bureaus and offices to conduct a review of programs and regulations to identify any that may cause higher costs for Americans and Section 5(b) requires completion of any implementation actions. The Bureau is (b) (5)					
[Redacted]					
[Redacted]					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify programs and processes that may increase costs for the American people and take steps to lower costs.	43 CFR, 3600 Mineral Materials Disposal	(b) (5)			
Milestones				Due Date	Measurable Metrics
(b) (5)					

Title: Assistant Secretary for Land and Minerals Management for Secretary’s Order 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Milestones	Due Date	Measurable Metrics
(b) (5)		

**Bureau of Ocean Energy Management
(BOEM)**

Assistant Secretary – Land and Minerals Management Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419 - Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
Accountable	BOEM				
Initiative					
Section 4. The Department's Bureaus and Offices shall promptly conduct a review of their programs and regulations to identify those that may result in higher costs for the American people. While this review must broadly consider the effects of Departmental policies and decisions that directly or indirectly increase costs of housing, healthcare, and home appliances, it should particularly focus on coercive "climate" policies that increase the cost of food or energy. It shall also consider how to create employment opportunities for American workers, including drawing discouraged workers into the labor force. The Bureaus and Offices shall report the results of their review, along with recommendations for prompt action, to address identified problems within 15 days of the date of this Order.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify "climate" policies that increase the cost of food or energy	Inflation Reduction Act Section 50261: Increases the minimum royalty rate for new offshore fossil fuel leases from 12.5% to 16 and 2/3%; sets a maximum royalty rate of 18 and 3/4% for new offshore oil and gas leases for 10 years	(b) (5)			

		(b) (5)		
Milestones	Due Date	Measurable Metrics		
(b) (5)				

Attachments:

Attachment 1: [BOEM Analysis of SO3419](#)



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

(b) (5)



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

(b) (5)



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

(b) (5)

**Bureau of Safety and Environmental
Enforcement
(BSEE)**



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

February 13, 2025

Memorandum

To: Cara Lee Macdonald
Chief of Staff, Exercising the Delegated Authorities of
the Assistant Secretary, Land and Minerals Management

From: Paul P. Huang
Acting Director
Bureau of Safety and Environmental Enforcement

Subject: Action Plan to Implement Secretarial Order 3419 - Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Summary

In accordance with Secretarial Order (SO) 3419, “Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis,” issued by Secretary Burgum on February 3, 2025, the Bureau of Safety and Environmental Enforcement (BSEE) prepared the following action plan to ensure the efficient and timely implementation of the January 20, 2025, Presidential Memorandum on “Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis,” (Cost-of-Living Memo). A cross-bureau team reviewed all agency actions subject to the directives in Section 4 of SO 3419 to create an action plan pursuable within BSEE’s authorities and consistent with the Cost-of-Living Memo.

Top Priorities

- **Review programs and regulations.** Consistent with the BSEE review for SO 3418, “Unleashing American Energy,” review BSEE programs and regulations to consider potential direct or indirect increased cost for energy.

Additional Information



DRAFT//DELIBERATIVE

(b) (5)

We stand ready to support the requests for more information on this strategy, including the approval of the included priority goal and recommendations. Please let me or BSEE's Chief of Staff, Wes James (Weston.James@bsee.gov) know if you have any questions.

cc: Acting Director, BOEM



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
 WASHINGTON, DC 20240-0001

Table 1

Responsive to	SO 3419 - Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
Accountable	Assistant Secretary for Land and Minerals Management				
Submitted by	Bureau of Safety and Environmental Enforcement				
Initiative					
Section 4: The Department's Bureaus and Offices shall promptly conduct a review of their programs and regulations to identify those that may result in higher costs for the American people. While this review must broadly consider the effects of Departmental policies and decisions that directly or indirectly increase costs of housing, healthcare, and home appliances, it should particularly focus on coercive "climate" policies that increase the cost of food or energy. It shall also consider how to create employment opportunities for American workers, including drawing discouraged workers into the labor force. The Bureaus and Offices shall report the results of their review, along with recommendations for prompt action, to address identified problems within 15 days of the date of this Order.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Ensuring that the Department of the Interior (Department) promptly identifies appropriate actions to cut red tape that will reduce costs for Americans.	Section 2 of Reorganization Plan No. 3 of 1950 (64 Stat. 1262), as amended.	(b)	(5)		
Milestones	Due Date	Measurable Metrics			
(b)	(5)				

**Office of Surface Mining Reclamation
and Enforcement
(OSMRE)**

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Summary: Provide summary of action plan to accomplish the policy goals for this SO.

Top priorities: List up to the top 5 priorities for this SO and provide justification for each recommendation.

Additional Information: Provide any other additional information that needs to be considered to successfully implement this action plan.

Assistant Secretary for Land and Minerals Management Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419– Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
Accountable	Office of Surface Mining Reclamation and Enforcement				
Initiative					
<p>Sec. 4. Implementation. The Department's Bureaus and Offices shall promptly conduct a review of their programs and regulations to identify those that may result in higher costs for the American people. While this review must broadly consider the effects of Departmental policies and decisions that directly or indirectly increase costs of housing, healthcare, and home appliances, it should particularly focus on coercive "climate" policies that increase the cost of food or energy. It shall also consider how to create employment opportunities for American workers, including drawing discouraged workers into the labor force. The Bureaus and Offices shall report the results of their review, along with recommendations for prompt action, to address identified problems within 15 days of the date of this Order.</p>					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Create employment opportunities for American workers, including drawing discouraged workers into the labor force and reduce labor underutilization	30 USC 1231a(f); Annual Appropriations Acts FY 2016-2023	(b) (5)			
Milestones	Due Date		Measurable Metrics		
(b) (5)					

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	SO 3419– Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
Accountable	Office of Surface Mining Reclamation and Enforcement				
Initiative					
<p>Sec. 4. Implementation. The Department's Bureaus and Offices shall promptly conduct a review of their programs and regulations to identify those that may result in higher costs for the American people. While this review must broadly consider the effects of Departmental policies and decisions that directly or indirectly increase costs of housing, healthcare, and home appliances, it should particularly focus on coercive "climate" policies that increase the cost of food or energy. It shall also consider how to create employment opportunities for American workers, including drawing discouraged workers into the labor force. The Bureaus and Offices shall report the results of their review, along with recommendations for prompt action, to address identified problems within 15 days of the date of this Order.</p>					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
(b) (5)					
Milestones	Due Date	Measurable Metrics			

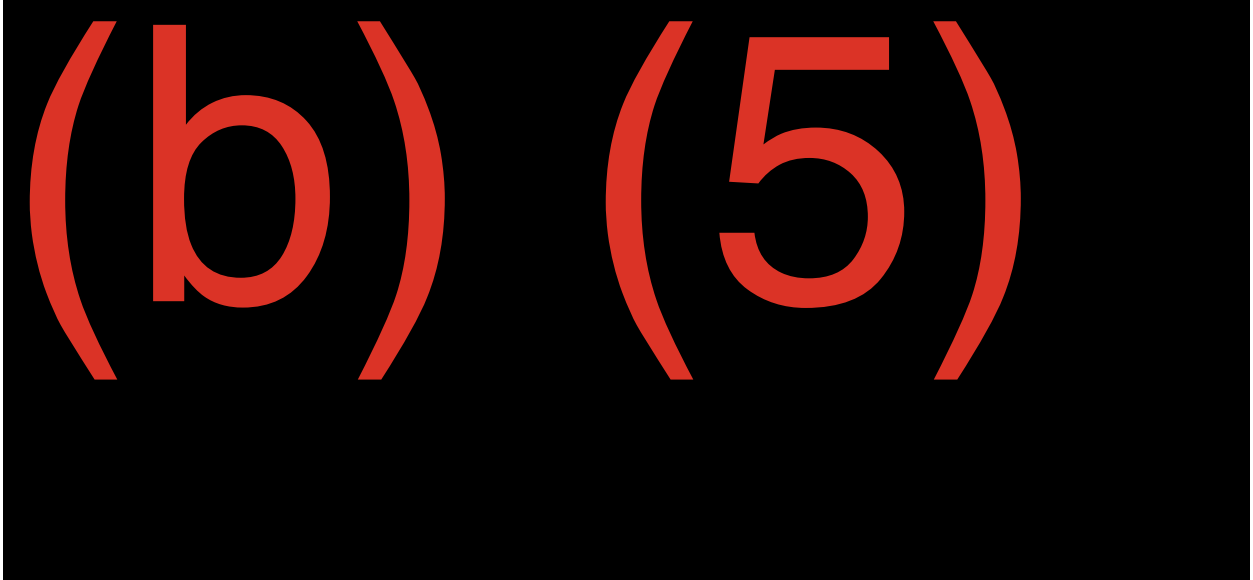
(b) (5)

**SO 3420 - Announcing President
Trump's Revocation of Former Outer
Continental Shelf Withdrawals**

ASLM Action Plans Pursuant to SO 3420 - Announcing President Trump's Revocation of Former Outer Continental Shelf Withdrawals

ACTION ITEMS

Bureau of Safety and Environmental Enforcement (BSEE)



**Bureau of Safety and Environmental
Enforcement
(BSEE)**



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

February 13, 2025

Memorandum

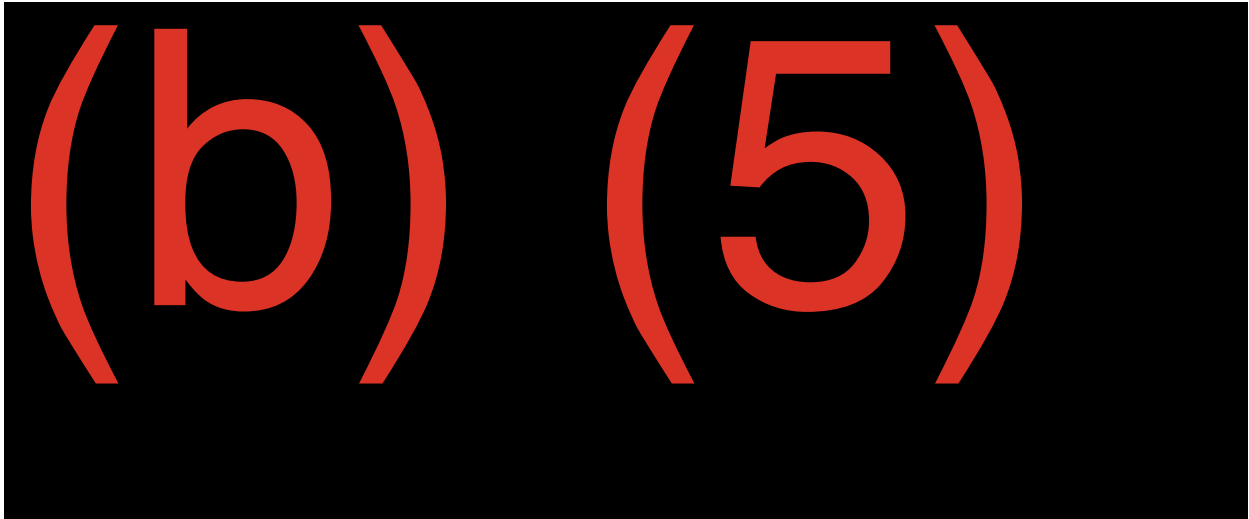
To: Cara Lee Macdonald
Chief of Staff, Exercising the Delegated Authorities of
the Assistant Secretary, Land and Minerals Management

From: Paul P. Huang
Acting Director
Bureau of Safety and Environmental Enforcement

Subject: Strategy to Implement Secretarial Order 3420, “Announcing President Trump's Revocation of Former Outer Continental Shelf Withdrawals”

As our bureau continues to advance safety and environmental protection related to energy development on the U.S. Outer Continental Shelf (OCS), BSEE will ensure the efficient and timely implementation of President Trump's January 20, 2025, Executive Order (EO), “Initial Rescissions of Harmful Executive Orders and Actions.”

In accordance with Secretarial Order (SO) 3420, “Announcing President Trump's Revocation of Former Outer Continental Shelf Withdrawals,” issued by Secretary Burgum on February 3, 2025, BSEE will implement the following steps:



Our bureau remains committed to maintaining the safe, reliable, and diversified supply of energy for our Nation. We stand ready to support the requests for more information on this strategy, including the approval of the above recommendations. Please let me or BSEE’s Chief of Staff, Wes James (Weston.James@bsee.gov), know if you have any questions.

cc: Acting Director, BOEM

SO 3421 - Achieving Prosperity through Deregulation

ASLM Action Plans Pursuant to SO 3421 - Achieving Prosperity through Deregulation

ACTION ITEMS

Bureau of Safety and Environmental Enforcement (BSEE)

- Pause current regulatory activity to await the updated guidance—consistent with the SO and corresponding EO—from the Office of Management and Budget (OMB) and the DOI Office of the Executive Secretariat and Regulatory Affairs (OES)
- Once guidance is received, ensure timely documentation of our bureau's steps for ensuring consistent application of this guidance to any BSEE regulatory action

**Bureau of Safety and Environmental
Enforcement
(BSEE)**



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

February 13, 2025

Memorandum

To: Cara Lee Macdonald
Chief of Staff, Exercising the Delegated Authorities of
the Assistant Secretary, Land and Minerals Management

From: Paul P. Huang
Acting Director
Bureau of Safety and Environmental Enforcement

Subject: Strategy to Implement Secretarial Order 3420, “Announcing President Trump's
Revocation of Former Outer Continental Shelf Withdrawals”

As our bureau continues to advance safety and environmental protection related to energy development on the U.S. Outer Continental Shelf (OCS), BSEE will ensure the efficient and timely implementation of President Trump's January 20, 2025, Executive Order (EO), “Initial Rescissions of Harmful Executive Orders and Actions.”

In accordance with Secretarial Order (SO) 3420, “Announcing President Trump's Revocation of Former Outer Continental Shelf Withdrawals,” issued by Secretary Burgum on February 3, 2025, BSEE will implement the following steps:



Our bureau remains committed to maintaining the safe, reliable, and diversified supply of energy for our Nation. We stand ready to support the requests for more information on this strategy, including the approval of the above recommendations. Please let me or BSEE’s Chief of Staff, Wes James (Weston.James@bsee.gov), know if you have any questions.

cc: Acting Director, BOEM

ASLM Action Plans Pursuant to SO 3421 - Achieving Prosperity through Deregulation

ACTION ITEMS

Bureau of Safety and Environmental Enforcement (BSEE)

- Pause current regulatory activity to await the updated guidance—consistent with the SO and corresponding EO—from the Office of Management and Budget (OMB) and the DOI Office of the Executive Secretariat and Regulatory Affairs (OES)
- Once guidance is received, ensure timely documentation of our bureau's steps for ensuring consistent application of this guidance to any BSEE regulatory action

**Bureau of Safety and Environmental
Enforcement
(BSEE)**



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

February 13, 2025

Memorandum

To: Cara Lee Macdonald
Chief of Staff, Exercising the Delegated Authorities of
the Assistant Secretary, Land and Minerals Management

From: Paul P. Huang
Acting Director
Bureau of Safety and Environmental Enforcement

Subject: Strategy to Implement Secretarial Order 3421, “Achieving Prosperity through
Deregulation”

As our bureau continues to advance safety and environmental protection related to energy development on the U.S. Outer Continental Shelf (OCS), it is imperative that our organization ensure the efficient and timely implementation of President Trump's January 20, 2025, Executive Order (EO), “Unleashing Prosperity Through Deregulation.”

In accordance with the Secretarial Order (SO) 3421, “Achieving Prosperity through Deregulation,” issued by Secretary Burgum on February 3, 2025, BSEE will communicate the contents of SO 3421 to bureau staff.

BSEE also recognizes the importance of consistency with any updated guidance from the Office of Management and Budget (OMB) and the DOI Office of the Executive Secretariat and Regulatory Affairs (OES) that will provide consistency with the EO and SO. As such, BSEE will pause current regulatory activity to await the respective OMB and OES guidance. Once received, BSEE will ensure timely documentation of our bureau’s steps for ensuring consistent application of this guidance to any BSEE regulatory action.

Our bureau remains committed to ensuring the safe, reliable, and diversified supply of energy for our Nation. We stand ready to support the requests for more information on this strategy, including the approval of the above recommendations. Please let me or BSEE’s Chief of Staff, Wes James (Weston.James@bsee.gov), know if you have any questions.

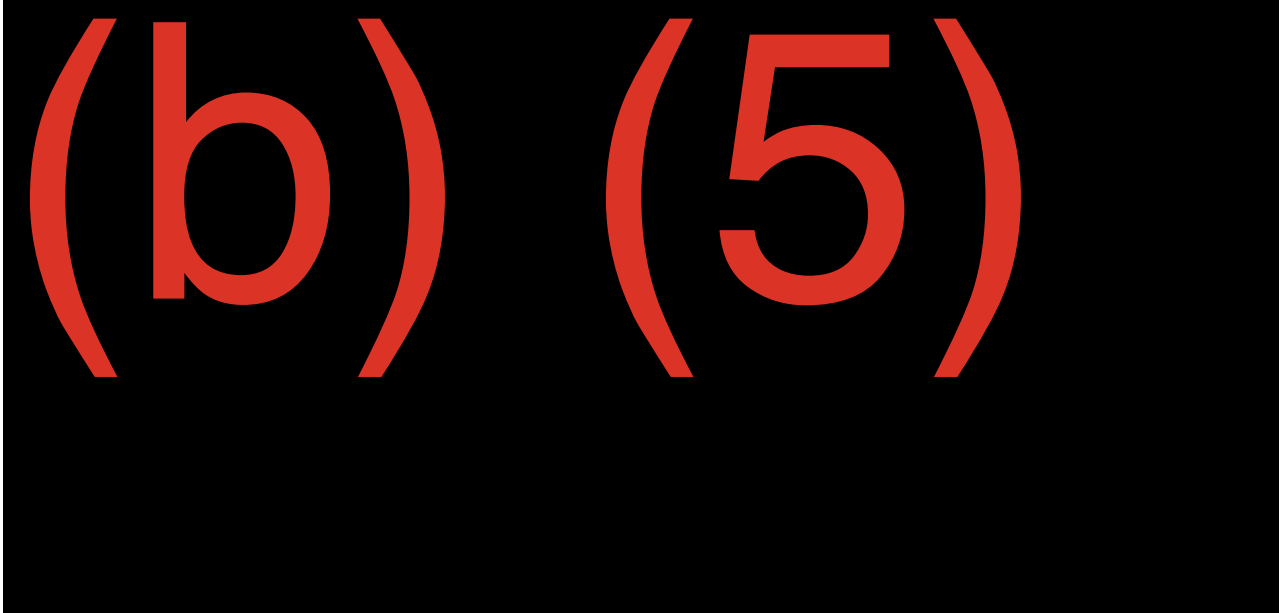
cc: Acting Director, BOEM

**SO 3422 - Unleashing Alaska's
Extraordinary Resource Potential**

ASLM Action Plans Pursuant to SO 3422 - Unleashing Alaska's Extraordinary Resource Potential

POLICY GOALS

Bureau of Land Management (BLM)



Bureau of Safety and Environmental Enforcement (BSEE)



**Bureau of Land Management
(BLM)**

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

Summary: In response to Secretary's Order 3422, this draft action plan identifies options to implement provisions from Executive Order (EO) 14153, including Sec. 3(b)(vii) directing the BLM to evaluate changes to, including the potential rescission of Public Land Order 5150, and any subsequent amendments, modifications, or corrections to it; Sec. 3(b)(viii) directing the BLM to review the 2024 Ambler Road Final Supplemental EIS (SEIS), analyze any deficiencies, and reinstate the 2020 ROD; and (xvii-xviii) directing the BLM to rescind the Central Yukon Record of Decision (ROD) and approved Resource Management Plan (RMP) signed on November 12, 2024 and reimplement the Central Yukon Draft RMP/EIS dated December 11, 2020.

Top priorities:

(b) (5)

Additional Information:

EO 14153 Section 3(b)(vii) directs the evaluation of changes to, including partial or full revocation of PLO 5150, which reserved approximately 5.3 million acres of Federal land in Alaska for the purpose of supporting a utility and transportation corridor in the aid of programs for the U.S. Government and the State of Alaska (36 Fed. Reg. 25,410 (December 31, 1971)) under authorities granted in the Alaska Native Claims Settlement Act (ANCSA), section 17(c). This corridor runs from Prudhoe Bay at the north end of the State to the port of Valdez in southcentral Alaska. Many of the Federal lands withdrawn by PLO 5150 are subject to other withdrawals, including ANCSA 17(d)(1) withdrawals. Any decision to revoke PLO 5150 would need to consider the application of public land laws through overlapping withdrawals.

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

Responsive to:	SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis and associated Presidential Memorandum of January 20, 2025 SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential and associated Executive Order 14153 (Sections 3(a)(i)-(ii); 3(b)(vii), (xvii)-(xviii), (xxiii))				
Accountable	Bureau of Land Management				
Initiative					
Evaluate revocation or modification of Public Land Order 5150.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Implement EO 14153; reduce costs, bureaucracy, and undue burdens on the public and energy transmission	ANCSA FLPMA	(b)	(5)	(5)	
Milestones		Due Date		Measurable Metrics	
(b)		(5)			

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

Responsive to	SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Section 3(b)(viii))				
Accountable	Bureau of Land Management				
Initiative					
Replace the 2024 Ambler ROD in an efficient, timely, and legally sustainable way. The approach to PLO 5150 described above lends itself to					
(b) (5)					
[REDACTED]					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Efficiently and effectively maximize the development and production of the natural resources located on both Federal and State lands within Alaska.	ANILCA FLPMA	(b)	(5)		
Milestones		Due Date	Measurable Metrics		
(b)		(5)			

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

Responsive to	SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Sections 3(b)(xvii)-(xviii))				
Accountable	Bureau of Land Management				
Initiative					
Amend/revise the Central Yukon Approved RMP/ROD.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Implement EO 14153 Sections 3(b) (xvii-xviii)	FLPMA	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b)		(5)	(5)		

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(vii), (viii) and (xvii-xviii))

(b) (5)

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(xv)(xvi))

Summary: This plan addresses the following provisions of section 3(b)(xv)-(xvi) of EO 14153:

(xv) reinstate the following Public Land Orders: Public Land Order 7899, signed by the Secretary of the Interior on January 11, 2021; Public Land Order 7900, signed by the Secretary of the Interior on January 16, 2021; Public Land Order 7901, signed by the Secretary of the Interior on January 16, 2021; Public Land Order 7902, signed by the Secretary of the Interior on January 16, 2021; Public Land Order 7903, signed by the Secretary of the Interior on January 16, 2021; and any other such Public Land Order that the Secretary of the Interior determines would further the policy interests described in section 2 of EO 14153; and,

(xvi) immediately review all Department of the Interior guidance regarding the taking of Alaska Native lands into trust and all Public Land Orders withdrawing lands for selection by Alaska Native Corporations to determine if any such agency action should be revoked to ensure the Department of the Interior's actions are consistent with the Alaska Statehood Act of 1958 (Public Law 85-508), the Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. 3101 et seq.), the Alaska Native Claims Settlement Act of 1971 (43 U.S.C. 1601, et seq.), the Alaska Land Transfer Acceleration Act (Public Law 108-452), and the Alaska Native Vietnam-era Veterans Land Allotment Program under section 1629g-1 of title 43, United States Code.

Top priorities:

1. Provide recommendations regarding Secretarial reinstatement or other action to address PLO Nos. 7899, 7900, 7901, 7902, and 7903, consistent with EO 14153 sec. 3(b)(xv);
2. Evaluate options and provide recommendations regarding any other withdrawals in Alaska for compliance with section 2 of EO 14153.

Additional Information: Provide any other additional information that needs to be considered to successfully implement this action plan.

Public Land Orders (PLOs) are a Secretarial-level decision; BLM will provide recommendations and follow Secretarial direction. Coordination with other federal agencies will be required to facilitate any changes to the withdrawals where lands are under their respective jurisdiction. The BLM can only make recommendations for BLM-managed lands and will defer to the agency's administrative processes for recommendations.

(b) (5)

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(xv)(xvi))



Responsive to	SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Section 3(b)(xv))				
Accountable	Assistant Secretary for Land and Minerals Management				
Initiative					
Reinstate PLOs revoking ANCSA 17(d)(1) withdrawals as directed in EO 14153 Section 3(b)(xv)(a)-(e).					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Remove undue barriers to domestic exploration, development, production, and	Authority used to withdraw the land, as cited in the PLOs.	(b) (5)			

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(xv)(xvi))

marketing of natural resources. Clear title, stabilize the supply chain, and inform RMP implementation.	FLPMA EO 14153	(b) (5)	
Milestones		Due Date	Measurable Metrics
(b) (5)			

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(xv)(xvi))

Responsive to	SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Sections 3(b)(xv)-(xvi))				
Accountable	Assistant Secretary for Land and Minerals Management				
Initiative					
Reinstate or revoke Public Land Orders to ensure the Department's actions are consistent with federal laws specific to Alaska.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
<p>Review & Identify withdrawals that could be revoked to support achieving the goals of EO 14153 Section 2.</p> <p>Review & identify any remaining ANCSA withdrawals that could be revoked pursuant to EO 14153 Section 3(b)(xvi).</p>	<p>Authority used to withdraw the land, as cited in the PLOs.</p> <p>FLPMA</p> <p>EO 14153</p>				
Milestones		Due Date	Measurable Metrics		

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(xv)(xvi))

(b) (5)

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: Coastal Plain (EO 14153 Secs. 3(b)(i) – (b)(vi))

Summary: In response to Secretary's Order (SO) 3422, this draft action plan identifies options to implement direction in Executive Order (EO) 14153 concerning the Coastal Plain (1002 area) of Arctic National Wildlife Refuge (ANWR), as laid out in Sections 3(b)(i)-(vi).

Top priorities:

(b) (5)

Additional Information:

Sec. 3(b)(i) directed the Department to withdraw SO 3401 from June 2021, which has already been implemented by SO 3422.

Sec. 3 (b)(ii) requires cancelled leases to be reissued and calls for additional leasing. (b) (5)

[Redacted]

Also relevant to Sec. 3(b)(ii), (b) (5)

[Redacted]

Secs. 3(b)(iii), (v), and (vi) direct rescission of the 2024 Final Supplemental Environmental Impact Statement (SEIS) and ROD, and reinstatement of the 2019 Final EIS and 2020 ROD. (b) (5)

[Redacted]

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: Coastal Plain (EO 14153 Secs. 3(b)(i) – (b)(vi))

(b) (5)

Responsive to	SO 3422 – Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Sections 3(b)(ii)-(iii) and (b)(v)-(vi))				
Accountable	Assistant Secretary for Land and Minerals Management				
Initiative					
Sec. 6(a), implementing EO14153					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Provide for the expeditious leasing and production of domestic energy resources in Alaska's Coastal Plain.	Tax Act of 2017	(b) (5)			
Milestones		Due Date		Measurable Metrics	
(b) (5)					

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: Coastal Plain (EO 14153 Secs. 3(b)(i) – (b)(vi))



Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: Alaska LNG and TAPS (EO 14153 Sections Sec. 3 (b) (ii) and Sec. 3 (xxiii))

Summary: In response to Secretary’s Order (SO) 3422, this draft action plan addresses direction in EO 14153 to prioritize the development of Alaska’s Liquified Natural Gas (LNG) potential (Sec. 2(d) and Sec. 3(b)(ii)) and to identify and assess the long-term viability of the Trans-Alaska Pipeline System (TAPS) and the associated Federal right-of-way (ROW) as an energy corridor of critical national importance (Sec. 3(b)(xxiii)).

Top priorities:

(b) (5)

Additional Information:

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: Alaska LNG and TAPS (EO 14153 Sections Sec. 3 (b) (ii) *and* Sec. 3 (xxiii))

(b) (5)

Responsive to	SO 3422- Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(a)(ii), and (b)(xxiii))				
Accountable	Assistant Secretary for Land and Minerals Management				
Initiative					
Sec. 6, implementing EO 14153					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Implement EO 14153 Secs. 3(b)(ii), and (xxiii)	MLA TAPAA ANILCA	(b) (5)			
Milestones		Due Date	Measurable Metrics		

(b) (5)

(b) (5)

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: Navigability (EO 14153 Secs. 3(b)(xxi))

Summary:

This draft action plan identifies options to implement direction in Secretary's Order (SO) 3422 and Executive Order (EO) 14153 (Section 3(b)(xxi)) to immediately conduct a navigability review of Alaska waters.

Top Priorities:

(b) (5)

Additional Information:

(b) (5)

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: Navigability (EO 14153 Secs. 3(b)(xxi))

(b) (5)

Responsive to	SO 3422- Unleashing Alaska's Extraordinary Resource Potential (EO 14153 Secs. 3(b)(xxi))				
Accountable	Assistant Secretary for Land and Minerals Management				
Initiative					
Sec 6 implement the EO 14153					
Policy Goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Implement EO 14153 Section 3(b)(xxi). Update title record to simplify permitting and clarify rules for land use.	Submerged Lands Act Quiet Title Act ANILCA FLPMA	(b) (5)			
Milestones	Due Date				
(b) (5)					

Title: Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: Navigability (EO 14153 Secs. 3(b)(xxi))

(b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential: National Petroleum Reserve in Alaska (EO 14153 Secs. 3(b)(ix-x, xii-xiv))

Summary: In response to Secretary’s Order (SO) 3422, this draft action plan identifies options to implement direction in Executive Order (EO) 14153 concerning the National Petroleum Reserve in Alaska (NPR-A), as outlined in Sections 3(b)(ix)-(x) and 3(b)(xii)-(xiv).

Top priorities:

(b) (5)

Additional Information:

3(b)(ix) and (xiii) direct rescission of the final rule entitled “Management and Protection of the National Petroleum Reserve in Alaska,” 89 Fed. Reg. 38712 (May 7, 2024). (b) (5)

3(b)(x) directs rescission of the January 16, 2025, guidance on protection of subsistence resource values in existing and proposed special areas and 3(b)(xii) directs rescission of the notice entitled “Special Areas Within the National Petroleum Reserve in Alaska,” 89 Fed. Reg. 58181 (July 17, 2024). (b) (5)

3(b)(xii) and (xiv) are principally oriented toward reverting to the 2020 Integrated Activity Plan (IAP) Record of Decision (ROD). (b) (5)

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's
 Extraordinary Resource Potential: National Petroleum Reserve in Alaska (EO 14153 Secs. 3(b)(ix-x, xii-xiv))

Responsive to	SO 3422 – Unleashing Alaska's Extraordinary Resource Potential				
Accountable	Bureau of Land Management				
Initiative					
Rescind the 2022 NPR-A IAP ROD and reinstate the 2020 IAP ROD through a quick, streamlined, and legally sustainable process.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Efficiently and effectively maximize the development and production of natural resources in Alaska.	NPRPA and FLPMA	(b)	(5)		
Milestones		Due Date	Measurable Metrics		
(b)		(5)			

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's
 Extraordinary Resource Potential: National Petroleum Reserve in Alaska (EO 14153 Secs. 3(b)(ix-x, xii-xiv))

Responsive to	SO 3422 – Unleashing Alaska's Extraordinary Resource Potential				
Accountable	Bureau of Land Management				
Initiative					
Reconsider final rule entitled "Management and Protection of the National Petroleum Reserve in Alaska," 89 Fed. Reg. 38712 (May 7, 2024).					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Efficiently and effectively maximize the development and production of natural resources in Alaska, expedite the permitting and leasing of energy and natural resource projects in Alaska.	NPRPA and FLPMA	(b)	(5)		
Milestones			Due Date	Measurable Metrics	
(b) (5)					

Assistant Secretary for Land and Minerals Management Action Plan for SO 3422 – Unleashing Alaska's
Extraordinary Resource Potential: National Petroleum Reserve in Alaska (EO 14153 Secs. 3(b)(ix-x, xii-xiv))

(b) (5)

**Bureau of Safety and Environmental
Enforcement
(BSEE)**



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

February 13, 2025

Memorandum

To: Cara Lee Macdonald
Chief of Staff, Exercising the Delegated Authorities of
the Assistant Secretary, Land and Minerals Management

From: Paul P. Huang
Acting Director
Bureau of Safety and Environmental Enforcement

Subject: Action Plan to Implement Secretarial Order 3422 - Unleashing Alaska's
Extraordinary Resource Potential

Summary

In accordance with Secretarial Order (S.O.) 3422, "Unleashing Alaska's Extraordinary Resource Potential," issued by Secretary Burgum on February 3, 2025, BSEE prepared the following action plan to ensure the efficient and timely implementation of President Trump's January 20, 2025, Executive Order (E.O.) 14153, titled "Unleashing Alaska's Extraordinary Resource Potential." In accordance with S.O. 3422, BSEE will implement the following priority:

Top Priorities

- **Pursue rescission of previous Department of the Interior decision.** As directed by Section 3(i) of E.O. 14153, BSEE's review of "any and all regulations, orders, guidance documents, policies, and any other similar agency actions that are inconsistent with the policy set forth in Section 2 of the" E.O., produced one agency decision which BSEE asserts may be within the scope of the E.O. and within the Department's authorities to rescind.

Additional Information

While E.O. 14153 and S.O. 3422 focus heavily on actions taken to unlock, prioritize and expedite development of resources located onshore Alaska, at least one "other similar agency action" under BSEE's jurisdiction over Alaska's Outer Continental Shelf (OCS) taken by the previous Acting Deputy Secretary of the Department of the Interior may be relevant to the orders. Combined with the President's January 20, 2025, E.O. titled "Initial Rescissions of Harmful Executive Order and Actions" which rescinds The Presidential Memorandum of March 13, 2023, titled "Withdrawal of Certain Areas off the United States Arctic Coast of the Outer Continental Shelf from Oil or Gas Leasing", there may be more than one path for BSEE to recommend attaining the President's goals specific to BSEE's jurisdiction.

The action in question pertains to the Liberty Unit, an offshore oil development project in the Arctic OCS which has been previously approved for development twice over three decades but has been unable to proceed toward development for various investment and legal challenges. A decision to

deny the lessee's request for a Suspension of Production for the three OCS leases which comprise the Liberty Unit, made by the former Acting Deputy Secretary of the Interior on December 26, 2024, resulted in the expiration of the three OCS leases and termination of the Unitization Agreement for the Liberty Unit. A briefing paper describing the issue in greater detail and including the relevant request and decision letter is attached.

Action Plan



Our bureau remains committed to ensuring the safe, reliable, and diversified supply of energy for our Nation. We stand ready to support the requests for more information on this strategy, including the approval of the above recommendations. Please let me or BSEE's Chief of Staff, Wes James (Weston.James@bsee.gov), know if you have any questions.

Attachment(s):

- Issue Paper - Hilcorp (Feb 6, 2025)
- Liberty Lease Suspension Request Denial
- Hilcorp Response Letter for Liberty SOP
- BOEM Liberty DPP Review

cc: Acting Director, BOEM

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT

ISSUE: HILCORP ALASKA, LLC

I. KEY POINTS

(b) (5)

II. OPPORTUNITIES AND CHALLENGES

(b) (5)

(b) (5)

III. BACKGROUND

(b) (5)

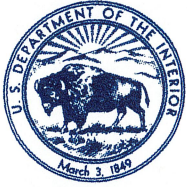
IV. ATTACHMENTS

Attachment 1 - Liberty Lease Suspension Request Denial
Attachment 2 - Hilcorp Response Letter for Liberty SOP
Attachment 3 - BOEM Liberty DPP Review

V. PREPARED BY:

Justin Miller, Alaska OCS Regional Director, Bureau of Safety and Environmental Enforcement

DATE: February 6, 2025



THE DEPUTY SECRETARY OF THE INTERIOR
WASHINGTON

DEC 26 2024

Mr. Aaron O'Quinn
Land Manager, Hilcorp Alaska, LLC
3800 Centerpoint Drive, Suite 1400
Anchorage, AK 99503

Dear Mr. O'Quinn:

The Bureau of Safety and Environmental Enforcement's (BSEE) Alaska Outer Continental Shelf (OCS) Region received Hilcorp Alaska, LLC's (Hilcorp) request for a Suspension of Production (SOP) for the three OCS leases comprising the Liberty Unit on August 28, 2024. The leases are currently held under an SOP that was granted on December 22, 2021, for a period of 3 years, expiring December 26, 2024. The three leases are OCS-Y-1585, OCS-Y-1650, OCS-Y-1886, all located in the Beaufort Sea OCS. BSEE is informing Hilcorp that our review of the SOP request is complete, and BSEE is issuing a decision on the request as detailed in this letter.

Background

Leases and Unitization Agreement

The oldest of the three Liberty Unit leases, OCS-Y-1585, was acquired in Beaufort Sea OCS Lease Sale 124 with an effective date of August 1, 1991. A second lease, OCS-Y-1650, was awarded in Beaufort Sea OCS Lease Sale 144 and effective October 1, 1996. On February 7, 1997, the Liberty #1 well was spudded on Lease OCS-Y-1650 and resulted in a commercially viable well test before being permanently plugged and abandoned on April 6, 1997. Leases OCS-Y-1585 and OCS-Y-1650 were approved for unitization under the Liberty Unit Agreement on June 27, 2003. A third lease, OCS-Y-1886, was awarded in Beaufort Sea OCS Lease Sale 202 with an effective date of July 1, 2007, and was approved to join the Liberty Unit on April 21, 2016.

BSEE's regulations at 30 CFR § 250.1301(g) (Unit operations) state: "If your lease, or any part of your lease, is subject to a unit agreement, the entire lease continues for the term provided in the lease, and as long thereafter as any portion of your lease remains part of the unit area, and as long as operations continue the unit in effect." Further, 30 CFR 250.1301(g)(2) provides: "When a lease in a unit agreement is beyond the primary term and the lease or unit is not producing, the lease will expire unless: (i) You conduct a continuous drilling or well reworking program designed to develop or restore the lease or unit production; or (ii) BSEE orders or approves a suspension of operations under § 250.170."

The three leases comprising the Liberty Unit are each beyond their primary term and remain valid until the expiration of the Liberty Unit. Since the Liberty Unit's approval in 2003, the leases comprising the Liberty Unit have been granted a sequence of nine separate lease

suspensions, not including two suspensions granted for the oldest Liberty lease prior to unitization. Each suspension was requested by Hilcorp or prior lessees and justified to BSEE's satisfaction citing various technical, permitting, and legal delays and other challenges in accordance with regulatory requirements and BSEE's discretion.

Development and Production Plan and Recent Lease Suspensions

On October 17, 2018, the Bureau of Ocean Energy Management (BOEM) approved a Development and Production Plan (DPP) for the Liberty Unit. Following BOEM's DPP approval, Hilcorp requested an SOP from BSEE citing both: (1) Hilcorp's need to have an Oil Spill Response Plan (OSRP) approved by BSEE before being able to proceed with development operations; and (2) Hilcorp's commitment to production before June 2023. BSEE approved the SOP for a term of 18 months, expiring on July 15, 2020. On December 26, 2019, BSEE approved another subsequent SOP request for a term of 2 years or 30 days after approval of an OSRP, whichever would come first.

On December 7, 2020, the United States Court of Appeals for the Ninth Circuit vacated BOEM's Environmental Impact Statement and Record of Decision approving the Liberty Unit DPP and remanded the action to BOEM for further proceedings consistent with the court's opinion. The court also deemed unlawful the U.S. Fish and Wildlife Service's Biological Opinion addressing the Liberty Unit DPP. Following the court's decision, BOEM inquired with Hilcorp via letter dated March 19, 2021, as follows: "BOEM requires that Hilcorp confirm in a letter to BOEM whether it is planning to pursue the activities described in the Liberty DPP for Outer Continental Shelf (OCS) blocks OCS-Y-1650, OCS-Y-1886 and OCS-Y-1585. Please clarify whether Hilcorp is planning to pursue the activities as described in the existing Liberty DPP or if Hilcorp anticipates amending the Liberty DPP."

On September 21, 2021, Hilcorp requested another SOP. In the request, Hilcorp stated that "[a]n extended SOP is necessary to allow BSEE, BOEM, and Hilcorp Alaska to appropriately address pending environmental analysis associated with the project's overall environmental review process and to overcome delays associated with ongoing litigation. (See 30 CFR § 250.172(d) authorizing BSEE to grant an SOP to 'carry out the requirements of NEPA or to conduct an environmental analysis[']; and 30 CFR § 250.172(e) to overcome the 'inordinate delays encountered in obtaining required permits... including ... Judicial challenges or appeals.')."

In its request, Hilcorp assured BSEE that "[d]uring the requested SOP period, Hilcorp Alaska will continue to provide quarterly updates to BSEE on progress made to date, permitting, agency coordination and stakeholder outreach activities. Hilcorp Alaska commits to continuing engineering processes, continuing to engage with [BSEE's Oil Spill Preparedness Division] to obtain an OSRP and committing capital to continue progressing the Liberty Project forward to development."

BSEE approved the SOP "effective December 26, 2021, and will extend until such time as the OSRP is approved, with a 30-day period in which to apply for a subsequent SOP for construction, or three years, whichever is shorter." Absent a complete OSRP submission from

Hilcorp resulting in an approval of the OSRP by BSEE or another subsequent SOP approval, this SOP will expire on December 26, 2024.

In a letter dated May 9, 2022, Hilcorp responded to BOEM's inquiry of March 19, 2021. Hilcorp affirmed it "is continuing to update the Liberty Oil Spill Response Plan (OSRP), specifically focusing on a mechanical response strategy for the worst-case discharge scenario. While the initial OSRP focused on intentional well ignition and well capping for a worst-case discharge response, Hilcorp is now updating the OSRP to include more traditional mechanical response tactics. The addition of a full mechanical response scenario will result in changes to the Liberty DPP. Hilcorp is currently working with the University of Alaska Fairbanks (UAF) to study technical aspects of the proposed mechanical response concept. Upon conclusion of that study, Hilcorp will complete updates to the OSRP and resubmit to BSEE for review and approval. Hilcorp does not propose to amend the Liberty DPP until BSEE determines the OSRP is adequate and complete."

Oil Spill Response Plan

Hilcorp submitted its first OSRP for the Liberty Unit to BSEE's Oil Spill Preparedness Division (OSPD) in March 2017. In July 2017, BSEE OSPD provided feedback to Hilcorp on the OSRP through a process called Request for Additional Information (RFAI), identifying 91 individual line-item deficiencies in the application that required additional comment or action from Hilcorp in order for BSEE to advance the OSRP for further review. In December 2017, Hilcorp submitted a first revision of the OSRP to BSEE for review, and in April 2018, through a second RFAI process, BSEE determined and notified Hilcorp that the revised OSRP did not comply with the requirements in 30 CFR § 254. Specifically, in accordance with 30 CFR § 254.5(b): "The OSRP must be consistent with the National Contingency Plan (NCP) and the appropriate Area Contingency Plans (ACP)." The response tactic proposed by Hilcorp in the OSRP, Intentional Well Ignition, was not an approved oil spill response tactic in either of those documents.

In September 2018, BSEE OSPD received Hilcorp's response to BSEE's second RFAI, including a second revision of the OSRP. In July 2019, BSEE completed a review of the second OSRP revision and identified to Hilcorp 29 remaining RFAI line items to be addressed.

In support of its September 21, 2021, SOP request to BSEE (the "current SOP"), Hilcorp's Reasonable Schedule of Work (RSW) described actions to resolve still-outstanding deficiencies in the OSRP application to BSEE, mainly through pursuit of a contracted study with UAF, which Hilcorp argued may serve to inform BSEE's decision to authorize elements of a future revision to the pending OSRP application. BSEE approved a suspension until such time as the OSRP was approved or for 3 years, whichever was shorter.

BSEE's approval of the current SOP also contained Conditions of Approval (COAs) that required Hilcorp to provide quarterly status updates of its progress toward the RSW and plans for the next quarter's RSW progress, and it informed Hilcorp that failure to complete the RSW milestones by the end of the SOP term could lead to denial of future SOP requests. The COAs

also established that BSEE may request “evidence of diligence” as Hilcorp worked to satisfy the requirements of the SOP RSW.

Over most of the course of the current 3-year SOP term and associated RSW, Hilcorp affirmed to BSEE quarterly that both coordination with BSEE OSPD to complete an OSRP submission and talks with UAF refining a final study contract were continuing. BSEE accepted Hilcorp’s quarterly reports updating BSEE on the Liberty SOP RSW until the submission for the 4th quarter of 2023, dated January 15, 2024. The initial RSW update submission for that quarter asserted that Hilcorp had received a final study scope and cost estimate for a potential contract with UAF and would work with UAF to initiate the study in 2024. On January 25, 2024, BSEE requested that Hilcorp submit the final UAF study scope as “evidence of diligence” prior to BSEE’s acceptance of the pending quarterly RSW progress report submission.

Hilcorp’s February 1, 2024, response to BSEE provided the study scope but clarified that the study scope “does not reflect the final study scope. Hilcorp intends to refine the scope in future discussions with UAF” and added that “[i]n addition to working with UAF, in 2023, Hilcorp evaluated the technical feasibility of drilling the Liberty reservoir from the Endicott Satellite Drilling Island (SDI) and an alternative onshore location. A review of these options will occur in the 1st quarter 2024 and Hilcorp will provide an update in the next Liberty quarterly SOP status report. Hilcorp introduced the possibility of this extended reach alternative in a meeting with the BOEM Alaska Director in January 2024. Further discussion regarding implications to the DPP will take place following Hilcorp’s technical analysis of these alternative surface hole options.”

In response to this new information, BSEE’s Alaska OCS Regional Office requested a joint meeting with Hilcorp and BSEE OSPD to discuss Hilcorp’s Liberty Unit development intentions and the technical details of the draft UAF study scope in greater detail, and to discuss timing of any submissions Hilcorp may need to make to BSEE prior to the December 26, 2024, expiration of the current SOP. At a meeting held virtually on March 4, 2024, Hilcorp confirmed to BSEE that it was evaluating an option to revise its Liberty DPP to develop the Liberty Unit from an onshore location rather than from the previously permitted OCS artificial gravel island. BSEE discussed the nearing expiration date of the current SOP and reviewed with Hilcorp the regulatory citations governing BSEE’s consideration of an SOP request before providing Hilcorp a printed copy of the regulations.

BSEE also explained the distinction between a BSEE OSRP approval and a BOEM DPP approval. A BSEE OSRP approval is not a prerequisite to a BOEM DPP approval. They are separate approvals that follow different processes and as such, continued delays in submitting a sufficient OSRP after so many years, without demonstrating significant progress, would not support approval of additional SOPs. BSEE asserted that, given all the other outstanding permitting actions yet to be resolved before the Liberty Unit could proceed to development and the anticipated lack of successful completion of RSW milestones leading to an OSRP approval during the current SOP term, Hilcorp would need to provide greater justification beyond its work to submit an adequate OSRP to support further suspension requests. When BSEE OSPD attempted to address how Hilcorp’s draft UAF study scope might not sufficiently address BSEE’s requirements for a complete OSRP submission in its current state, Hilcorp stated it did

not have a staff member present who could speak in detail on the technical aspects of the UAF study proposal with BSEE OSPD.

On May 10, 2024, Hilcorp contacted BSEE and BOEM to request a joint meeting “to discuss changes we are considering for the Liberty Development Plan. We would like to get feedback on the proposed changes, BOEM’s process, and any potential implications for the SOP.” At the meeting held on June 5, 2024, Hilcorp informed BSEE and BOEM that it was not going to proceed with developing the Liberty Unit from a new artificial gravel island in OCS waters or from an onshore location as proposed in the pending DPP. Instead, Hilcorp would change its entire plan and submit a new DPP to BOEM to develop the Liberty Unit from the existing Endicott SDI. This change would also require Hilcorp to submit a new or revised OSRP to BSEE.

National Environmental Policy Act

In the meeting on June 5, 2024, Hilcorp also stated it would likely submit another SOP request to BSEE after it submitted a revised DPP to BOEM in the fall, citing as justification that the SOP would be “necessary to carry out the requirements of the National Environmental Policy Act (NEPA) or conduct an environmental analysis” and that BOEM’s NEPA review of Hilcorp’s DPP submission should meet that justification. BSEE informed Hilcorp that the suggested timing of its submission was tight because BSEE would not approve an SOP on that justification unless BOEM could affirm to BSEE that NEPA activities were underway to BOEM’s satisfaction prior to expiration of the current SOP.¹ BOEM confirmed it does not formally commence its NEPA review until it has deemed a DPP submission complete and published a Notice of Intent to commence NEPA analysis in the Federal Register.

The August 12 and August 28, 2024, Suspension of Production Requests

On August 12, 2024, Hilcorp submitted a request for BSEE to grant an SOP pursuant to 30 CFR § 250.172 for a period of 1 year from December 26, 2024. Hilcorp’s request seeks a suspension based on the need to conclude a NEPA review and delays with submitting an adequate OSRP. Following an administrative review of the request to verify that it contained each of the required elements of a suspension request as defined in 30 CFR § 250.171, BSEE returned the request to Hilcorp on August 27, 2024, because it was incomplete. The notification to Hilcorp stated “BSEE has determined that your request does not sufficiently satisfy three of the required elements, as follows:

- § 250.171(c): A statement that a well has been drilled on the lease and determined to be producible according to § 250.1603 (SOP only), 30 CFR § 550.115, or 30 CFR § 550.116;
- § 250.171(d): A commitment to production (SOP only); and
- § 250.171(e): The service fee listed in § 250.125 of this subpart.”

Hilcorp responded on August 28, 2024, with a request that was substantively identical to the August 12 submission but contained each of the required elements of § 250.171 to BSEE’s

¹ Hilcorp’s prior DPP submission had not been deemed complete until 9 months after its original submittal.

satisfaction. Hilcorp submitted this missing information and service fee on August 28, 2024. Following BSEE's verification of a complete request, BSEE commenced a technical and regulatory analysis of the SOP request.

On December 13, 2024, BSEE received a supplement to Hilcorp's request for an SOP for the three OCS leases comprising the Liberty Unit. In that supplement, Hilcorp stated that it had submitted a DPP to BOEM on November 20, 2024, that "contains a schedule which plans to return to production by January of 2029" and that "is subject to review under [NEPA]." By letter dated today, BOEM informed Hilcorp that its DPP is incomplete.

Analysis

To request a suspension, Hilcorp must submit to BSEE the information identified in 30 CFR § 250.171 before the end of the lease term. That information must include the justification for the suspension, a reasonable schedule of work leading to commencement of the suspended activity, a statement that a well has been drilled on the lease and determined producible, a commitment to production, and the required service fee. BSEE must determine that the request has met these requirements before it may grant a suspension. These relevant requirements and considerations of 30 CFR § 250.171 are analyzed as follows:

- a) 30 CFR § 250.171(a) requires a suspension to contain a justification and length for the suspension. Hilcorp's request contains its justification for the suspension including the length of suspension requested (1 year) as required by 30 CFR § 250.171(a).
- b) 30 CFR § 250.171(b) requires an RSW leading to the commencement or restoration of the suspended activity. To grant an SOP, the RSW must result in the commencement of production prior to the expiration of the requested SOP. The ultimate outcome of the RSW schedule (production) should be demonstrably achievable. The RSW Hilcorp submitted in August 2024 does not show a path leading to the commencement of production within the requested SOP duration, ending instead in a "return to permitting." The final milestone of the provided RSW states that in November 2025, "Hilcorp requests additional SOP extension pending NEPA review by BOEM including a schedule of work which will outline required permitting activities and timelines." Similarly, the supplement Hilcorp submitted in December 2024 fails to show a path leading to the commencement of production within the requested SOP duration. Hilcorp requested a 1-year SOP; the DPP referenced in the supplement would not commence production from the Liberty Unit until January of 2029. Moreover, BOEM has determined that the DPP is incomplete. Therefore, Hilcorp's request fails to satisfy 30 CFR 250.171(b).
- c) 30 CFR § 250.171(c) requires a statement that a well has been drilled on the lease and is producible. BSEE confirms the producibility determination of the Liberty #1 well, drilled by a prior lessee on lease OCS-Y-1650 in 1997, in accordance with 30 CFR § 250.171(c).
- d) 30 CFR § 250.171(d) requires that the lessee demonstrate a commitment to production (CTP). The SOP request submitted in August 2024 asserts that "Hilcorp and predecessor operators have diligently worked to bring the Liberty Leases into production" and "Hilcorp is committed to production from the Liberty Unit. To demonstrate Hilcorp's commitment, the following

suspension request is submitted, which outlines a reasonable schedule of work to achieve an approved ERD DPP.” However, BSEE has determined that the RSW provided to demonstrate this CTP does not contain a firm timeline that would reasonably result in production before the end of the lease term (i.e., December 26, 2025). The schedule of activities described by Hilcorp to demonstrate its CTP instead includes only the preliminary steps necessary to begin a plan approval process. The preliminary steps identified would only lead to submission of another SOP request to BSEE near the end of the new SOP term in December 2025. Because the regulation requires that a request include a CTP that would lead to production prior to the end of the suspension, BSEE cannot approve an SOP, like the one at issue here, that clearly states it will not lead to production by the end of the new suspension. The regulations do not permit a lessee to rely on the future submission of additional SOP requests to extend the period during which the CTP must be demonstrated. Hilcorp’s August 2024 request does not satisfy 30 CFR §250.171(d).

The supplement Hilcorp submitted in December 2024 does not cure these deficiencies. The RSW timeline in the supplement provides 3 years for what it describes vaguely as “Permitting, Facility Upgrades, Procurement for 2028-2029 drilling campaign” but provides no specific details regarding these sweeping categories of action. Hilcorp has referenced a feasibility study for its extended reach drilling strategy but did not provide the study. The supplement also identifies “mobiliz[ing]” the Doyon 26 drilling rig as part of its RSW but provides no information on its drilling capabilities or how those capabilities conform to the results of the feasibility study and no information demonstrating Hilcorp’s efforts to secure a contract or otherwise demonstrate a financial commitment to use this rig. These omissions would not justify a 5-year suspension—the minimum time Hilcorp actually appears to require for production—much less the 1-year suspension Hilcorp has actually requested. Moreover, as noted above, BOEM has determined that the DPP Hilcorp sent is incomplete. Therefore, the supplement does not provide a firm timeline that would reasonably result in production before the end of the 1-year suspension Hilcorp requested.

e) 30 CFR § 250.171(e) requires submission of a service fee. BSEE confirms that Hilcorp submitted the applicable service fee as required by 30 CFR § 250.171(e).

In addition to submitting the information required by 30 CFR § 250.171, Hilcorp’s request must satisfy one of the five identified circumstances for granting an SOO or SOP pursuant to 30 CFR § 250.172. Hilcorp asserts that an SOP is necessary for two reasons under this regulation. First, Hilcorp claims that the request is “necessary to carry out the requirements of NEPA or to conduct an environmental analysis.” 30 CFR § 250.172(d). Second, Hilcorp claims that the request is necessary “to allow for inordinate delays encountered in obtaining required permits or consents, including administrative or judicial challenges or appeals.” 30 CFR § 250.172(e).

First, BSEE disagrees that an SOP is necessary to carry out the requirements of NEPA. Hilcorp is incorrect in asserting that the Ninth Circuit’s December 7, 2020, decision vacating BOEM’s approval of the Liberty DPP and remanding the action means that an applicable NEPA process remains unconcluded. The court required a supplemental NEPA analysis if the DPP is pursued. However, the need to conclude the analysis of the DPP is moot in light of Hilcorp’s representation that it is pursuing an entirely new development concept that requires a revised or amended DPP. It is not necessary to supplement a NEPA analysis for a DPP concept that has

been abandoned and is being replaced by a new concept that will require a new NEPA review. Even if that NEPA analysis were not moot, another SOP would not be necessary to complete that work. The Ninth Circuit issued its judgment 4 years ago; that 4 years provided an adequate amount of time to prepare a supplemental NEPA analysis.

Furthermore, BOEM hosted a virtual meeting with BSEE and Hilcorp on March 29, 2022, to clarify BOEM's expectations for Hilcorp's DPP following the Ninth Circuit's 2020 decision. BOEM's record of that meeting shows that BOEM made clear to Hilcorp "that it is BOEM's understanding that the DPP may change as a result of Hilcorp's OSRP study. BOEM does not know the extent of the changes, but those changes will affect the NEPA analyses. BOEM is waiting on Hilcorp before we revise the NEPA analyses and address court's decisions. BOEM will need to know Hilcorp's changes to their plans before we proceed." BOEM's record of the meeting also confirms that Hilcorp acknowledged that "Hilcorp understands that BOEM is waiting on updates to the DPP before supplementing the NEPA evaluation." In the meeting, BOEM also inquired about Hilcorp's failure to respond to BOEM's March 19, 2021, letter requesting that "Hilcorp provide a written response as to their intent to amend the Liberty DPP and continue pursuit of the Liberty project." The meeting notes show that Hilcorp acknowledged receiving BOEM's letter and "stated Hilcorp would provide BOEM with a written response." Hilcorp responded to BOEM's request on May 9, 2022.

In its August 2024 SOP request, Hilcorp also asserted that the SOP is justified to allow time to draft and submit a "revised DPP" to BOEM, which would trigger the requirement to initiate a new NEPA analysis for the revised DPP. However, Hilcorp's proposal states that it does not anticipate submission of a complete, revised DPP to BOEM until approximately the 4th quarter of 2025, precluding BOEM's initiation of a NEPA analysis before the expiration of the current SOP on December 26, 2024. *See* 30 CFR § 550.285(c).

On November 20, 2024, Hilcorp submitted to BOEM an amended DPP for the Liberty project pursuant to 30 CFR § 550.267(d), rather than a revised DPP pursuant to 30 CFR § 550.285, and the BOEM Regional Supervisor determined that the amended DPP is subject to the procedural requirements of 30 CFR § 550.266. Pursuant to those regulations, BOEM reviewed the submitted information and, in a letter dated today, determined that it is incomplete and therefore deemed not submitted. Even if we were to grant the requested SOP, BOEM would not initiate a new NEPA analysis for the amended DPP until after it has deemed the submission complete. In any event, the amended DPP comes almost 4 years after the Ninth Circuit's decision.

The future initiation of a not-yet-required NEPA analysis does not satisfy 30 CFR § 250.172(d). Hilcorp's request rests on speculation and estimations of time needed for Hilcorp to provide additional information sufficient to cure the deficiencies with the amended DPP and for BOEM subsequently to deem the amended DPP submitted. This speculation and indeterminate, unenforceable timeline do not meet the requirements of this regulation. Therefore, the requested SOP is not "necessary to carry out the requirements of NEPA or to conduct an environmental analysis" within the meaning of 30 CFR § 250.172(d).

Second, BSEE determines that Hilcorp's permitting delay allegations are unfounded. Those allegations center around past "discussions with BSEE" and work during the current SOP period

by Hilcorp's subject matter experts on intentional well ignition. As of the date of this letter, Hilcorp has not yet fulfilled the outstanding line items from the second RFAI, dated July 19, 2019, or submitted a revised OSRP to BSEE. BSEE cannot initiate formal review and technical analysis of Hilcorp's pending OSRP application until BSEE determines that Hilcorp has adequately addressed the 22 line items identified in the RFAI. Hilcorp's inability or refusal to submit a complete OSRP application to BSEE and to do so in a timely manner does not constitute an inordinate delay under 30 CFR § 250.172(e), where the delay is entirely Hilcorp's creation and within its control. Any additional allegations of permitting delays are related to Hilcorp's intention to submit a revised DPP in the future and speculation that this process will entail permitting delays of some unidentified sort. These allegations do not satisfy 30 CFR § 250.172(e).

Decision

Following a detailed review of the information submitted, and based on the information and analysis presented herein, Hilcorp's request, pursuant to 30 CFR § 250.171 and 30 CFR § 250.172, for an SOP of the three Liberty Unit leases is hereby denied.

Please contact Justin Miller at (907) 334-5300 or Justin.Miller@bsee.gov if you have any questions.

Sincerely,



Laura Daniel-Davis
Acting Deputy Secretary

cc: Bureau of Ocean Energy Management
Office of Natural Resources Revenue



January 10, 2025

Laura Daniel-Davis
Acting Deputy Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Paul Huang
Acting Director
Bureau of Safety and Environmental Enforcement
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Ms. Daniel-Davies and Mr. Huang:

This responds to the December 26, 2024, letter denying Hilcorp Alaska, LLC's (Hilcorp) request for a Suspension of Production (SOP) for the three Outer Continental Shelf (OCS) leases, OCS-Y-1585, OCS-Y-1650, and OCS-Y-1886. The denial discourages investment in American energy and disregards Hilcorp's sustained and substantial investment in development of these three leases, which comprise the Liberty Unit. Hilcorp intends to pursue all remedies available to it to challenge this decision.

Hilcorp has worked diligently towards development and production over many years, investing substantial resources including in defense of litigation challenging the Department's original approval of the Liberty Unit Development and Production Plan (DPP). That litigation concluded with the Ninth Circuit's vacatur of the DPP approval in late 2020 -- the DPP approval which Hilcorp, and its predecessor, spent years pursuing.

At no time has Hilcorp indicated a lack of commitment to moving this project forward. After the Ninth Circuit vacatur, Hilcorp continued with its efforts to develop plans and analysis that reflect the best possible approach to development of the Liberty Unit in an environmentally responsible manner. Indeed, Hilcorp's prior SOP requests have been routinely granted. Yet Hilcorp heard no concerns from the agency after Hilcorp submitted its August 2024 SOP request until Hilcorp received the denial letter.

Contrary to Hilcorp's plain commitment to and investment in the Liberty Unit, the December 26, 2024, denial letter attempts to paint Hilcorp's efforts as dilatory. The inaccurate depiction of Hilcorp's commitment to development and production mischaracterizes the history of this matter and Hilcorp's efforts to date. Indeed, as the letter acknowledges, Hilcorp has submitted a revised DPP to BOEM and intends to work with BOEM through its iterative review process.

1111 Travis Street
Houston, Texas 77002

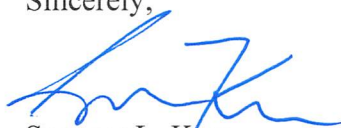
1111 Travis Street
Houston, Texas 77002

Phone: 713/209-2400
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hilcorp.com

Hilcorp is committed to moving forward with the Liberty Unit project and intends to pursue all available remedies to challenge the denial of its SOP request.

Sincerely,



Spencer L. Kerr
Senior Vice President & General Counsel

cc: Bureau of Ocean Energy Management, U.S. Department of the Interior



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
3801 CENTERPOINT DRIVE, SUITE 500,
ANCHORAGE, ALASKA 99503-5823

December 26, 2024

Kirsten Hoppe
Environmental Specialist
Hilcorp Alaska, LLC
3800 Centerpoint Drive, Suite 1400
Anchorage, AK 99503

Ms. Hoppe:

The Bureau of Ocean Energy Management (BOEM) received the Hilcorp Alaska, LLC (HAK) filing of the Liberty Development and Production Plan (Liberty DPP), Amendment 4 on November 20, 2024. This letter constitutes BOEM's determination regarding whether HAK's Liberty DPP, Amendment 4 is deemed submitted pursuant to 30 CFR § 550.266(a).

Pursuant to 30 CFR § 550.266(b), BOEM has determined that the submitted Liberty DPP, Amendment 4 contains problems and/or deficiencies that must be corrected before BOEM can deem the DPP submitted. Enclosure 1 to this letter outlines the deficiencies and missing information. In addition, BOEM also includes comments and requested clarifications on the Liberty DPP (see Enclosure 2), to which HAK's response will not affect whether or not BOEM is able to deem the Liberty DPP submitted.

If you have questions or would like to schedule a meeting, please contact Jack R. Newell, Chief of Plans Section, at jack.newell@boem.gov or (907) 334-5257.

Sincerely,

Joel Immaraj
Regional Supervisor, Leasing and Plans

Enclosures: (1) Information Requests on the Liberty DPP
(2) Comments and Clarifications on the Liberty DPP

ecc: Chuck Wheat, Environmental Manager, Hilcorp
Kate Kaufman, Senior Environmental Specialist, Hilcorp

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Request for Additional Information</i>
1	DPP	6	1.3	Table 1-1 is missing information and/or contains inaccurate statements regarding requirements and consultations under the ESA and the MMPA. For example, the USFWS is listed as a regulatory agency but the National Marine Fisheries Service (NMFS) is not. Similar to the USFWS, NMFS also has responsibilities under both the ESA and the MMPA that are relevant to the proposed project. Additionally, there are multiple ESA-listed species that could be affected by the project but are not mentioned as requiring ESA consultations, including: spectacled eider, bowhead whale, ringed and bearded seals, and potentially others. Finally, several additional marine mammal species are found in the area and while not listed under the ESA, would still fall under the provisions of the MMPA. See 30 CFR 550.243(a) and 550.261(d)
2	DPP	13	2 - Schedule	Include the schedule for all the proposed wells referenced in the DPP (e.g., how long the development and production phases could last if all wells are drilled). Specifically provide the schedule (year, hours per day, days per year) for drilling operations, workovers, or other maintenance activities for the wells. See 30 CFR 550.249, 30 CFR 550.257(b), 30 CFR 550.258(b), 30 CFR 550.241(a)
3	DPP	23	Figure 3-9	Figure 3-9 Production Forecast appears to show the total production from the project over time in graphical form. Provide estimated projections of annual oil (Bbl) and natural gas (mcf) production from the project in table form in order for BOEM to estimate annual GHG emissions and social costs in the NEPA analysis. Values should be provided for the project as a whole (all production wells) being considered under the plan. See 30 CFR 550.243(c)(1)
4	DPP	23-24	3.7 Hydrogen Sulfide	Describe the H2S removal system on SDI and/or MPI: include Manufacturer, model, amine type and H2S waste disposal method, and the concentration of H2S in the waste stream of the amine unit. See 30 CFR 550.245(a) and 550.241(d)

Item Number	Document	Page #	Section	Request for Additional Information
5	DPP	25	4	In the DPP, describe pre-project vehicle traffic travelling to SDI and MPI. Describe the types and amounts of vehicle traffic increases expected from each stage of developing the Liberty Project (including ice road and gravel road trips) and for all phases of the project by season. Also include the vehicle traffic expected during normal production operations (e.g., after drilling and development activities). Include separate information for gravel road and ice road traffic. See 30 CFR 550.257(a), 550.257(c), and 550.261
6	DPP	26, 30	Table 5-1 & Table 5-3	Describe why in Table 5-3 for Corrosion Inhibitor the maximum produced water rate of 230,000 bbl/day is different than the Liberty Design Capacity of 55,000 bbl/day. See 30 CFR 550.243(d)
7	DPP	29	5.7 Process Safety Systems	In the DPP or WCCP Appendix E include the ice conditions, weather or other constraints (e.g., environmental, open water season, etc.) where development and production activities would be curtailed or not proceed. See 30 CFR 550.251(b)
8	DPP	32	6.1	Provide more information on the Doyon 26 and HAK's Innovation Rig, including heights and lighting regime. Large structures in this environment can pose a hazard to birds, including listed species, and additional information is required to mitigate any potential adverse effects (e.g. lighting plan, boom management plan, etc.). See 30 CFR 550.254(b)(1), 30 CFR 550.261(c)(1)
9	DPP	34	Section 6.2 Drilling Unit	Include a brief description of the important safety and pollution prevention features of the Drilling Unit, including a table indicating the type and estimated maximum quantity of fuels and oil stored on the facility. See 30 CFR 550.241(c)

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Request for Additional Information</i>
10	DPP	34	6.2 Drilling Unit	Provide the Doyon 26 rig specification sheet detailing the rig configuration to be used. Include information on the allocation of rig modules powered by main/highline power and those fueled independently by natural gas, diesel, or dual fuel. Rating values should be provided in HP for engines and MMBTU/HR for boilers, burners, or heaters. For engines, please indicate whether they are natural, diesel or dual fueled. Be sure to include emergency equipment along with an estimated duration of use. All this information should be entered into the BOEM-139 sheets, with emissions-producing equipment broken down by individual equipment type. Additional lines can be inserted as needed to account for all items. See 30 CFR 550.249
11	DPP		6.5 Logistics	Provide locations of staging area and support sites for equipment, in addition to the SDI and MPI. Discuss supply/equipment staging or support areas in Deadhorse, and provide location and route to the SDI and MPI and estimated vehicle traffic. See 30 CFR 550.256(a) and 30 CFR 550.256(b), 30 CFR 550.258(a), 30 CFR 550 257
12	DPP	39-41	6.5 Logistics, Table 6-4	In this section (page 41) for the Mud Plant bullet, it states that "Both oil-based mud and water based mud systems and materials will be used." However in Table 6-4, Summary of Drilling Fluids for a Single Well, only water based and synthetic based muds are shown. Please specify if oil-based mud will be used and if so, include the chemical components in Table 6-4. See 30 CFR 550.243(b) and 550.243(d)
13	DPP	41	6.5	Describe how the bulleted list of equipment that will be stored on the island compares to what is there now (i.e., what is the increased level of activity (transportation, personnel, etc.)). See 30 CFR 550.261(c)(1)
14	DPP	43-44	7.2 Support Facilities	The plan states that only minor facility modifications are required at support facilities. Describe the modifications that will be done and the emissions associated with those modifications. See 30 CFR 550.249

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15	DPP	25, 43-44	4.5, 7.2	Provide a detailed map that includes all the Project-area roads/pads/activity areas referred to in these two sections. Note that the two text sections describe the bridges, causeway, breaches, etc. and other road-related facilities differently and a single map with complete labels is needed. Specify the location of all three gravel pads, and the location of the Badami tie-in pad. See 30 CFR 550.257(e)
16	DPP	51- 53	8.1.1.3	Provide copies of the <i>Wildlife Interaction Plan, Master Wildlife Compliance Procedure, Avian Mortality Monitoring and Reporting guidance, and Bear Interaction, Mitigation, and Monitoring Plan</i> as part of the plan and EIA. In addition, provide the specific monitoring and reporting measures to mitigate impacts to wildlife, ESA species, and marine mammals. Several of these plans are also referenced but not provided in the EIA. See 30 CFR 550.252(a), 30 CFR 550.254(a), 30 CFR550.261(c)(3)
17	DPP	52	DPP 8.1.1.4	Identification of mitigation and monitoring is required for incidental take of ESA species. Provide additional information on potential spectacled eider take, including bird strikes. See 30 CFR 550.252(a) and 550.252(b)(1)
18	DPP			Provide the current location of the drilling rig, transportation route to the SDI, type and number of truck trips to mobilize the drilling rig to SDI. See 30 CFR 550.256(a)(1) and 30 CFR 550.261

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19	DPP	54	8.3.1 Projected Emissions	<p>Include BOEM-0139 air emissions worksheets (https://www.boem.gov/boem-0139) for the proposed DPP activities at SDI and MPI, as well as any support activities (e.g. ice road construction, waste hauling etc.) that are associated with this DPP. Identify and list all emission sources and their estimated emissions. These worksheets can be accessed on BOEM's Overview of Air Quality Regulations page found at https://www.boem.gov/environment/environmental-studies/overview-air-quality-regulations.</p> <p>Detailed instructions for using these worksheets are provided in the BOEM-0139 Air Emissions Calculation Instructions found at https://www.boem.gov/boem-0139-instructions. If your equipment is not listed, add its emissions factor to the factors page and cite your source (e.g., EPA, AP, or your engine specification sheet emissions factor). If you are using a unique engine factor, provide supporting information. For further background, refer to the 2011 Gulfwide Emission Inventory Study found at https://epis.boem.gov/final%20reports/5440.pdf. See 30 CFR 550.249, 30 CFR 550.257(b), 30 CFR 550.258(b)</p>
20	DPP	47	7.2.1 Gravel Roads and Pads 7.2.2 Ice Roads	<p>In the BOEM-139 air emissions worksheets outline which vehicles will be used for specific activities, including their counts, engine horsepower, estimated operational hours per day, and days per year: this applies to any process that generates emissions associated with the DPP. For example, in ice road construction, provide a detailed breakdown of the counts, engine horsepower, operational hours, and operational days for equipment such as articulated dump trucks, vacuum trucks, all-terrain vehicles, bulldozers, excavators, trimmers, hot water trucks, motor graders, auger equipment, and other support equipment. Additionally, include estimates for maintenance durations during the winter season. See 30 CFR 550.249, 30 CFR 550.257(b), 30 CFR 550.258(b)</p>

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21	DPP		Air	Break down the Fuel and Mud Storage equipment by individual equipment emissions sources, and location (e.g. SDI location, Rig Module or MPI). See 30 CFR 550.249
22	DPP		Air	Include estimates of any cold vent and potential fugitive emissions listed in the BOEM 139 sheets. See 30 CFR 550.249
23	DPP		Air	Specify if the mud plant at the SDI will use highline power or an independent fuel source. If it uses an independent fuel source, specify the type of fuel, operational hours per day, and days per year. Specify if there is a mud plant at MPI, and if there is, include whether or not it has an independent power source. Additionally, specify if the onboard mud plant of Doyon Rig 26 will be utilized. If so, specify if it operates on main power or an independent power source, and the specific fuel source, if applicable. See 30 CFR 550.249
24	DPP	55-57	8.3.2 ERD Rig Emissions 8.3.3 Endicott Production Facility Emissions	According to the plan, no portable flaring is anticipated; however Doyon Rig 26, SDI, and MDI have a flare, and emergency flaring emissions should be considered and estimated in the BOEM 139 sheets under the COMBUSTION FLARE line items. See 30 CFR 550.249(c)
25	DPP	55-57	8.3.2 ERD Rig Emissions 8.3.3 Endicott Production Facility Emissions	For rig and facility emissions tables, TSP, PM10, and PM2.5 are reported collectively as particulate matter rather than individually, as outlined in the BOEM 139 air emissions worksheets. See 30 CFR 550.249
26	DPP	55-58	8.3.2 ERD Rig Emissions 8.3.3 Endicott Production Facility Emissions	The emissions table are missing other pollutants found on BOEM 139 worksheets (e.g., Pb, NH ₃ , etc.). See 30 CFR 550.249

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27	DPP	56	Table 8-1	Provide a breakdown of the Miscellaneous Support equipment by individual source. See 30 CFR 550.249
28	DPP	69	DPP 11.1 ; 3.16 (EIA)	The DPP and EIA describes archaeological studies completed in the Foggy Island Bay area. Specify if these studies cover the area of the proposed ice road, and if any surveys of the ice road corridor are planned or have already been done. See 30 CFR 550.261(b)(6)
29	EIA	28	3.6.4	Provide references and summarize information on the acoustic environment, especially information on ambient conditions and changes in the acoustic environment during activities similar to those proposed. Provide supporting information and references for the DPP's conclusion that sounds from the proposed activities will occur outside the hearing frequencies or below sensitivity thresholds for marine mammals. See 550.261(c)(5)
30	EIA	61	3.14.4	The EIA states: There is substantial information available, including cataloged locations of dens, which would contribute to the avoidance and mitigation of disturbances to denning polar bears. Summarize and cite this information. See 30 CFR 550.247(a); 550.252(b)(1) and (2)
31	EIA	69-71, 93, 96	3.17.3, 3.17.4, 4.3.2 & 5.3.2	Specify and describe any resources utilized outside of the state. See 30 CFR 550.261(b)(7)
32	EIA	69-71	3.17.3 & 3.17.4	Provide supporting information for the benefits information as a result of the DPP's proposed activities. Provide additional information on where the benefits are, when they occur, who benefits, and how. As an example, include information on government(s) revenue, employment, NSB vs Alaska benefits, NSB (population, wages, jobs), other NS O&G producers, and workforce. Describe any impacts to government revenues, Federal & State Royalties (Permanent Fund), and Taxation (Production Tax, Property Tax, and other relevant taxes). See 30 CFR 550.261(b)(7)

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33	EIA	69-71	3.17.4	In the sections on Effects on Social Systems, describe the demand on social systems, and include a trend analysis, as well as any analogue project discussions. See 30 CFR 550.261(b)(7)
34	EIA	93, 96	4.3.2 & 5.3.2	Provide additional detail specifying impacts within Section 4, Cumulative Impacts and Section 5.3.2. Example information of what can be included: How does additional production affect any shared costs with other producers, tax revenues to local and state governments, with increased resource utilization of existing labor and infrastructure. Would the duration of facilities lifespan at Endicott and employment be impacted from development of Liberty? Include any population impacts to regional/local governments. Describe revenue and job impacts in the NSB and Alaska governments. 30 CFR 550.261(b)(7)
35	WCCP Outline	4	Source Control - Relief Well Location and Timing	Please provide more detailed information on the Innovation Rig, identified as the relief well rig. The WCCP states that the Innovation Rig will be brought on scene in the case of a blowout and it can cross the Endicott causeway bridges and be available regardless of season; however, Section 9.5 of the DPP states that the relief well rig has to be transported by ice road. The WCCP also notes that the Innovation Rig is in the region but more specifics should be provided. See 30 CFR 550.243(h)

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1	DPP	4	Figure 1-1, Figure 1-2	For the map submitted under 30 CFR 550.241(b), show the surface location and bottom hole location of each well and also the bathymetry. Proposed wells SDI-01 through SDI-04 bottom holes should be added to plan view maps. Approximate well paths from SDI should also be included on the map. Please enhance/clarify the map figures to include a clear delineation and labeling of both Endicott islands and existing flowline system, as described in the text, as well as any other "supporting onshore facilities" or "existing North Slope infrastructure" (mentioned in the text on page 2 as supporting the Liberty project) that are not on the current maps. Bathymetry on maps should have color that is distinct from what is used to mark the coastline. Seasonal ice roads should also be included on the vicinity map (Figure 1-2) that was submitted in support of 550.257(e)
2	DPP	5	Table 1-1	Include any potential authorizations associated with ice road construction, if applicable.
3	DPP	6	DPP Table 1-1	Regarding Section 7(a) ESA, note that consultation may need to be reinitiated for spectacled eider. See previous Liberty FWS ITS of 8 eiders due to collision, July 15, 2018.
4	DPP	11	Table 1-2	A Coastal Zone Consistency determination is not required because Alaska does not currently have a Coastal Zone Management Program.
5	DPP	13	Table 2-1	"Open Water" season generally occurs weeks earlier than Aug 1 in this area (e.g. EIA section 3.4 Appendix A - Amendment 2, Bonsell and Dunton 2018)
6	DPP	13	2. Schedule	The referenced Form is identified as BOEM-0137, not BOEM-0317
7	DPP		3 SUBSURFACE	Clarify if wells will be horizontally drilled through the Kingak Shale to reach the Kekiktuk Formation where the Liberty prospect is located.
8	DPP	16-17	Figure 3-2, Figure 3-3, Figure 3-4	Figures relaying information about geological description of Liberty prospect should have either captions or legends detailing the information. Show the depths of expected productive formations and locations of proposed wells on the structure contour maps. Add a key to Structure map on Figure 3-3. See 30 CFR 550.244(b)
9	DPP	19	DPP Fig 3-5	Please provide legend for Map figure, and ensure accurate labeling.

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10	DPP	21-22	3.3 Reservoir Development Plan	Describe the reservoir management plan in more detail with respect to well spacing, the enhanced oil recovery techniques that were considered, and conservation of resources. See 30 CFR 550.246 and 550.203
11	DPP	21	3.2.2 Reservoir Fluid Properties	Reference oil analysis that assessed or tested for the presence of heavy metals, which could significantly impact air quality during emergency flaring. See 30 CFR 550.249(c), 30 CFR 550.243(c)(2)
12	DPP	23-24	3.7 Hydrogen Sulfide	If available, include a reference to a more recent H2S concentration analysis from a comparable well. See 30 CFR 550.245
13	DPP	23	DPP 3.6	Clarify if there will be any seafloor disturbance associated with the DPP, including along rig transport corridor, and confirm adequacy of previous surveys for the ice road routes. See 30 CFR 550.194
14	DPP	26	Section 5.1 Design Basis	Provide more information on Hilcorp's proposal to inject produced gas from Liberty (OCS) into the Endicott Reservoir (State-managed).
15	DPP	27	5.5 Fuel Gas	Clarify whether Hilcorp's intent was to cite BSEE (not BOEM) for the appropriate federal agency to discuss allocation of fuel gas.
16	DPP	28	5.6	In Section 5.6, Clarify whether Hilcorp's intent was to cite BSEE (not BOEM) as the appropriate federal agency to discuss potential commingling
17	DPP	29	Section 5.6.3 Sampling and Calibration of MPFM	Provide more specificity on how often the well samples would be collected.
18	DPP	30	Table 5-3	Include estimated volume of Methanol use.
19	DPP	31	6 Drilling and Well Completions	Include a figure showing how proposed Liberty ERD wells compare to the other referenced ERD wells (e.g., on the North Slope and other parts of the world). See 30 CFR 550.243(e)

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20	DPP	32	DPP 6.1.2.2	Other service units are mentioned in the last sentence of this paragraph. It is unclear if adverse impacts could be associated with "other units". Please clarify
21	DPP	34	Sect 3.2.3 Estimate of Recoverable Reserves -	Based upon the reservoir model used to generate the reserves estimate, include estimated areal extent of the reservoir.
22	DPP	38, 43	DPP 6.3.3, 7.1.1	The DPP states that the fresh water used for drilling will come from permitted sites: please include the volume and frequency of these withdrawals, and specify if surface water sources or wells. For surface water, include an estimated size of the source water body. See 30 CFR 550.261, 550.257(c)
23	DPP	40	Table 6-4	Spell out NAF in table (e.g., Non-aqueous fluid)
24	DPP	42	6.6	Provide the specific state and federal requirements referred to for the lined and bermed mud plant. See 30 CFR 550.243(a)
25	DPP	43	Section 7.1.2 Electrical Power	Discussion on power supply for the Rig 26 at SDI should be summarized here. Clarify if highline power generated at the MPI will be enough to support Rig 26 in addition to operations at the MPI itself. Describe what other electrical components are required to bring and maintain power to SDI.
26	DPP	47	7.2.2; Figure 7-3	Ice roads as shown in Figure 7-3 do not appear to be sufficient for transporting Rig 26. The DPP states that Rig 26 will be transported on ice roads and underneath causeway bridges providing access to the south side of the island. Rig 26 consists of multi-story modules that could potentially exceed the clearance under bridges. Please show feasible routes on a figure or confirm that there are no issues with transporting rig modules/components beneath causeway overpass.
27	DPP	47	7.2.2	Describe if ice roads have been constructed or used in the past near Endicott (MPI or SDI) or near the Causeway.

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28	DPP	53	8.1.2 Marine Mammal Monitoring	According to Table 1-2, this section aims to respond to 30 CFR 550.252(a) Monitoring Systems; however, environmental monitoring systems (e.g., weather variables, sound, air pollution, light pollution, etc.) required by 550.252(a) are distinct from the marine mammal monitoring systems required by 550.252(b).
29	DPP	54	DPP, 8.2 Discharges	Please provide clarification on if existing permits cover projected Liberty discharges. See 30 CFR 550.243(a)
30	DPP	55	8.3.2	Describe the potential for emergency flaring during development and operations. Include any information on the flare height, maximum brightness and duration of flare(s), and estimated flaring rate/frequency if emergency flaring were to occur.
31	DPP	55	8.3.1 Projected Emissions	The SDI distance to shore is provided. Also provide the distance from MPI to shore, and between MPI and SDI. See 550.249(d)
32	DPP		Air	Clarify if there are any three-phase production processing steps at SDI, or if all the processing is done at MPI.
33	DPP	57-61	8.4 Waste Management	The DPP references the Liberty Waste Management Plan, integration into existing Endicott procedures, the <i>Alaska Waste Disposal and Reuse Guide</i> (Revision 11, October 2021, or North slope facility(ies) for managing waste streams. Please provide more specific information on the facilities that will be receiving waste streams, and their locations. See 550.258(d)
34	DPP	72-73, EIA 97	Section 6, Consultation	If not already planned, HAK is advised to consult with both the Native Village of Nuiqsut and the Nuiqsut Whaling Captains Association at its earliest convenience regarding the amended DPP, and update the list on page 97 in Appendix A, Section 6. See 30 CFR 550.261(d)
35	DPP	65	Section 9 Oil and Hazardous Substance Spills	When more information is available on Hilcorp's oil spill response plan and associated BSEE requirements, please include in the DPP. See 30 CFR 550.250(a)

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36	DPP	13, 67	Table 2-1, Section 9.5 Description of Worst Case Discharge Scenario	Specify if there would be any period of time during hydrocarbon zone drilling when a secondary rig cannot be transported via ice road to drill a relief well on SDI, in the context of seasons. According to Table 2-1, drilling in the hydrocarbon zone begins Nov. 01, 2028. However, the relief well rig constraints in Section 9.5 list the primary constraint being mobilization of another rig to transport over ice roads, which cannot be constructed until at least December or January. Confirm that there is secondary rig on-site or one that is capable of drilling relief wells <i>and</i> can be transported over the causeway for the proposed November start. Please describe here at a high level, and address in more detail as Hilcorp initiates other relevant permit applications. See 30 CFR 550.243(h)
37	DPP	74	11.9	Lighting of Lease Structures to Minimize Effects to Spectacled and Steller's Eiders: Although the Liberty project is classified as a development project and not an exploration project, BOEM encourages HAK to implement lighting protocols to lessen impacts to both eider species.
38	DPP	13 76	DPP Table 2-1 and Section 12 Decommissioning	Please include estimated decommissioning schedule. (In particular, because of potential bird attraction/collision hazard from the lighted rig, how long will it be present and operating in the coastal project area, including on the SDI and any nearby staging? How many spring and fall migration seasons will it be present?)
39	EIA	6	2.2- Proposed Action	Paragraph 2 closes with "No flow testing or well test flaring are planned for this drilling program." and is directly contradicted in Paragraph 3, which opens with "HAK first plans to drill the first well and conduct flow tests....".
40	EIA	6	2.2- Proposed Action	"up to four producing wells and one water injection well" is inconsistent with what is described in the Liberty DPP Amendment 4
41	EIA	6	2.3- Alternatives Not Carried Forward	Clarify why these alternatives were not carried forward.
42	EIA	21	3.4.3- Water Levels	The final paragraph describes the differences in water levels from the 1980s to now, but closes with a statement about the 2000's, which is in the middle of the time frames previously mentioned. More explanation and citations are warranted.

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43	EIA	23	Figure 3.4-1	Is landfast ice data from 2017 the most current data available? Suggest updating with more recent data.
44	EIA	24	3.4.6.2- Effects of the No Action Alternative on Air Quality	The header title incorrectly says "Air Quality" instead of "Oceanography"
45	EIA	27- 29	3.6.4	Clarify by providing graphics depicting noise radii for drilling, etc. See 30 CFR 550.261(c)(1)
46	EIA	29	3.7.1	Citation following first sentence of 3.7.1 should be replaced with more up to date information.
47	EIA	30	3.7.1	This information is out-of-date (from 2010). Impaired water lists are updated yearly by ADEC. Please provide up to date citation following first sentence of this page
48	EIA	34	Figure 3.8-1	For the shaded polygons, please indicate that the percentages refer to percent rock cover.
49	EIA	36	3.8.3.1 Final sentence of subsection	This information is out-of-date (from 2012) and should be updated.
50	EIA	40	3.10	Steller's eider breeding habitats are located west of the Liberty project, not east as stated in EIA.
51	EIA	54	3.13.2	The data provided for Muskoxen population numbers in the project area is from 2011 and 2013. Please provide more up to date information if available.
52	EIA	71	Section 3.17.4.1, fifth paragraph	Please explain whether or not the North Slope Borough would be collecting new/additional property taxes or other related revenues if this project was developed. Also, describe the effects to the NSB economy either from additional revenue or no additional revenue associated with this proposal. See 30 CFR 550.261(b)(7), 30 CFR 550.247(c)
53	EIA	83-89	Section 3.20.4.1 and Section 3.22.3.1	Within these pages, impacts to the bowhead whale subsistence hunt staged at Cross Island by the Nuiqsut whalers should be addressed. See 30 CFR 550.247(c)

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54	EIA	89	Section 3.22.3.1	Subsection title 3.22.3.1 could be clarified as: Effects of the Liberty Project from Spills.
55	EIA	92	4.3	The EIA addresses cumulative impacts for Air Quality, Social Systems/Economics, and Oil or Hazardous Material Spill. Although cumulative impacts for all other resources may not have <i>appreciable impacts</i> , they still could be addressed for any kind of future NEPA analysis.
56	EIA	94	5	Clarify if Hilcorp intends to comply with relevant wildlife mitigations from OCS EIS/EA BOEM-2016-010 to include speed limits, while operating onshore.
57	EIA	93, 96	4.3.2 & 5.3.2	Clarify if impacts to existing infrastructure lifespans outside of Endicott are anticipated
58	Seismic Lines	B-2, B-4		Map is difficult to read, as there are overlapping labels, no scale, and no north arrows
59	Seismic Lines	B-4		Bottomhole location for SDI-03 is the same as coordinates listed on Appendix F page 7, SDI-02
60	BOEM-0137 (proprietary)	2, 6, 10, 14		Clarify schedule for each well because as written they appear to all be drilled at the same time.
61	BOEM-0137 (proprietary)	3, 7, 11, 15		Include the Lambert X-Y coordinates and blockline departures for well locations.
62	BOEM-0137 (proprietary)	15		Verify the Coordinates for the SDI-04 bottomhole location.
63	BOEM-0137 (proprietary)	7		Coordinates for SDI-02's bottomhole location are at the same location of SDI-03 on the map on page B-4, Appendix B
64	BOEM-0137 (proprietary)	4, 8, 12, 16		Confirm the value of the "Estimated Net Sand Height MD (Net Pay if hydrocarbon)" to ensure consistency with values in WCD Modeling Report (Appendix D) Table 6-1 for the length of the producing horizontal lateral in the reservoir.

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65	WCD Modeling Report (proprietary)	14	Figure 10-2	Label where the oil column is penetrated on the Profile/Directional Plan diagram within Figure 10-2. In addition, ensure consistency between the reported table values and the diagram: specifically in Section 1 and Section 2 for build rate.
66	WCD Modeling Report (proprietary)			Reference any map of net pay and permeability thickness that was generated to help develop the WCD models. The previous DPP had a net pay isopach and permeability-height (Kh) maps generated to depict hydrocarbon accumulations within the Liberty reservoir.
67	WCCP Outline	2	Pressure Control Equipment	Clarify whether Hilcorp's intent was to cite BSEE (not BOEM) in first paragraph on pressure control equipment.
68	WCCP Outline	3	Source Control – Well Capping	Provide an estimate of how long it would take for well-capping to occur. Also provide more detail on the well ignition techniques described in the Contingency Plan for Loss of Well Control