AAPL Powering The Profession

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GOVERNMENTAL AFFAIRS REPORT

FEDERAL – Legislative

S. 425 – Carbon Capture and Sequestration. On February 5, Sen. John Barrasso (R-WY) introduced S. 425, known as the Enhancing Energy Recovery Act. The bill would "create parity under the Section 45Q carbon capture tax credit by giving across-the-board, equal treatment for carbon captured for increased energy production, utilization, and sequestration." Read a detailed analysis of the IRS Section 45Q tax credit here and from the Carbon Capture Coalition here. According to Sen. Barrasso, "Using carbon for enhanced oil and natural gas recovery has proven to significantly increase energy production while reducing carbon emissions. Changes to Section 45Q made it harder for American energy producers and manufacturers to take advantage of this credit. Our bill will fix this policy and ensure equal treatment for energy production, utilization, and sequestration. By bolstering our national energy security, we can support Wyoming's energy workers and lower costs for Americans across the country." Read more.

S. 401 – Fair Access to Banking Act. On February 4, Sen. Kevin Cramer (R-D), along with 40 Republican cosponsors, introduced S. 401, known as the Fair Access to Banking Act. The bill seeks to address the recent "debanking" trend where financial institutions excluded certain industries and companies from utilizing their financial services. As noted by Sen. Cramer, "Banks and financial institutions use their economic standing to categorically exclude law-abiding, legal industries by refusing to lend or provide services to them. This includes industries such as firearms, ammunition, crypto, federal prison contractors, as well as energy producers." The bill addresses the issue by protecting "fair access to financial services and ensures banks operate in a safe and sound manner. The legislation requires that lending and services decisions must be based on impartial, risk-based analysis, not political or reputational favoritism." Specifically, "this legislation penalizes banks and credit unions with over $10 billion in total consolidated assets, or their subsidiaries, if they refuse to do business with any legally compliant, credit-worthy person. It also prevents payment card networks from discriminating against any qualified person because of political or reputational considerations. The bill requires qualified banks to provide written justification for why they are denying a person financial services." Read more.

H.J. Res. 35 / S.J. 12 – Methane Emissions Charge. On February 4, Rep. August Pfluger (R-TX) introduced H.J. Res. 35 and Sen. John Hoeven (R-ND) introduced identical Senate version, S.J. Res. 12, providing congressional disapproval of the Biden administration rule by the U.S. Environmental Protection Agency, *Waste Emissions Charge for Petroleum and Natural Gas Systems: Procedures for Facilitating Compliance, Including Netting and Exemptions* (89 Fed. Reg. 91094) that imposes a methane emissions charge (tax) on certain levels of methane emissions from oil and gas production as provided under the 2022 Inflation Reduction Act. Independent Petroleum Association of America (IPAA) President & CEO Jeff Eshelman issued a statement on the resolution saying, "IPAA appreciates Hoeven and Pfluger's leadership on the issue and that the CRA 'will allow Congress to nullify the regulations the Biden Administration established to implement the misguided methane tax. The Biden Administration and Democrats in Congress passed the methane tax to single out and punish the oil and natural gas industry despite its already burdensome EPA regulatory framework. The tax was passed without appropriate understanding of its impact or industry safeguards. IPAA has always opposed the methane tax and believe it is simply a tax designed to hamper American oil and gas production. We encourage Congress to work with the

Trump Administration to eliminate this unnecessary tax on American oil and natural gas producers as soon as possible.'" These resolutions mirror the legislation we covered in the last report introduced on January 16 by Sen. Ted Cruz seeking to repeal the methane emissions charge (tax), S. 143, known as the Natural Gas Tax Repeal Act. Read more.

FEDERAL – Regulatory

Interior Secretary Doug Burgum Signs First Round of Orders to Unleash American Energy. On February 3, Interior Secretary Doug Burgum signed a series of orders on his first day in office "marking the start of a new era focused on advancing American energy independence and ensuring the responsible stewardship of the nation's public lands and resources." Read more. According to Secretary Burgum's day one announcement, "Today marks the beginning of an exciting chapter for the Department of the Interior. We are committed to working collaboratively to unlock America's full potential in energy dominance and economic development to make life more affordable for every American family while showing the world the power of America's natural resources and innovation. Together, we will ensure that our policies reflect the needs of our communities, respect tribal sovereignty, and drive innovation that will keep the U.S. at the forefront of energy and environmental leadership." The announcement coincides with a series of agency orders: (1) Addressing the National Energy Emergency (Order No. 3417); (2) Unleashing American Energy (Order No. 3418); (3) Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis (Order No. 3419); (4) Announcing President Trump's revocation of former Outer Continental Shelf Withdrawals (Order No. 3420); (5) Achieving Prosperity Through Deregulation (Order No. 3421); and (6) Unleashing Alaska's Extraordinary Resource Potential (Order No. 3422). Access the announcement and a summary of each order here.

EPA Administrator Lee Zeldin Outlines Vision for Agency. On February 4, following his confirmation, U.S. Environmental Protection Agency (EPA) Administrator Lee Zeldin outlined his vision for the agency under the Trump administration, called the "Powering the Great American Comeback Initiative." According to the EPA, the initiative "consists of five pillars that will guide the EPA's work over the first 100 days and beyond." One of those pillars, Restore American Energy Dominance, is aimed at rolling back the prior administration's efforts to stymie domestic traditional energy development and production. Administrator Zeldin said, "Pursuing energy independence and energy dominance will cut energy costs for everyday Americans who are simply trying to heat their homes and put gas in their cars. This will also allow our nation to stop relying on energy sources from adversaries, while lowering costs for hardworking middle-income families, farmers, and small business owners. I look forward to working with the greatest minds driving American innovation, to ensure we are producing and developing the cleanest energy on the planet." Read more.

Energy Secretary Announces Acts to Unleash Golden Era of American Energy Dominance. On February 5, newly confirmed U.S. Secretary of Energy Chris Wright "signed his first Secretarial Order today directing the Department of Energy to take immediate action to unleash American Energy in accordance with President Trump's executive orders." Wright, previously the CEO of North America's second largest hydraulic fracturing company, Liberty Energy, said, "President Trump has outlined a bold and ambitious agenda to unleash American energy at home and abroad to restore energy dominance. To compete globally, we must expand energy production and reduce energy costs for American families and businesses. America must lead the world in innovation and technology breakthroughs, which includes accelerating the work of the Department's National Laboratories. We must also permit and build energy infrastructure and remove barriers to progress, including federal policies that make it too easy to stop projects and far too difficult to complete projects." Wright released a 9-point plan that includes returning to regular order on LNG exports; refiling the Strategic Petroleum Reserve; and streamlining permitting and identifying undue burdens on American energy, among other energy-related initiatives. Read more.

FTC Policy Guidance on Independent Contractor Protected Labor Activity. On January 14, the U.S. Federal Trade Commission (FTC) issued a policy enforcement statement, *Federal Trade Commission Enforcement Policy Statement on Exemption of Protected Labor Activity by Workers from Antitrust Liability*, clarifying that independent contractors engaged in collective bargaining activities are shielded from antitrust liability as is "the conduct of bona fide labor organizations engaged in labor disputes—i.e., organizing and bargaining over the terms and conditions of employment." In short, as provided by attorney Nathan Gibson in his *Employee or Independent Contractor* legal newsletter, "While employees engaging in protected labor activity has long been exempt from antitrust liability, the FTC's recent statement extends the exemption to independent contractors." Read more. As noted in the FTC statement, "It has long been clear that employees who are directly hired by an employer are protected from antitrust liability by the labor exemption when they are organizing or bargaining with that employer over their compensation and/or working conditions. More recently, however, the rise of independent contracting, and of 'gig work' in particular, has presented questions about the labor exemption's application to the organizing and bargaining of workers who are classified—or potentially misclassified—by a firm as independent contractors." Thee FTC "clarifies its view that the labor exemption's application does not turn on whether a worker is formally classified by a firm as an independent contractor under the Fair Labor Standards Act ('FLSA'), the National Labor Relations Act ('NLRA'), tax law, state common law, or any other law. Rather, workers' organizing and collective bargaining activity may be protected from antitrust liability when what is at issue is the compensation for their labor or their working conditions. Workers engaged in such protected activity are not categorically beyond the scope of the labor exemption from antitrust liability simply because they do not have a formal employer-employee relationship with the firm with whom they seek to negotiate over the compensation for their labor or their working conditions." It is yet unknown if the Trump administration will enforce this FTC guidance issued before he was inaugurated. Further, the statement provides that "This Policy Statement does not confer any rights on any person and does not operate to bind the FTC or the public. In any enforcement action, the Commission must prove the challenged act or practice violates one or more existing statutory or regulatory requirements. In addition, this Policy Statement does not preempt federal, state, or local laws." Read more.

FEDERAL – Judicial

BLM Oil and Gas Drilling Permits – California. On February 4, environmental groups sued the Bureau of Land Management (BLM) over its decision to "continue approving drilling permits for new oil and gas wells on public land in the San Joaquin Valley, California, without accounting for the cumulative impacts of BLM's expansion of oil and gas drilling, and without providing for meaningful input from the communities most impacted by its permitting decisions." In *Center for Biological Diversity v. U.S. Bureau of Land Management* (Case No. 1:25-at-00102), the litigants claim "that the federal agency's decision is at the expense of public health, the environment and the law. It adds that the bureau had never analyzed the harms of its well approvals on nearby communities." Among other relief, the groups seek to nullify the drilling permit approvals. The BLM has not yet responded to the complaint. Read more.

BLM Leases – Utah. On February 4, a federal court in Utah rejected the Southern Utah Wilderness Alliance's "challenge to the Interior Department's decision to offer 145 oil and gas leases covering more than 200,000 acres of public lands in Utah." The decision came in the long-running case, *Southern Utah Wilderness Alliance v. United States Department of the Interior* (Case No. 2:23-cv-00804-TC-DBP), related to the lawsuit filed in November 2023 by the Alliance claiming "that the approvals, which took place during the first Trump administration, lacked proper environmental analysis under the National Environmental Policy Act and violated the Administrative Procedure Act. Interior's Bureau of Land Management didn't analyze the direct, indirect, or cumulative impacts of its leasing decisions—including greenhouse gas emissions—or look at reasonable alternatives." In the latest decision, the court

ruled that the Alliance's claims "aren't ripe for judicial review because the agency's decision isn't a final action." According to the court, judicial action would be "premature" on these leases suspended for almost three years even if, as the Alliance argues, it's likely that the BLM will look to reinstate the leases and issue drilling permits. In short, the Alliance must wait until the BLM completes its supplemental environmental impact statement before they can proceed with legal action. The court wrote, "There is simply too much uncertainty about when and what type of drilling, if any, will occur on the land covered by the now-suspended leases." Read more.

BLM Leases; Sage-Grouse Habitat – Idaho; Nevada; Montana; Wyoming. On January 17, the U.S. Court of Appeals for the Ninth Circuit, in the consolidated cases *Montana Wildlife Federation v. Haaland* (No. 20-35609), "examined a number of oil and gas leases […] sold during the prior Trump administration, vacating some and overturning vacatur of others." The cases involved claims made pursuant to the National Environmental Policy Act (NEPA) and the public comment period for protecting lease sales under the Federal Land Policy and Management Act (FLPMA). As noted by law firm Manko, Gold, Katcher & Fox LLP, "The Ninth Circuit found that lease sales in the Idaho cases did violate NEPA's public participation process, but that Idaho's district court abused its discretion in vacating the subject leases due to the 'disruptive consequences' of vacatur significantly outweighing the seriousness of agency error in granting the leases. The court further found that lease sales in the Montana cases violated the public participation requirements of FLMPA and were inconsistent with the 2015 Plan, and that Montana's district court did not abuse its discretion when it determined that the seriousness of BLM's errors outweighed the disruptive consequences on leaseholders, ultimately upholding vacatur of those Montana lease sales." Manko, Gold, Katcher & Fox LLP notes that "Ultimately, the holding in this case offers insight into how courts may look to remedy agency errors, even after the agency's action has resulted in significant economic investment." Read more.

PHMSA LNG by Rail Regulations – Washington, DC. On January 17, the U.S. Court of Appeals for the D.C. Circuit "vacated a 2020 Pipeline and Hazardous Materials Safety Administration (PHMSA) rule—the 'Hazardous Materials: Liquefied Natural Gas by Rail Rule' (the LNG-by-Rail Rule)—that allowed for the transportation of liquefied natural gas (LNG) on rail cars." According to law firm K&L Gates, "The LNG-by-Rail Rule was challenged by a collection of environmental organizations, state governments, and tribal governments for failing to adequately consider the environmental impact of allowing LNG transport by rail." In the case, *Sierra Club v. U.S. Dept. of Transportation* (Case No. 20-1317), the court explained that "transporting LNG by rail entails a potent combination of risk and extreme danger that plainly has a significant impact on the environment. Although the probability of an accident 'may be low, that risk is sufficient that a person of ordinary prudence would take it into account in reaching a decision to approve the [agency action], and its potential consequences are therefore properly considered here.'" The court concluded that "PHMSA's decision not to prepare an EIS [environmental impact statement] was therefore arbitrary and capricious." Thus, the rule was vacated and remanded back to PHMSA for "further proceedings." As noted by K&L Gates, "The decision to limit the domestic transportation of LNG conflicts with President Trump's 'American Energy Dominance' agenda and the stated intentions of the nominee for secretary of energy to expand US LNG infrastructure," thus "this decision adds yet another element of regulatory uncertainty for domestic natural gas transportation as the second Trump administration prepares to implement its energy agenda." Read more.

STATE – Legislative

For the nearly 300 bills AAPL is currently monitoring and tracking for members, please see the continuously updated member-exclusive AAPL Governmental Affairs Bill Tracking Summary spreadsheet, available through the AAPLConnect LANDNEWS and Governmental Affairs Network member forums here or on the AAPL website here.

STATE – Regulatory

NMED Air Quality Bureau Operating Permits – New Mexico. On February 3, the New Mexico Environment Department (NMED) Air Quality Bureau in the Environmental Protection Division announced it has proposed "to repeal and replace 20.2.70 NMAC, *Operating Permits*, to address a mandate by the U.S. Environmental Protection Agency ('EPA') directing the removal of certain affirmative defense provisions in the New Mexico Title V Permit Program at 20.2.70.304 NMAC, *Emergency Provision*." For background, "on July 12, 2023 (88 FR 47029), the EPA removed the 'emergency' affirmative defense provisions from Clean Air Act ('CAA') operating permit program regulations at 40 CFR 70.6(g) (applicable to state/local/tribal permitting authorities) and 71.6(g) (applicable when EPA is the permitting authority). These provisions established an affirmative defense that stationary sources could have asserted to avoid liability in enforcement cases brought for noncompliance with technology-based emission limits contained in the source's Title V permit, provided that the source demonstrated that excess emissions occurred due to qualifying 'emergency' circumstances. These provisions, which have never been required elements of state operating permit programs, are being removed because they are inconsistent with the EPA's interpretation of the enforcement structure of the CAA in light of recent court decisions from the U.S. Court of Appeals for the D.C. Circuit, specifically the Court's decision in *NRDC v. EPA*, 749 F.3d 1055. (D.C. Cir. 2014)." For more information from NMED on their program implementation, Read more. The NMED's Air Quality Bureau is also accepting public comments on their proposed draft amendments to 20.2.70 NMAC, *Operating Permits*, by March 5, 2025. Access the NMED public comment portal here.

Governor Announces Six-Part Plan to Support Energy Initiatives – Pennsylvania. On January 30, Gov. Josh Shapiro (D) announced a "six-part 'lightning plan' aimed at increasing energy production, creating thousands of jobs and keeping costs down for Pennsylvanians." Read more. The governor "was flanked by many partners in the energy and labor industry, along with federal, state and local officials" when making the announcement. As reported by the *Pittsburgh Post-Gazette*, "Broadly speaking, Mr. Shapiro's six-part plan aims to streamline permitting and regulatory processes for projects, expand on existing state tax credit programs for those who want to become more energy efficient, and update renewable energy standards." Read more.

RRC Brine Regulations – Texas. On January 29, the Texas Railroad Commission (RRC) adopted "new 16 Texas Administrative Code §3.82, relating to Brine Production Projects and Associated Brine Production Wells and Class V Spent Brine Return Injection Wells." Read more. According to the RRC, "New Section 3.82 implements the requirements of Senate Bill 1186 (88th Legislature, Regular Session, 2023), which amended Texas Water Code §27.036 to clarify the Commission's jurisdiction over brine mining under state law. The Commission has jurisdiction over brine mining by injecting fluid to dissolve subsurface salt formations and then extracting the salts from the resulting artificial brines. The bill clarified that the Commission's jurisdiction over brine mining includes the authority to regulate brine production wells and brine injection wells ('spent brine return injection wells') used for lithium mining, which requires re-injecting naturally occurring brines into the formation from which they were produced after the extraction of minerals. The new rule will allow the Commission to seek primary enforcement authority from the EPA for the spent brine return injection wells, which are Class V UIC wells." The rulemaking also makes "corresponding amendments to various rules in Chapter 3." Those amendments relate to Organization Report; Retention of Records; Notice Requirements; Application To Drill, Deepen, Reenter, or Plug Back; Strata To Be Sealed Off; Directional Survey Company Report; Casing, Cementing, Drilling, Well Control, and Completion Requirements; Log and Completion or Plugging Report; Pressure on Bradenhead; Gas Well Gas and Casinghead Gas Shall Be Utilized for Legal Purposes; Oil, Gas, Brine, or Geothermal Resource Operation in Hydrogen Sulfide Areas; Pipeline Connection; Cancellation of Certificate of Compliance; Severance; Fees and Financial Security

Requirements; and Class III Brine Mining Injection Wells." The rulemaking is effective February 18, 2025. Read more.

STATE – Judicial

Independent Contactors; Arbitration Agreements – California. On December 30, 2024, the California Court of Appeal, Second Appellate District, ruled in favor of employers when it held in *Leeper v. Shipt, Inc.* (Case No. B339670) that in an independent contractor misclassification case that under the relevant statute, the Private Attorneys General Act of 2004 (PAGA), that "'every PAGA action necessarily includes an individual PAGA claim' – i.e., a representative PAGA claim cannot exist without its individual companion." At issue was a plaintiff seeking to bring a cause of action, avoiding the arbitration agreement, for "civil penalties for all allegedly aggrieved employees except themself. Thus, these actions seek to circumvent the obligation to arbitrate an employee's individual PAGA claim by abandoning it in favor of the representative claims that represent the real bounty." As noted by attorney Nathan Gibson in his *Employee or Independent Contractor* newsletter, "Fortunately, the decision makes clear that there is no such thing as a representative-only, arbitration-proof PAGA action." Read more.

Leasing; Gas Gathering Contracts – Colorado. On February 5, law firm Spencer Fane published an analysis of a 2024 Colorado Court of Appeals case "that could have significant implications for contract termination and implied covenant claims in the energy sector." In *Renegade Oil & Gas Company, LLC v. Anadarko Petroleum Corporation* (Case No. 23CA-0129), "Renegade alleged that Anadarko entities improperly terminated gas gathering contracts to undermine Renegade's oil and gas leases." These claims by Renegade "stemmed from Anadarko's decision to shut down its gas gathering system, effectively terminating Renegade's ability to transport and process gas under existing contracts." The appellate court affirmed the trial court's judgment in favor of Anadarko, rejecting Renegade's arguments. As noted by Spencer Fane, "The *Renegade* decision underscores two critical points for practitioners in the oil and gas industry and beyond: Termination Clauses Matter: Clear and unequivocal termination rights will be upheld, even against allegations of bad faith conduct [and] Limitations on Implied Covenants: Courts will not use the implied covenant of good faith and fair dealing to rewrite or supplement explicit contract terms." Read more.

Risk Penalties; Unitization – North Dakota. On February 3, law firm Oliva Gibbs LLP published a legal article on a recent North Dakota Supreme Court decision involving whether "nonconsent risk penalties must be assessed on a well-by-well basis or can be recovered from overall unit production." In *Liberty Petroleum Corp. v. North Dakota Industrial Commission* (Case No. 2024 ND 183), the North Dakota Supreme Court agreed with the North Dakota Industrial Commission's (NDIC) "approval of a unit plan that allowed risk penalties to be recovered from unit production as opposed to limiting recovery to the specific nonconsent well." The court noted that "NDIC found the plan for unitization is in the public interest, protective of correlative rights, and reasonably necessary to increase the ultimate recovery of oil and gas and prevent waste. NDIC found the two-phase allocation formula compensating owners for production protects correlative rights." The takeaway, according to Oliva Gibbs: "This holding allows operators more flexible accounting procedures when it comes to calculating payout thresholds at the DSU [drilling and spacing unit] or unitized level. It may be particularly useful for situations where a party has consented to some wells and is being carried or has 'gone nonconsent' in others. Note that this case addressed recovering risk penalties allocable to prior DSUs when they have been 'dissolved' into a larger, unitized area covering a common source of supply. The court holds that risk penalties can be recovered on unitized (or pooled) lands at the unit level as opposed to the well level, regardless of when the penalties accrued." Read more.

Produced Water Ownership – Texas. The Texas Supreme Court recently announced it will hear a petition for review involving the question of ownership

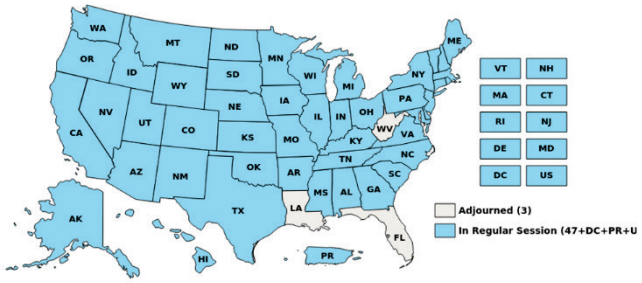
of produced water arising from a hydraulic fracturing operation in *Cactus Water Services, LLC v. COG Operating, LLC* (Case No. 23-0676). As noted by the Texas Civil Justice League, the case centers around whether the operator or surface owner has the rights to the produced water. For background, "The trial court granted summary judgment for COG, declaring that COG owned the oil, gas, and other products contained in the commercial oil and gas bearing formations and has the right to exclusive possession, custody, control, and disposition of its product stream, including produced water. Cactus appealed." The Eighth Court of Appeals (El Paso) affirmed the trial court decision. "Cactus argued, in brief, that the mineral leases only gave COG the right to 'oil, gas and other hydrocarbons,' not to produced water from oil-and-gas bearing formations. It argued further that the leases (which did not define 'water') do not permit COG to sell produced water to third parties for off-premises use because 'water is not a hydrocarbon' and 'was not conveyed as part of the mineral estate.' COG, on the other hand, asserted that 'the leases must be construed to effectuate the parties' general intent to convey oil and gas in their natural form,' and that 'natural form' constitutes a 'product stream' that contains a waste byproduct known as produced water. The majority, consequently, had to decide 'whether 'produced water' is, as a matter of law, water or if it is waste.'" After losing at both the trial and appellate levels, Cactus petitioned the Texas Supreme Court for review. The court has scheduled oral argument for March 18, 2025, and we will keep AAPL members updated as the case progresses. Read more.

INDUSTRY NEWS FLASH

▶ **IPAA appoints new chairman.** The Independent Petroleum Association of America (IPAA) announced that Michael "Mike" A. Hillebrand has been appointed IPAA Chairman for a two-year term through 2026. Hillebrand is the CEO of Pennsylvania-based Huntley & Huntley. As reported by *World Oil*, Hillebrand's firm is "one of the world's oldest and continuously existing oil and gas companies," founded in 1912. Read more.

LEGISLATIVE SESSION OVERVIEW

States in Session



Session Notes: Alabama, **Alaska**, **Arizona**, **Arkansas**, **California**, **Colorado**, **Connecticut**, **Delaware**, **Georgia**, **Hawaii**, **Idaho**, **Illinois**, **Indiana**, **Iowa**, **Kansas**, **Kentucky**, **Maine**, **Maryland**, **Massachusetts**, **Michigan**, **Minnesota**, **Mississippi**, **Missouri**, **Montana**, **Nebraska**, **Nevada**, **New Hampshire**, **New Jersey**, **New Mexico**, **New York**, **North Carolina**, **North Dakota**, **Ohio**, **Oklahoma**, **Oregon**, **Pennsylvania**, **Rhode Island**, **South Carolina**, **South Dakota**, **Tennessee**, **Texas**, **Utah**, **Vermont**, **Virginia**, **Washington**, **Wisconsin** and **Wyoming** are in regular session. The **U.S.** Congress is also in session.

The following are scheduled to convene for the 2025 legislative session on the dates provided: **West Virginia** (February 12); **Florida** (March 4) and **Louisiana** (April 14).

Virginia is scheduled to adjourn its 2025 legislative session on February 22.

California adjourned its special session on February 3 after passing legislation to fund legal battles. According to the Associated Press, the legislature approved $50 million for legal cases against Trump administration policy; $25 million is set aside for court cases through the Department of Justice while the other $25 million is for legal groups to defend immigrants who face possible deportation.

The following states are currently holding interim committee hearings or studies: **Louisiana** and **West Virginia**. ■

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