

COMMENTS FOR OMB/ ICR

Requirements for Site Security and Production Handling; Applying for Commingling and Allocation Approval

March 2, 2026

Bill Groffy
Acting Director
Bureau of Land Management
1849 C St. NW, Room 5646
Washington, DC 20240

RE: Comments Provided by the Theodore Roosevelt Conservation Partnership on the Bureau of Land Management [Requirements for Site Security and Production Handling; Applying for Commingling and Allocation Approval](#). Docket No. BLM-2025-0070.

Dear Acting Director Groffy:

Thank you for the opportunity to comment on the Bureau of Land Management's (BLM) proposed rule to revise the requirements for production handling that apply to commingling and allocation approvals. The Theodore Roosevelt Conservation Partnership (TRCP) is a national hunting and fishing conservation organization working to guarantee all Americans quality opportunity to hunt and fish. We work with 64 formal partners and represent over 145,000 individual members nationally to advance America's legacy of conservation, habitat, and access.

Hunters and anglers have a long history of advocating for responsible energy development. The TRCP understands that the proposed rule is necessary to incorporate the fiscal reforms contained in the One Big Beautiful Bill pertaining to commingling the production of various mineral owners including Federal, Indian, and private leases, and to reflect changes in oil and gas measurement practices and technology since 2016. The TRCP believes that changes can be made to commingling application requirements in a manner that:

1. increases the accuracy and efficiency of reporting on the development of an oil or gas lease;
2. encourages centralized development to foster a reduction in surface impacts from development and increase opportunities to adjust site selection to avoid or minimize impacts to fish and wildlife; and

3. ensures accurate royalty payments that benefit state governments, statutorily created federal funds, and the U.S. Treasury.

In order to achieve the above outcomes, the TRCP provides the below recommendations for inclusion in the BLM's final rule.

Ensure Standardization and Best Available Science

TRCP recommends that the BLM refer to the best available science and technology when commingling technology is installed to reduce error and promote transparency in the reporting process.

Efficiency in the oil and gas production process on public lands can lead to environmental benefits when those changes are made based on the best available science and technology, with a robust public input process. The current rule acknowledges that technology used to measure the outputs of an oil and gas lease has changed since the current regulations were promulgated in 2016. However, the current rule does not specify the changes that were made to that technology, nor does it specify a clear process for standardizing the use of these tools in the metering process. We recommend that the BLM include in the final rule a guarantee of standardization and approval process of the technologies being used to meter the outputs of these commingled wells to ensure accurate reporting in the quality and quantity of oil and gas products across leases and ownerships. Standardization is important because it will ensure fairness and consistency in the reporting process that industries and citizens can rely on.

In the current rule, the sole requirement for testing the quality of the product being extracted is the previous year's analysis. A more fair and accurate representation of the quality of oil or gas being extracted would be achieved by including multiple years of quality testing data at that site. This would ensure accurate reporting once the development is commingled. We request that the BLM include in the final rule at Section 3173.15(k) a requirement of multiple years of data for gas analysis or oil gravity. By taking an average of the previous few years, the BLM can better understand the quality of the minerals being produced at that site.

Encourage Development that Avoids and Minimizes Impacts to Fish and Wildlife Through Reduced Development Footprint

TRCP supports a reduction in the development footprint that could result from an increase in commingling applications being approved. Commingling could potentially reduce the impacts on wildlife by decreasing the number of people needed on site for monitoring purposes, as well as reducing the amount of traffic in developed oil and gas fields.

Ensure Accurate Reporting and Payments that Benefit the Public

Royalty payments constitute the largest source of federal revenues collected from oil and natural gas leases and, consequently, they form the largest source of funds to be disbursed. Funds are distributed (except for Alaska) as: approximately 50% to states where the development occurs, approximately 40% into the Reclamation Fund that supports water infrastructure projects on Bureau of Reclamation lands, and approximately 11% into the U.S. Treasury to benefit the American taxpayer. We strongly recommend that the final rule include requirements for accurate reporting of commingled leases that ensures fair compensation to states and taxpayers.

The BLM acknowledges in the proposed rule that a variance in production metering could result in a 5% loss of revenue for taxpayers. Along with the potential for error, states that produce higher quality oil and gas must be assured that their product, if commingled with lower quality products, is being sold at a rate of return that benefits taxpayers within that state.

Conclusion

Advancements in technology have always outpaced our nation's ability to write regulations addressing these changes. The TRCP supports the BLM's efforts to incorporate advanced technology in the oil and gas production metering process, and requests this regulation do so in a manner that incentivizes a reduction in development footprint, addresses the limits of the existing technology, and fairly compensates taxpayers. We appreciate the effort to reduce unnecessary administrative costs and minimize conflicts with other multiple uses – including fish and wildlife resources important to hunters and anglers. We look forward to working with the BLM as you complete the final rule and to ensure these reforms are effectively implemented.

Sincerely,

McKay Fleck
Energy Policy Advisor
Theodore Roosevelt Conservation Partnership