



# GOVERNMENTAL AFFAIRS REPORT

## **FEDERAL - Legislative**

S. 2986 - Warding off Hostile Administrative Leasing Efforts Act. On September 28, Sen. Bill Cassidy (R-LA) introduced S. 2986, known as the Warding off Hostile Administrative Leasing Efforts Act or the WHALE Act. The bill would prevent the Biden administration from "issuing maritime rules related to the Rice's whale that would impede offshore energy development and military activities." Specifically, the measure "prevents the Secretaries of Commerce and Interior from issuing rules or offshore oil and gas lease requirements or recommendations that establish vessel speed or vessel operational restrictions; requires the Departments to complete a study demonstrating that any mitigation protocols developed to protect Rice's Whales (RWs) in the Gulf of Mexico will not have a negative impact on supply chains, United States offshore energy production and generation, military activities, including readiness, and United States commercial and recreational fishing or maritime commerce; requires the Secretary of Commerce to develop mitigation protocols that make use of real-time location monitoring and location information; and prohibits mitigation protocols and forbids evening transit or vessel speed or vessel operational restrictions." Read more.

S. Res. 386 – National Energy Appreciation Day.
On September 29, Sen. Cynthia Lummis (R-WY) introduced Senate Resolution 386 (S. Res. 386), which designates Oct. 4, 2023 as National Energy Appreciation Day. The purpose of the resolution is "to celebrate the people who work to power the United States and the economy of the United States and to build awareness of the important role that the energy producers of the United States play in reducing poverty, strengthening national security, and improving the quality of life for people around the world." Sen.

Lummis said, "As this administration continues to put our domestic energy producers on the backburner with its war on American energy, it is essential that we pause to recognize and celebrate their invaluable contributions to our daily lives that we so often take for granted." House version, <u>H. Res. 758</u>, was introduced by Rep. Jeff Duncan (R-SC). Read more.

# FEDERAL – Regulatory

Interior Department 5-Year Offshore Oil and Gas Leasing Program. On September 29, the Interior Department announced "its next 5-year leasing program for offshore oil and gas with a maximum of three Gulf of Mexico lease sales and no sale for offshore Alaska." The "Proposed Final Program and Final Programmatic Environmental Impact Statement (EIS) for the 2024-2029 National Outer Continental Shelf Oil and Gas Leasing Program (National OCS Program)" includes "a maximum of three potential oil and gas lease sales - the fewest oil and gas lease sales in history - in the Gulf of Mexico Program Area scheduled in 2025, 2027 and 2029. In compliance with the terms of the IRA, these three proposed lease sales are the minimum number that will enable the Interior Department to continue to expand its offshore wind leasing program through 2030." Read the announcement here. As reported by the Oil & Gas Journal, the 2024-2029 program "will be a sharp drop from the last 5-year program, which included 11 lease sales." Read more. Of the program, Jeffrey Eshelman, President and CEO of the Independent Petroleum Association of America, said, "A plan with only three leases in five years will not only hamper American production but jeopardizes our energy security and will result in hundreds of millions of dollars of lost revenue to coastal states and the federal treasury. The sad truth is that this plan will force the US to get oil from other nations rather than develop American resources by American companies." For more information on the

Program and corresponding EIS, visit the Bureau of Ocean Energy Management National OCS Oil and Gas Leasing Program <u>website here</u>.

**BLM Helium Contracts Rulemaking.** On October 3, the Bureau of Land Management (BLM) published a final rule on Helium Contracts (88 Fed. Reg. 67964). According to the BLM, the Helium Stewardship Act of 2013 required the agency "to sell the Federal Helium System (FHS) and end the Federal Helium In-Kind Program. Accordingly, on September 24, 2021, the BLM declared the FHS as excess to the General Services Administration (GSA), and on September 30, 2022, ceased operation of the Federal Helium In-Kind Program. This final rule removes the Federal Helium In-Kind Program's associated provisions from the BLM's regulations." For background, the "BLM operates and maintains the FHS, which includes a helium storage reservoir, enrichment plant, pipeline system, and related infrastructure near Amarillo, Texas. The BLM will continue to operate the system until the sale is completed. Crude helium is extracted from the storage reservoir and transported to private helium refineries in Oklahoma and Kansas through the Federal Helium Pipeline." Read more.

# BLM Oil and Gas Lease Sale - Mississippi.

On Oct. 6, the BLM Eastern States Office "opened a 30-day public scoping period to receive public input on three oil and gas parcels totaling 90.86 acres that may be included in a March 2024 lease sale in Mississippi." The public comment period is open through Nov. 6, 2023. Read more.

BLM Geothermal Lease Sale – Nevada. On Sept. 29, the BLM announced it is offering "45 parcels containing 135,066.930 acres in the State of Nevada for internet based competitive geothermal leasing." The lease sale will take place on Nov. 14, 2023. As reported by Bloomberg Government, "Geothermal development is central to the Interior Department's renewable energy and climate change agenda because it is abundant on federal land in many Western states. It can be a primary source of electricity for cities that comes without the challenges of other renewables that produce electricity most reliably when it's sunny and windy." For more

information about the lease sale and bidding access, Read more.

BLM Oil and Gas Lease Sale – Nevada. On Oct. 6, the BLM "announced an oil and gas lease sale scheduled for Dec. 5, 2023, to offer four oil and gas parcels totaling 3,498.342 acres in Nevada." For background, "The BLM completed scoping on these parcels in June 2023 and held a public comment period in September 2023 on the parcels, potential deferrals, and the related environmental analysis." A 30-day public protest period is currently open through Nov. 6, 2023. Read more.

# **BLM Alaska Resource Advisory Council Meeting.**

On Oct. 13, the BLM announced that the Alaska Resource Advisory Council (RAC) will "hold a hybrid public meeting, offering in-person and virtual attendance options" on Nov. 29, 2023. Agenda topics for the RAC meeting include "a briefing on land use planning projects, Areas of Critical Environmental Concern, regulatory updates, [and] land transfers." Read more.

BLM Northern California Resource Advisory
Council Meeting. On Oct. 3, the BLM announced that
the Northern California District Resource Advisory
Council (RAC) will meet on Oct. 25 and Oct. 26, 2023.
The RAC meeting dates will include a field tour and
business meeting. A virtual participation option will also
be available and RAC meetings are open to the public.
For background, the "15-member RAC advises
the Secretary of the Interior, through the BLM,
concerning the issues relating to land use planning
or the management of the public land resources
located in northern California and northwest Nevada."
Read more.

### **BLM Wyoming Resource Advisory Council**

**Meeting.** On October 4, the BLM announced that the Wyoming Resource Advisory Council (RAC) will meet on Oct. 18 and Oct. 19, 2023. The RAC meeting dates include a field tour and business meeting. A virtual participation option will also be available and RAC meetings are open to the public. For background, the Wyoming RAC "provides recommendations to the Secretary of the Interior concerning issues relating to

land use planning or the management of the public land resources located within the State of Wyoming." Read more.

BLM Sagebrush/Sage-Grouse Investment. On Oct. 11, the BLM announced \$4.5 million in funding from the Inflation Reduction Act "to improve sagebrush habitat on both public and private lands as part of President Biden's *Investing in America* agenda. The funds will expand on proven success by continuing and expanding a partnership with the Intermountain West Joint Venture for sagebrush conservation and restoration work for an additional five years. The effort will benefit greater sage-grouse, other wildlife species, and the health of BLM-managed public lands." According to the BLM, "The partnership between the BLM and the Intermountain West Joint Venture will address threats and opportunities in sagebrush ecosystems, focusing on six strategies." Read more.

### Interior Department Deputy Secretary Resigns.

On Oct. 4, Interior Deputy Secretary Tommy Beaudreau, the No. 2 official at the department, announced his resignation. The Interior Department said Beaudreau will leave his position in late October. As reported by *The Hill*, "Beaudreau is a longtime Interior official whose tenure with the department began during the Obama administration. He was confirmed to the No. 2 position in June of 2021. While Haaland has established a reputation as an ally to progressives and environmentalists in her tenure at Interior, Beaudreau is viewed as a more moderate figure and has been criticized by the left wing of the Democratic Party as overly close to the fossil fuel industry." Beaudreau's successor has not yet been named. Read more.

Opposition to National Marine Fisheries Service Proposed Gulf of Mexico Vessel Rulemaking. As a follow up to our prior reporting on recent proposed rulemaking (Endangered and Threatened Species; Designation of Critical Habitat for the Rice's Whale; 88 Fed. Reg. 47453) by the National Marine Fisheries Service (NMFS), National Oceanic and Atmospheric Administration (NOAA), and Commerce Department regarding designating critical habitat for the Rice's whale in the Gulf of Mexico, on Oct. 6, the American

Petroleum Institute (API) released a new study "that outlines the potential consequences of new vessel restrictions on American oil and gas workers in the US Gulf of Mexico." According to the API, the study "finds that recently proposed restrictions on oil and natural gas vessels operating in the Gulf of Mexico would have a major negative impact on jobs, industry investment, government revenue and oil and natural gas production in the region, to a nearly one-quarter decline – which is more than 500,000 barrels of oil equivalent per day – in energy production in the Gulf of Mexico by 2040 even as demand continues to rise." Read more. On Oct. 9, the Texas Railroad Commission also weighed in, submitting comments opposing the proposal and noting, "Restricting energy activity in the Gulf of Mexico will impact the supply of crude oil, petroleum products, and liquified natural gas when there's no scientific evidence to support a vast habitat that spans from Texas to Florida, as the Service is proposing. Without a solid foundation of scientific, fully peer-reviewed data, and observations, the current proposal raises serious concerns that the Service does not have adequate scientific evidence to base its proposed designation." Read more.

### FEDERAL - Judicial

Lease Interpretation; Royalties - Texas. In a recent federal case, H.L. Hawkins, Jr., Inc. v. Capitan Energy, Inc. (Case No. P:22-CV-00020-DC), the U.S. District Court for the Western District of Texas addressed a dispute which the court described as "a straightforward issue of lease interpretation." Here, the plaintiffs alleged the lessees "deducted impermissible costs from the gross proceeds used to calculate the royalties owed to Hawkins." The defendants argued "that they have consistently calculated Hawkins' royalty payments in line with the lease agreement's language." Thus, the court decided "the key guestions are what does the lease say, and the language allow?" The court concluded that "if Hawkins wanted the Lease to include an express prohibition against deducting postproduction costs from the price in any contract or oil and gas sale like the parties did [in other cases] it could have done so" but chose not to, thus ruling in favor of the lessees on the lease

interpretation issue. However, the court did rule in favor of the plaintiff regarding the defendants' violation of the Texas Natural Resources Code regarding the requirement that "[t]he proceeds derived from the sale of oil or gas production from an oil or gas well located in this state must be paid to each [lessor] by [lessee] on or before 120 days after the end of the month of first sale of production from the well." Under the Code, "If payments from lessee to lessor are not made within the applicable period, lessee must pay interest on such late payments." The court found there was evidence showing Capitan "failed to pay some amount of royalties owed to Hawkins within the applicable period." Read more.

### **STATE – Legislative**

Corporate Climate Emissions Disclosure -California. On Oct. 7, Gov. Gavin Newsom (D) signed SB 253 into law. The Climate Corporate Data Accountability Act requires large companies "that operate in California and make more than \$1 billion in annual revenues to report both their direct and indirect emissions. That includes things like emissions from operating a building or store as well as those from activities like employee business travel and transporting their products." Read a full bill summary here. As reported by AP, the "California Chamber of Commerce, agricultural groups and oil giants that oppose the law say it will create new mandates for companies that don't have the experience or expertise to accurately report their indirect emissions. They also say it is too soon to implement the requirements at a time when the federal government is weighing emissions disclosure rules for public companies." The Act takes effect Jan. 1, 2024. Read more.

Climate-Related Financial Risk – California. On Oct. 7, Gov. Gavin Newsom (D) signed SB 261 into law. The bill requires "companies that generate more than \$500 million in annual revenue to publish climate-related financial risk reports biennially, beginning in 2026. Failure to comply with SB-261 will result in administrative penalties of up to \$50,000 in a reporting year." Read a full bill summary here. The Act takes effect Jan. 1, 2024. Read more.

### Orphan Well Bonding Requirements - California.

On Oct. 7, Gov. Gavin Newsom (D) signed AB 1167 into law. The Orphan Well Prevention Act "requires companies purchasing marginally productive oil wells to file with the state a bond or financial assurance sufficient to cover well plugging and site restoration costs." Read a full bill summary here. The Act takes effect Jan. 1, 2024. In September, the California Independent Petroleum Association delivered a letter (read the letter here) to Gov. Newsom opposing AB 1167 and asking for a veto, but was unsuccessful. Read more.

Oil and Gas Regulatory Changes – California. On Oct. 7, Gov. Gavin Newsom (D) signed AB 631 into law. The bill enhances various existing civil and other penalties and imposes new ones, including imprisonment, for violations of the state's oil and gas statutes and regulations; strengthens the Geologic Energy Management Division's enforcement authorities, including the authority to seek injunctive relief, cease and desist certain unlawful activities, deploy state actors to conduct remedial work should an operator fail to comply with an order, refer enforcement actions to local prosecutors, and recoup administrative and enforcement costs. Read a full bill summary here. The Act takes effect Jan. 1, 2024. Read more.

### Offshore Oil and Gas Development - California.

On Sept. 30, Gov. Gavin Newsom (D) signed SB 704 into law. "This bill authorizes the California Coastal Commission to seek scientific advice on offshore wind, and revise the coastal-dependent industrial use policies in the Coastal Act of 1976 to bar new or expanded oil and gas development and new or expanded refineries or petrochemical facilities from being considered a coastal-dependent industrial use and authorizes their permitting if all applicable Coastal Act provisions are complied with, among other things." Final Assembly amendments "clarify that repair and maintenance of existing oil and gas facilities, refineries and petrochemical facilities remain subject to existing coastal-dependent industrial use requirements; require that low carbon fuel upgrades to refineries remain subject to existing coastal-dependent industrial use

requirements; and make various minor technical and clarifying changes." The Act takes effect Jan. 1, 2024. Read more.

City Income Tax Act Expansion – Michigan. On Sept. 27. SB 507 passed the Senate and has been transmitted to the House. Sponsored by Sen. Sarah Anthony (D), the bill amends the City Income Tax Act. Specifically, the bill allows any city that levies a city income tax to enter into agreements with the Department of Treasury to administer, enforce, and collect city income taxes; and modifies city income tax collection procedures. This would include provisions dealing with the ability to impose a lien for unpaid taxes; demand for payments, warrants, levies on property; refusal to surrender property; personal liability; levy on salary and wages; service of a warrant-notice levy; and recording a release of a lien or levy. The bill also allows employers that do not do business in or maintain an establishment in a city that levies a city income tax and has entered into agreement with the Department of Treasury, to voluntarily withhold taxes for employees who reside in that city; amends the assessment dispute time frame. The bill expands penalty for frivolous assessment protests; removes existing provision limiting a city's authority to impose a lien or to cause a demand for payment to property owned by a person, and wages or other income that is reported on a Federal W-2 or 1099 form. The bill also would remove the ability of a city that enters into agreement with the Department of Treasury to establish an income tax board of review, an income tax board of review process, and the appeal of income tax board review decisions. Access a full bill summary here.

### **STATE – Regulatory**

Arapahoe County Commissioners Adopt Oil and Gas Regulations – Colorado. On Oct. 10, the Arapahoe County Board of Commissioners "voted to approve several amendments to that county's Land Development Code. Read more here. In a unanimous 5-0 vote, county leaders approved requiring all oil and gas operations to: (1) Be located at least one mile (5,280 feet) from existing or planned reservoirs. The

one-mile setback can be reduced to 2,000 feet if the operation is downgradient (lower elevation) than the body of water; (2) Build access roads compliant with current fire code; (3) Build alternative emergency access roads for well pads located in areas with limited in-and-out access; (4) Provide handwashing supplies for workers at oil and gas sites; and (5) Provide additional application information (including project narrative, photo simulations and documentation of floodplain, wetlands and riparian area boundaries)." As reported in local news outlets, a "county spokesperson said the new regulations decided Tuesday night will only apply to new applications, not existing wells in Arapahoe County." Read more.

Regional Greenhouse Gas Initiative (RGGI) Working Group - Pennsylvania. On Sept. 29, Gov. Josh Shapiro (R) released a Regional Greenhouse Gas Initiative (RGGI) Working Group Memorandum to follow up the working group established in April 2023 which charged its members with evaluating the merits of Pennsylvania membership in the RGGI or a proposed alternative. The working group—whose members included environmentalists, energy companies like Shell, and labor unions—split on whether Pennsylvania should cut emissions by participating in the existing multi-state RGGI or via a new approach. At present, there was consensus among the group that "1) reducing greenhouse gas emissions in the Commonwealth is both necessary and inevitable; and that 2) a cap-and-invest carbon regulation for the power sector that generates revenue to support the Commonwealth's energy transition would be the optimal approach for the Commonwealth to meet the Governor's charge to benefit the environment by reducing emissions. However, there was not consensus on the preferred specific form of cap-and-invest." Read more.

RRC Water/Environmental Protection Waste
Management Rulemaking – Texas. On Oct. 2, the
Texas Railroad Commission (RRC) announced,
"For the first time in nearly 40 years, the Railroad
Commission's Statewide Rule 8 will undergo a
substantial overhaul to better reflect modern waste

management practices and recent advancements in production methods. One of the highest priorities of the Railroad Commission of Texas (Commission) is the protection of groundwater resources. Water protection is a major consideration in many of the Commission's Statewide Rules and is one of the primary purposes of Statewide Rule 8. The revisions proposed by the Commission under Chapter 4 and Statewide Rule 8 reflect the Commission's mission to serve Texas through our stewardship of natural resources and the environment. The proposed changes include streamlining of Statewide Rule 8 into the Commission's existing Chapter 4 regulations concerning environmental protection, updating requirements on the design, construction, operation, monitoring, and closure of waste management units, and improving the Commission's ability to track and collect data with respect to oilfield waste transported throughout Texas. The changes being proposed will provide clear direction to operators and Commission staff that will help protect environmental resources and the public across Texas." Read more. The RRC will also be holding in-person and virtual hearings on Oct. 26 and 27, 2023. The public comment period is open through November 3, 2023. Access the RRC rulemaking information page here.

### **STATE – Judicial**

Top and Bottom Leases - Oklahoma. On Sept. 19, the Oklahoma Supreme Court addressed a dispute where both parties sought equitable relief to adjudicate title based upon two oil and gas leases in Oil Valley Petroleum, LLC v. Moore (Case No. 2023 OK 90). In short, "Oil Valley claims its title is based upon a toplease and a release by a lessee of its interest in a well: and (2) Moore claims his title is based upon the base or bottom lease and production from that same well, with an added allegation of unclean hands by Oil Valley." The plaintiff had originally requested the trial court quiet title, cancel an oil and gas lease, and declare its top-lease to be in force and effect. The district court ruled in favor of Moore. Oil Valley appealed and the Court of Civil Appeals reversed the district court and directed judgment in their favor. Moore appealed to the Oklahoma Supreme Court.

Here, the Oklahoma Supreme Court held: "(1) exhibits presented during summary judgment proceedings were insufficient to show a material fact that a well was commercially profitable for the purpose of the habendum clause of an oil and gas lease; (2) an overriding royalty interest may be extinguished by an extinguishment of the working interest from which it was carved by a lessee's surrender of the lease in substantial compliance with the lease, unless the surrender is the result of fraud or breach of a fiduciary relationship; and (3) prevailing party status for the purpose of an attorney fee is determined by the trial court when not determined on appeal." Accordingly, the Oklahoma Supreme Court vacated the opinion of the Court of Civil Appeals and reversed the order granting Moore partial summary judgment in its favor, and remanded the case back to the trial court for additional proceedings. Read more.

### **INDUSTRY NEWS FLASH**

- ▶ America's Most Productive Oil and Gas
  Counties are Located in Texas. On Oct. 6,
  Texas business publication, El Paso Inc., reported
  that "The counties that produce the most oil and
  natural gas in all of America are in the Permian Basin
  in west Texas and southeastern New Mexico. Four
  of the top five Texas counties that produced the
  most crude oil in June were in the Permian Basin:
  Midland, Martin, Upton, and Howard, according to
  the latest data from the Texas Railroad Commission.
  Karnes County, southeast of San Antonio, located in
  the Eagle Ford Shale, produced the fifth-greatest
  amount of crude and fourth-greatest amount of
  natural gas." Read more.
- ▶ ExxonMobil to acquire Pioneer Natural
  Resources in a \$64.5 billion deal. Last week,
  ExxonMobil announced its acquisition of Pioneer
  Natural Resources in a \$64.5 billion stock deal "that
  more than doubles the oil and gas major's Permian
  basin footprint." As reported by the Oil & Gas Journal,
  "The merger, ExxonMobil's largest since acquiring
  Mobil two decades ago, adds Pioneer's more than
  850,000 net acres in Midland basin to ExxonMobil's

570,000 net acres in Delaware and Midland basins, 'creating the industry's leading high-quality undeveloped US unconventional inventory position,' that, together, hold an estimated 16 billion boe resource in the Permian, the companies said in a joint release Oct. 11." In a Bloomberg TV interview discussing the merger, Pioneer's CEO Scott Sheffield forecasted that "independent shale drillers won't be able to survive on their own long term," adding, "They're going to have to merge up, consolidate, and be part of diversified companies." Read more.

**▶** White House Prohibiting Administration Officials from Attending International Oil and Gas **Events.** On Oct. 2, Fox News reported on an internal Biden administration memo that prohibits "senior administration officials from traveling for international energy engagements that promote carbon-intensive fuels, including oil, natural gas and coal." Authored by Deputy Secretary of Energy David Turk, the memo states that "This guidance sets out a presumption that agencies and departments will pursue international energy engagement that advances clean energy projects. It also outlines a process for seeking limited exceptions to pursue carbon-intensive engagements on a justified geostrategic imperative or energy-fordevelopment/energy access basis." Read more.

### **LEGISLATIVE SESSION OVERVIEW**

### States in Session



Session Notes: Michigan, North Carolina, Ohio, Pennsylvania, and Wisconsin are in regular session. The U.S. Congress is also in session. Texas Republican Gov. Greg Abbott called the legislature into special session on Oct. 9. The special session is focusing on school choice, which would allow parents to use taxpayer dollars to remove their children from public schools. According to *The Texas Tribune*, Governor Abbott has threatened to primary any Republicans who block passage of school choice bills, but the proposal has previously faced resistance in the House from Democrats and rural Republicans. For the special session, most eyes will be on the 24 House Republicans who voted for anti-voucher budget amendments during the regular session.

The **Oklahoma** Senate abruptly adjourned their half of the <u>special session</u> called by Republican Gov. Kevin Stitt regarding the state's tax system on Oct. 3, without taking any action. The Senate's decision followed Governor Stitt's refusal to present before a Senate panel to discuss the sustainability of his tax cut plans and their potential impact on state finances, reports <u>KFOR</u>. The House reconvened for day two of the special session on Oct. 4 and <u>adjourned</u> until the call of the chair, meaning the House is technically still in special session. The House filed <u>18 shell bills</u> on Oct. 3 regarding taxation, but they will remain in limbo as the House cannot pass any legislation this special session without the Senate's participation.

Signing Deadlines (by date): California Democrat Gov. Gavin Newsom had until Oct. 14 to sign or veto legislation or it becomes law without signature.

Michigan Democrat Gov. Gretchen Whitmer has 14 days to act on legislation or it becomes law without signature. Pennsylvania Democrat Gov. Josh Shapiro has 10 days from presentment to act on legislation or it becomes law without signature.

The following states are currently holding 2023 interim committee hearings or studies: Alabama, Alaska, Arizona, Arkansas, California Assembly, Colorado, Connecticut, Delaware, Florida House and Senate, Georgia, Hawaii, Idaho, Illinois House and Senate, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Minnesota, Mississippi House and Senate, Missouri House and Senate, Montana, Nebraska, Nevada, New Hampshire House and Senate, New

Mexico, New York Assembly and Senate, North Dakota, Oklahoma House and Senate, Oregon, Rhode Island, South Carolina House and Senate, South Dakota, Tennessee, Texas House, Utah, Vermont, Virginia House, Washington, West Virginia and Wyoming.

The following states are currently posting 2023 bill drafts, pre-files and interim studies: <u>Alabama</u>, <u>Delaware</u>, <u>Florida</u>, <u>Georgia, Illinois House and Senate</u>, <u>Iowa</u>, <u>Nebraska</u>, <u>Nevada</u>, <u>New Hampshire</u>, <u>North Carolina</u>, <u>Oklahoma House</u> and <u>Senate</u>, <u>Tennessee</u>, <u>Utah</u> and <u>Wyoming</u>. ■

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