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Description of document: Department of the Interior (DOI) Each Assistant Secretary's Action Plans provided in response to Executive Order 14154 or the Secretary's Order 3418, 2025

Requested date: 23-March-2025

Release date: 09-May-2025

Posted date: 26-May-2025

Source of document: FOIA Request  
Department of the Interior  
Office of the Secretary  
FOIA Officer  
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Washington, DC 20240  
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United States Department of the Interior  
OFFICE OF THE SECRETARY  
Washington, DC 20240

May 9, 2025

Via Electronic Mail.

RE: Freedom of Information Act (FOIA) Request No. DOI-2025-004926

The Office of the Secretary (OS) FOIA Office received your FOIA request, dated March 23, 2025, on March 24, 2025 and assigned it control number DOI-2025-004926. Please cite this number in any future communications with our office regarding your request.

**Description of the Requested Records**

You requested:

“Order 3418 of the Secretary of the Interior directed each Assistant Secretary to provide an action plan to the Secretary of the Interior to carry out the policy of Executive Order 14154 entitled Unleashing American Energy. I request a copy of each Assistant Secretary's Action plan provided to the Secretary of the Interior in February or March 2025 under Order 3418. This should include the Assistant Secretary for Policy, Management and Budget, for Land and Minerals Management, for water and Science, for Fish, Wildlife and Parks, for Indian Affairs, etc. I also request a copy of the action plan or action plans developed by the Secretary of the Interior under Executive Order 14154 to suspend, revise or rescind all agency actions identified as unduly burdensome under Section 3 of Executive Order.”

**Partial Release**

We are writing to respond to your request.

The records you requested are publicly available on the OS FOIA Library website at:  
<https://www.doi.gov/foia/os/other-records>

Portions of these materials are being withheld under the following FOIA Exemption:

**Exemption 5**

Exemption 5 allows an agency to withhold “inter-agency or intra-agency memorandums or letters which would not be available by law to a party ... in litigation with the agency.” [5 U.S.C. § 552\(b\)\(5\)](#). Exemption 5 therefore incorporates the privileges that protect materials from discovery in litigation, including the deliberative process, attorney work-product, attorney-client, and commercial information privileges. We are withholding pages in part under Exemption 5 because they qualify to be withheld both because they meet the Exemption 5 threshold of being inter-agency or intra-agency and under the following privileges:

#### *Attorney-Client Privilege*

The attorney-client privilege protects confidential communications between an attorney and his client relating to a legal matter for which the client has sought professional advice and is not limited to the context of litigation. Moreover, although it fundamentally applies to confidential facts divulged by a client to his/her attorney, this privilege also encompasses any opinions given by an attorney to his/her client based upon, and thus reflecting, those facts, as well as communications between attorneys that reflect confidential client-supplied information. The information that has been withheld under the attorney-client privilege of Exemption 5 constitutes confidential communications between agency attorneys and agency clients, related to legal matters for which the client sought professional legal assistance and services. Additionally, the BOEM employees who communicated with the attorneys regarding this information were clients of the attorneys at the time the information was generated and the attorneys were acting in their capacities as lawyers at the time they communicated legal advice. Finally, the BOEM has held this information confidential and has not waived the attorney-client privilege.

#### *Deliberative Process Privilege*

The deliberative process privilege protects the decision-making process of government agencies and encourages the frank exchange of ideas on legal or policy matters by ensuring agencies are not forced to operate in a fish bowl. A number of policy purposes have been attributed to the deliberative process privilege, such as: (1) assuring that subordinates will feel free to provide the decisionmaker with their uninhibited opinions and recommendations; (2) protecting against premature disclosure of proposed policies; and (3) protecting against confusing the issues and misleading the public.

The deliberative process privilege protects materials that are both predecisional and deliberative. The privilege covers records that reflect the give-and-take of the consultative process and may include recommendations, draft documents, proposals, suggestions, and other subjective documents which reflect the personal opinions of the writer rather than the policy of the agency.

The materials that have been withheld under the deliberative process privilege of Exemption 5 are both predecisional and deliberative. They do not contain or represent formal or informal agency policies or decisions. They are the result of frank and open discussions among employees of the Department of the Interior. Their contents have been held confidential by all parties and public dissemination of this information would have a chilling effect on the agency’s deliberative processes; expose the agency’s decision-making process in such a way as to

discourage candid discussion within the agency, and thereby undermine its ability to perform its mandated functions.

The deliberative process privilege does not apply to records created 25 years or more before the date on which the records were requested.

Leah Fairman, FOIA Officer, Office of the Secretary, is responsible for this denial.

Tanya Munson, Attorney-Advisor, Office of the Solicitor, Department of the Interior, Washington, D.C. was consulted.

We reasonably foresee that disclosure would harm an interest protected by one or more of the nine exemptions to the FOIA's general rule of disclosure.

### **Fees—No Charge**

We do not bill requesters for FOIA processing fees when their fees are less than \$50.00, because the cost of collection would be greater than the fee collected. *See* [43 C.F.R. § 2.37\(g\)](#). Therefore, there is no billable fee for the processing of this request.

### **Appeal Rights**

You may appeal this response to the Department's FOIA/Privacy Act Appeals Officer. If you choose to appeal, the FOIA/Privacy Act Appeals Officer must receive your FOIA appeal **no later than 90 workdays** from the date of this final response. Appeals arriving or delivered after 5 p.m. Eastern Time, Monday through Friday, will be deemed received on the next workday.

**Your appeal must be made in writing.** You may submit your appeal and accompanying materials to the FOIA/Privacy Act Appeals Officer by mail, courier service, fax, or email. All communications concerning your appeal should be clearly marked with the words: "FREEDOM OF INFORMATION APPEAL." You must include an explanation of why you believe this response is in error. You must also include with your appeal copies of all correspondence between you and the Office of the Secretary concerning your FOIA request, including your original FOIA request and this response. Failure to include with your appeal all correspondence between you and the Office of the Secretary will result in the Department's rejection of your appeal, unless the FOIA/Privacy Act Appeals Officer determines (in the FOIA/Privacy Act Appeals Officer's sole discretion) that good cause exists to accept the defective appeal.

Please include your name and daytime telephone number (or the name and telephone number of an appropriate contact), email address and fax number (if available) in case the FOIA/Privacy Act Appeals Officer needs additional information or clarification of your appeal.

### *DOI FOIA/Privacy Act Appeals Office Contact Information*

Department of the Interior  
Office of the Solicitor



1849 C Street, N.W.  
MS-6556 MIB  
Washington, DC 20240

Attn: FOIA/Privacy Act Appeals Office

Telephone: (202) 208-5339  
Fax: (202) 208-6677  
Email: [FOIA.Appeals@sol.doi.gov](mailto:FOIA.Appeals@sol.doi.gov)

### **Mediation Services**

The 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS in any of the following ways:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road – OGIS  
College Park, MD 20740-6001

Email: [ogis@nara.gov](mailto:ogis@nara.gov)  
Web: <https://www.archives.gov/ogis>  
Telephone: (202) 741-5770  
Fax: (202) 741-5769  
Toll-free: (877) 684-6448

Please note that using OGIS services does not affect the timing of filing an appeal with the Department's FOIA & Privacy Act Appeals Officer.

Contact information for the Department's FOIA Public Liaison, who you may also seek dispute resolution services from, is available at <https://www.doi.gov/foia/foiacenters>.

### **Conclusion**

This concludes our response to your request.

If you have any questions about this letter, you may contact me by email at [os.foia@ios.doi.gov](mailto:os.foia@ios.doi.gov), or by mail at U.S. Department of the Interior, 1849 C Street, NW, MS-7328, Washington, D.C. 20240. Additionally, contact information for the Department's FOIA Requester Centers and FOIA Public Liaison is available at <https://www.doi.gov/foia/foiacenters>.  
Sincerely,

LEAH  
FAIRMAN  
N

Digitally signed  
by LEAH  
FAIRMAN  
Date: 2025.05.09  
16:35:21 -04'00'

Leah Fairman  
FOIA Officer  
Office of the Secretary  
FOIA Office

**Title:** Assistant Secretary for Fish and Wildlife and Parks Action Plan for Secretary's Order (SO) 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

**Summary:** In accordance with Secretary's Order 3419, the National Park Service (NPS) reviewed its programs and regulations to identify those that may result in higher costs for the American people. While the NPS does not have regulatory authority for activities that occur beyond park boundaries that directly or indirectly increase costs of housing, healthcare, home appliances, energy, or the cost of food, the top priorities below will ensure the NPS is supporting relief to American families and defeating the cost-of-living crisis.

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

(b) (5)

(b) (5)

**Additional Information:** None

Assistant Secretary for Fish and Wildlife and Parks Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

<b>Responsive to</b>	SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis
<b>Accountable</b>	Assistant Secretary for Fish and Wildlife and Parks, National Park Service
<b>Initiative</b>	
Sec. 4 – <b>Implementation.</b> 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 on 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
Partner with Gateway Communities	EXPLORE Act Sec 131	(b) (5)			
Milestones		Due Date	Measurable Metrics		

(b) (5)



(b) (5)

Assistant Secretary for Fish and Wildlife and Parks Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

<b>Responsive to</b>	SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
<b>Accountable</b>	Assistant Secretary for Fish and Wildlife and Parks, National Park Service				
<b>Initiative</b>					
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<b>Policy goal(s)</b>	<b>Legal Authority</b>	<b>Recommendation</b>	<b>Barriers to Overcome</b>	<b>Metrics for Success</b>	<b>Final Due Date</b>
Timely Award of Disaster Relief Grants	54 U.S.C. 3001 et seq. (National Historic Preservation Act); American Relief Act, 2025; Public Law 118-158	(b) (5)			

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



(b) (5)

Assistant Secretary for Fish and Wildlife and Parks Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

<b>Responsive to</b>	SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
<b>Accountable</b>	Assistant Secretary for Fish and Wildlife and Parks, National Park Service				
<b>Initiative</b>					
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<b>Policy goal(s)</b>	<b>Legal Authority</b>	<b>Recommendation</b>	<b>Barriers to Overcome</b>	<b>Metrics for Success</b>	<b>Final Due Date</b>
Increase housing supply and job creation through Historic Tax Credit	26 CFR 47 of the Internal Revenue Code and 36 CFR 67 of NPS	(b) (5)			

(HTC) Program	program regulations				
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Milestones	Due Date	Measurable Metrics			
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Assistant Secretary for Fish and Wildlife and Parks 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	Assistant Secretary for Fish and Wildlife and Parks, National Park Service
Initiative	



**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 on 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
Housing	54 U.S.C. 100507 5 U.S.C. 5911	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

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Assistant Secretary for Fish and Wildlife and Parks 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	Assistant Secretary for Fish and Wildlife and Parks, National Park Service				
Initiative					
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Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Reducing the cost of insurance	EXPLORE Act Section 319	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					

(b) (5)


**Title:** Assistant Secretary for Fish and Wildlife and Parks Action Plan for SO 3423 and SO 34 – Unleashing Alaska’s Extraordinary Resources Potential

**Summary:** Consistent with Executive Order 14153, the NPS will rescind the rule titled “Alaska; Hunting and Trapping in National Preserves” (89 Fed. Reg. 55059) (“2024 Rule”) and reinstate the rule titled “Alaska; Hunting and Trapping in National Preserves” (85 Fed. Reg. 35181) (“2020 Rule”).

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

Rescind the 2024 Rule and reinstate the 2020 Rule. This will ensure compliance with EO 14153 and SO 3422.

**Additional Information:**

- On October 23, 2015, the National Park Service (NPS) published a final rule titled “Alaska; Hunting and Trapping in National Preserves” (80 Fed. Reg. 64325) (“2015 Rule”) prohibiting certain harvest practices on national preserves in Alaska, such as taking bears over bait and shooting swimming caribou.
- In 2018, the NPS was directed to revisit the 2015 Rule, resulting in publication on June 9, 2020, of a final rule titled “Alaska; Hunting and Trapping in National Preserves” (85 Fed. Reg. 35181) (“2020 Rule”), which rescinded the 2015 Rule.
- On February 17, 2022, the Assistant Secretary for Fish and Wildlife and Parks directed the NPS to initiate a rulemaking to reconsider the 2020 Rule and further directed the NPS to conduct tribal consultation to inform a new rule. This direction resulted in the publication on July 3, 2024, of a final rule titled “Alaska; Hunting and Trapping in National Preserves” (89 Fed. Reg. 55059) (“2024 Rule”). The 2024 Rule became effective on August 2, 2024.
- The 2024 Rule contained two substantive changes from the 2020 Rule. The 2024 Rule prohibited bear baiting in national preserves in Alaska and clarified trapping regulations (allowing the use of firearms to dispatch a wounded animal).
- On January 20, 2025, Executive Order 14153 titled “Unleashing Alaska’s Extraordinary Resource Potential” directed the NPS to rescind the 2024 Rule and reinstate the 2020 Rule, in its original form.
- On February 3, 2025, the Secretary of the Interior issued Secretary’s Order No. 3422 directing the Assistant Secretary for Fish and Wildlife and Parks, within 15 days of the issuance of the Order, to submit an action plan that describes the necessary and appropriate steps to execute the direction in EO 14153 to rescind the 2024 Rule and reinstate the 2020 Rule.
- Rescinding one rule and reinstating another requires a new notice and comment rulemaking process that involves publication of a proposed rule in the Federal Register, receipt and consideration of comments on that rule, revision of the proposed rule as



appropriate, and then publication of a final rule in the Federal Register with information regarding any changes made to the proposed rule and other matters. There are several other compliance processes that must be conducted as part of the rulemaking process (included but not limited to NEPA and tribal consultation). A draft schedule for completing the rulemaking process is provided below.

- The 2020 Rule has been the subject of litigation. Following the process outlined above (and further detailed below in the Milestones) will maximize the likelihood of a durable 2020 Rule reinstatement. In 2021, several environmental groups filed a lawsuit (*Alaska Wildlife Alliance v. Haaland*) challenging the 2020 Rule, arguing it was inconsistent with the NPS Organic Act and ANILCA and that the NPS did not adequately explain the shift in the agency's position. The U.S. District Court for the District of Alaska found the 2020 Rule to be unlawful on several grounds, and on September 30, 2022, the Court remanded the rule to the NPS without vacating it. The State filed a notice of appeal on November 29, 2022. On November 22, 2024, the Ninth Circuit dismissed the appeal as moot, vacated the district court's September 30, 2022, judgment, and denied without prejudice Plaintiffs' request for a provision tolling the statute of limitations for challenges concerning the 2020 Rule.

Assistant Secretary for Fish and Wildlife and Parks Action Plan for SO 3422 – Unleashing Alaska's Extraordinary Resource Potential

<b>Responsive to</b>	Executive Order 14153 Unleashing Alaska’s Extraordinary Resource Potential Secretary’s Order 3422 Unleashing Alaska’s Extraordinary Resource Potential				
<b>Accountable</b>	NPS Alaska Regional Office, NPS Division of Regulations, Jurisdiction, and Special Park Uses, DOI Solicitor Alaska Region				
<b>Initiative</b>					
Sec. 6 (b) - Within 15 days of the issuance of the Order, the Assistant Secretary for Fish and Wildlife and Parks will submit an action plan to me describing the necessary and appropriate steps to execute the direction regarding the agency actions in section 3(b)(xi), (xix), and (xx) of EO 14153.					
<b>Policy goal(s)</b>	<b>Legal Authority</b>	<b>Recommendation</b>	<b>Barriers to Overcome</b>	<b>Metrics for Success</b>	<b>Final Due Date</b>
Recission of 2024 Rule and reinstatement of 2020 Rule	U.S.C., title 16, secs. 1–4; 39 Stat. 535, 54	(b) (5)			

	U.S.C. 100101(a) 16 U.S. Code § 3102 Sec. 1313-1320		(b) (5)		
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Milestones	Start Date	Completion Date	Measurable Metrics
Action	Target Start Date for Action	Target Completion Date for Action	Metrics that will measure success for each action being taken by each due date.

(b) (5)
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(b) (5)



(b) (5)

Assistant Secretary for Fish and Wildlife and Parks Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

<b>Responsive to</b>	Executive Order 14153 Unleashing Alaska’s Extraordinary Resource Potential Secretary’s Order 3422 – Unleashing Alaska’s Extraordinary Resource Potential				
<b>Accountable</b>	National Park Service, DOI Solicitor’s Office, DOI Alaska Solicitor				
<b>Initiative</b>					
Sec. 6 (b) - Within 15 days of the issuance of the Order, the Assistant Secretary for Fish and Wildlife and Parks will submit an action plan to me describing the necessary and appropriate steps to execute the direction regarding the agency actions in section 3(b)(viii), (xix), and (xx) of EO 14153.					
<b>Policy goal(s)</b>	<b>Legal Authority</b>	<b>Recommendation</b>	<b>Barriers to Overcome</b>	<b>Metrics for Success</b>	<b>Final Due Date</b>
Reinstate the record of decision signed on July 23, 2020, by the Bureau of Land Management and United	Provide legal citation: 16 USC Ch. 51: Alaska National Interest Lands Conservation	(b) (5)			

States Army Corps of Engineers entitled “Ambler Road Environmental Impact Statement Joint Record of Decision.	Act, Section 201(4)(d)	(b) (5)		
Milestones	Due Date	Measurable Metrics		
State Action That Needs to Be Taken	List Target Due Date for Action	Define metrics that will measure success for each action being taken by each due date.		
(b) (5)				

## **Assistant Secretary for Fish and Wildlife and Parks Action Plan for SO 3417 – Addressing the National Energy Emergency, and SO 3418 – Unleashing American Energy**

### **Summary:**

In accordance with Secretary's Orders 3417 and 3418, the National Park Service (NPS) reviewed its relevant emergency and other legal authorities that pertain to the energy and critical minerals identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation capacity of the United States, and identified ways to reduce barriers and streamline processes.

The NPS does not have regulatory authority for activities that occur beyond park boundaries, including energy development. The NPS does work cooperatively with other agencies, jurisdictions, and stakeholders to promote clean and safe energy development while providing decision-makers with information about National Park System resources. This engagement is advisory and collaborative and promotes more efficient and effective energy development while avoiding potential impacts to national park resources. Through this engagement, the NPS does not implement or introduce any regulatory requirements on energy development.

The most significant statutory direction that guides NPS engagement in energy development is the NPS Organic Act of 1916 (54 U.S.C. §100101). Under this statute, the NPS is directed to manage units of the National Park System "to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Recognizing that units of the National Park System are part of broader communities and landscapes, the NPS carries out statutory direction by working cooperatively with other federal agencies, states, industry, private landowners, and other stakeholders to collectively identify strategies that can avoid or reduce potential impacts to park resources and values.

Other federal statutes also guide NPS engagement with other agencies, including the National Environmental Policy Act (NEPA), the Surface Mining Control and Reclamation Act, the Clean Air Act, the Clean Water Act, and the National Historic Preservation Act. When appropriate, the NPS may also participate in state actions under state law and regulations in carrying out the NPS mission.

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

(b) (5)

**Additional Information:**

The NPS has the following additional authorities and programs that support and facilitate energy development within park units.

**A. 9A REGULATIONS – 36 CFR PART 9, SUBPART A, MINING AND MINING CLAIMS**

**Legal And Emergency Authorities Available to Facilitate and Expedite Energy Production Actions**



Mining claims are authorized under the General Mining Law of 1872, 30 U.S.C. § 21 et seq. Although park units are withdrawn by law from the location of new mining claims, approximately 1,102 mining claims remain in 15 park units, primarily in Alaska and the California desert. Most of these rights pre-date the creation of the park units. These rights include mining claims, leasing of federal minerals, and other nonfederal minerals such as sand and gravel. The laws and regulations which apply to a particular mining operation depend on the nature of the underlying property right and the minerals that a prospective operator is seeking to develop.

The Mining in the Parks Act of 1976, 16 U.S.C. § 1901 et seq., directed the NPS to promulgate regulations to control activities related to mining claims in parks. Codified at 36 C.F.R. Part 9, Subpart A, these regulations direct mining claimants to obtain NPS approval of a plan of operations for mineral exploration, access, development, and reclamation. The regulations also require that operators post a bond to ensure that reclamation will be completed at the operator's, rather than the taxpayer's, expense. An approved plan of operations serves as a claimant's permit to operate.

Operations on mining claims in park units are rare; currently less than five operations are taking place across the National Park System.

### ***Federal Mineral Leasing***

Federal mineral leasing is allowed in three units of the National Park System: Lake Mead National Recreation Area (NV), Glen Canyon National Recreation Area (UT), and the Whiskeytown unit of the Whiskeytown-Shasta-Trinity National Recreation Area (CA).

Leasing and subsequent site-specific development can occur under Bureau of Land Management regulations at 43 CFR Parts 3100-3500 with the consent of the NPS, if the NPS determines that the leasing and subsequent development would not have a significant adverse impact on park resources and administration.

No federal mineral leasing has occurred in these park units for over four decades, nor has there been industry interest.

The Federal Coal Leasing Amendments Act of 1976, as amended (30 U.S.C. §201), and implementing regulations prohibit the issuance of federal leases for coal in any unit of the National Park System.

### ***Non-federally-Owned Minerals***

Approximately 100 parks contain other types of nonfederal minerals, such as sand, rock, and gravel. Whether or not these rights will ever be developed depends on a variety of factors such as the concentration and extent of the nonfederal mineral deposit, proximity, and available transportation to processing facilities and markets, and commodity price.

The NPS has not promulgated a specific regulation for these types of mineral activities. Instead, the NPS applies its “business operation” regulations at 36 CFR Parts 1 and 5. The Part 5 regulations require a special use permit for activities taking place in these areas, such as business operations, commercial vehicle access, and construction of roads, structures and other facilities. Special use permits contain terms and conditions that protect park resources and public safety.

Surface coal mining within any unit of the National Park System is prohibited by the Surface Mining Control and Reclamation Act of 1977 (SMCRA) subject to “valid existing rights.” No nonfederal coal mining currently exists in parks.

## **B. 9B REGULATIONS - 36 CFR PART 9, SUBPART B, GENERAL PROVISIONS AND NON-FEDERAL OIL AND GAS RIGHTS**

### **Legal And Emergency Authorities Available to Facilitate and Expedite Energy Production Actions**

The 36 CFR Part 9 Subpart B (9B) regulations allow for development of nonfederal oil and gas resources in national parks outside of Alaska\* while assuring that the public interest in preserving and protecting the natural and cultural resources of these areas is maintained. The 9B regulations were first promulgated in 1978 and revised in 2016. These regulations govern non-federal oil and gas rights within park boundaries. Approximately 2,600 oil and gas wells exist in at least 75 units of the National Park System. An estimated 340 of these wells are actively operating, while the remaining wells are inactive, plugged, abandoned, or orphaned. Currently, 12 park units have active operations.

Wells within the National Park System are associated with nonfederal (private and state held) oil and gas mineral rights that were established prior to creation of the park unit. There are no federally owned oil and gas leases within the National Park System. Abandoned and orphaned oil and gas wells that no longer have a viable operator are plugged and reclaimed dependent on availability of funds.

Under the 9B regulations, operators provide information regarding proposed operating methods and conditions. The NPS must complete an Initial Review of an Operator's Permit application within 30 days of receipt of the application to determine if all required information is included. As part of the permit review process, the NPS is required to comply with all applicable laws, including the National Environmental Policy Act, Endangered Species Act, and National Historic Preservation Act. Once these legal requirements have been met, the NPS must take Final Action on the operator's permit application within 30 days. The average time to reach Final Action can take from two months to one year depending on the scope and complexity of the proposed operation, the responsiveness of the operator in providing the required information, and the time it takes the NPS to comply with other applicable laws.

***Production from wells in the National Park System accounted for 0.004 percent of the total crude oil and 0.002 percent of the total natural gas produced in the United States in 2024.***

***The NPS has never denied an application for an operations permit.***

#### ***Cost-Benefit Analysis***

The 9B regulations do not impose a significant economic impact upon any operator conducting oil and gas activities in parks. The NPS' Cost-Benefit and Regulatory Flexibility Analysis (September 21, 2015) found that the cost of compliance was 0.03 percent of average annual receipts for such an operator.

#### ***Information Collection***

The NPS has one energy-related information collection under the Paperwork Reduction Act, 1024-0274, for information collection associated with 36 CFR part 9, subpart B, General Provisions and Non-Federal Oil and Gas Rights (covered under Section 7 of EO 13783). There are no forms associated with this information collection. Information collected is used to: evaluate proposed operations; ensure that all necessary mitigation measures are employed to protect park resources and values; and ensure compliance with all applicable laws and regulations. The NPS reviewed this information collection and found that it does not potentially burden development or use of domestically produced energy resources.

***\* Through the public comment process for the 2016 revisions to the 9B regulations, the NPS decided not to apply the 9B regulations to parks in Alaska. This exempts 54 million acres or approximately two-thirds of NPS lands from the regulations.***

### **C. ACQUISITION POLICY AND REGULATIONS**

The NPS does not have any restrictions in acquisition policy or regulations that would potentially burden development or use of domestically produced energy resources.

#### **D. GRANT PROGRAMS**

The NPS does not manage any grant programs that would potentially burden development or use of domestically produced energy resources.

#### **E. HYDROPOWER**

##### **Legal And Emergency Authorities Available to Facilitate and Expedite Energy Production Actions**

The NPS Hydropower Assistance Program (HAP) is a technical assistance program that provides assistance to national parks and partners engaged in the Federal Energy Regulatory Commission (FERC) licensing of non-federal hydropower projects. The NPS HAP works to ensure alignment with Secretary and Administration policies and principles. In FY24, the HAP supported 92 projects, 74 of which have an NPS park or program nexus. These projects generated nearly 15,000 MW of energy.

To advance energy production goals, the HAP:

- a. Provides technical assistance to hydropower operators, parks, and Tribes navigating the FERC process to facilitate energy production, assuring compatible outdoor recreation where appropriate, and protection of nationally designated park resources.
- b. Provides technical assistance to hydropower operators in identifying and developing the information that is needed for FERC to complete their reviews and ensure their applications are processed in a streamlined manner.
- c. Facilitates meetings with all parties to align shared interests and ensure mutually beneficial outcomes.
- d. Provides training, tools, and coordination to help parks, hydropower industry, and partners with the FERC process.

Applicants for FERC licenses consult with the NPS when a project has the potential to affect NPS-managed areas or resources. In accordance with the Federal Power Act, as amended, FERC regulations (18 CFR 4.38(a), 18 CFR 5.1(d), 18 CFR 16.8(a)) and (18 CFR 4.51(f)(5)) also direct hydropower license applicants to consult with the NPS on

recreation. The NPS authority to consult and provide technical assistance regarding recreational resources is in the Outdoor Recreation Act of 1963 (PL 88-29, 16 USC 4601-1(d)), Wild and Scenic Rivers Act (PL 90-542, as amended), the Organic Act (54 USC § 100101) and NPS site-specific enabling legislation.

FERC is charged with determining whether a proposed hydropower project is “best adapted” to a “comprehensive plan” and gives equal consideration for power and non-power resources in deciding whether to authorize a hydropower project. FERC regulations call for considering the ultimate development of recreation resources consistent with the needs of the area and consistency with the primary purpose of the project.

The FERC typically issues licenses for 30-50 years. Engaging in the process can be a once-in-a-generation opportunity to assist parties moving through the licensing process and development of reliable energy production with considerations of recreational, natural, and cultural resources.

## **F. NATIONAL HISTORIC PRESERVATION ACT**

### **Legal And Emergency Authorities Available to Facilitate and Expedite Energy Production Actions**

The National Historic Preservation Act (NHPA) was signed into law on October 15, 1966. It establishes a national preservation program and a system of procedural protections, which encourage both the identification and protection of historic resources, including archeological resources, at the federal level and indirectly at the state and local level. The National Historic Preservation Act (Pub. L. No. 89-665) was established at 16 U.S.C. §§470a-470w-6 et. seq. It was amended four times: 1976 (Pub. L. No. 94-422, 90 Stat. 1320), 1980 (Pub. L. No. 96-515, 94 Stat. 2987), 1992 (Pub. L. 102-575, 106 Stat. 4753), and 2016 (Pub. L. No. 96-515). In 2014, Public Law 13-287 moved the Act's provisions from Title 16 of the United States Code to 54 U.S.C. §300101, et seq., with minimal and non-substantive changes to the text of the Act and a re-ordering of some of its provisions.

NHPA established the Advisory Council on Historic Preservation (ACHP), an independent federal agency that advises the President and Congress on historic preservation matters. The Council and its staff also advise federal agencies on their roles in the national historic preservation program, especially their compliance with Section 106 of NHPA. Like all federal agencies, NPS is responsible for complying with the ACHP's Section 106 implementing regulations, which can be found at [36CFRPart800\\_as\\_amended2004\\_web.doc](#)).

Section 106 establishes a process for review of Federal undertakings and their effects on historic properties. The provision requires Federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve. More specifically, Section 106 requires Federal agency heads to take into account the effects of their proposed undertakings on historic properties (which are defined as properties eligible for listing or listed in the National Register of Historic Places) prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license. Section 106 also requires Federal agency heads to provide the ACHP a reasonable opportunity to comment. While it does not mandate preservation, Section 106 is related to other NHPA provisions designed to further national historic preservation policy goals.

### ***Emergency Procedures Under Section 106***

The Section 106 regulations (36 CFR 800.12) exempt immediate activities necessary to preserve life and property and provide for expedited review for other projects in the period immediately following a disaster declaration. In addition, Programmatic Agreements and other program alternatives can also provide expedited procedures for disaster response and recovery. All of NPS's program alternatives include provisions to address emergencies (see below).

### ***Termination***

If an undertaking will or may adversely affect historic properties (any prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places), the Section 106 regulations at 36 CFR § 800.6(b)(1)(i-iv) call for the federal agency to consult with the State and/or Tribal Historic Preservation Officer (SHPO, THPO) and other parties to negotiate and execute a Section 106 agreement document that sets out the measures the federal agency will implement to resolve those adverse effects. Section 106 agreements are legally binding and evidence an agency's completion of its Section 106 obligations.

In instances where the consulting parties cannot reach agreement, a required signatory may terminate consultation and request formal comments from the ACHP in conformance with the requirements set forth in 36 CFR § 800.7:

- Where the agency and the SHPO/THPO cannot agree on the terms of the agreement, the agency official shall request the ACHP to join the consultation and provide to the ACHP appropriate documentation as specified in 36 CFR § 800.11(g).
- If the ACHP decides to join the consultation, the agency shall proceed to consult further with the SHPO/THPO, ACHP, and any other consulting parties to reach agreement. If the ACHP elects not to join the consultation, it shall notify the agency and proceed to comment in accordance with 36 CFR § 800.7(c).

- Where the ACHP is already participating in the consultation and the agency terminates consultation, the head of the agency or the assistant secretary or other officer with major department-wide or agency-wide responsibilities shall request the ACHP comment and shall notify all consulting parties of this request.
- If the ACHP terminates consultation, the ACHP shall notify the agency official, the agency's Federal Preservation Officer (FPO), and all consulting parties and proceed to comment. The ACHP may consult with the agency's FPO prior to terminating consultation to seek to resolve issues concerning the undertaking and its effects on historic properties.

### ***Program Alternatives***

The ACHP's Section 106 regulations allow federal agencies to develop "program alternatives" that tailor the Section 106 review process to ensure its requirements are satisfied in a way that balances historic preservation concerns with other federal mission requirements and needs. Program alternatives can improve the effectiveness and efficiency of Section 106 reviews and streamline routine interactions while focusing effort on the more complex projects or historic properties most important to communities. NPS currently has three program alternatives:

- *Nationwide Programmatic Agreement with the ACHP and the National Conference of State Historic Preservation Officers (NCSHPO)* (November 14, 2008):
  - Provides parks with an efficient method to streamline the Section 106 process for 16 repetitive operational activities when certain conditions are met.
  - On average, approximately 70% of NPS undertakings utilize the streamlined review process allowable under the 2008 PA.
- *NPS Nationwide Programmatic Agreement of Cultural Resources Grants and Financial Assistance between NPS, ACHP, and NCSHPO* (September 6, 2024):
  - Facilitates the Section 106 process across multiple NPS financial assistance programs that support the preservation and interpretation of cultural resources, by establishing a consistent Section 106 review process and clarifying the timing of the Section 106 process within the Federal financial assistance process. Also provides programmatic allowances acknowledging the existing financial assistance requirements for many of these programs.
  - Execution of this Programmatic Agreement will greatly streamline compliance for all NPS cultural resource grants, including disaster supplemental funds.

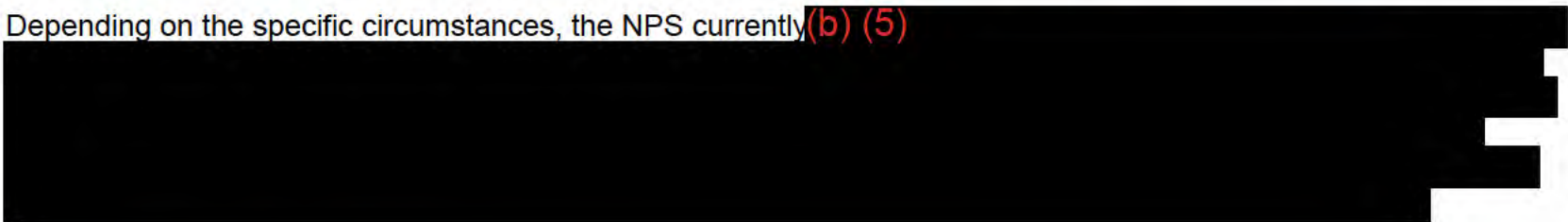


- *Program Comment on Stewardship and Management of Mission 66-era Facilities (1945-1972)* between NPS, ACHP, and NCSHPO (November 4, 2024):
  - Offers a new Section 106 “fast lane” for qualifying Mission 66-era projects meeting certain criteria.
  - The Program Comment can be used to satisfy Section 106 compliance for a number of undertakings not covered under the 2008 Nationwide Programmatic Agreement, including some that result in adverse effects.
  - There are nearly 20,000 Mission 66-era facilities including comfort stations, campgrounds, visitor centers, picnic shelters, staff housing, roads, and other infrastructure. Approximately 5,500 Mission 66-era facilities are categorized as being in “poor” or “serious” condition, and over the next five years, nearly 5,000 Mission 66-era facilities are slated for improvements, including improvement of employee housing, utilities, and accessibility.
  - Adoption of the Program Comment will greatly streamline compliance for Mission 66-era projects, ensuring timely obligation rates and successful project delivery.

## **G. NATIONAL ENVIRONMENTAL POLICY ACT**

### **Legal And Emergency Authorities Available to Facilitate and Expedite Energy Production Actions**

Depending on the specific circumstances, the NPS currently (b) (5)



#### **Emergency Action Procedures**

Under the DOI NEPA regulations, when there is an “active emergency,” the Responsible Official (RO) may “immediately take any necessary actions to mitigate harm to life, property, or important natural, cultural, or historic resources.” When doing so, the RO must consider “the probable environmental consequences of these actions and mitigate foreseeable adverse environmental effects to the extent practical.” If no additional actions are needed beyond the initial response, the RO documents in writing that an emergency existed and the type of response actions taken, and at that point no additional NEPA documentation is required.

If the “active emergency” has ended and there are additional actions that need to be taken (e.g., a fire is no longer burning but a park needs to take post-fire actions or to take action to minimize the threat of additional fires) a park should use a CE if applicable or initiate an EA or EIS to comply with NEPA for those actions. The NPS is also expected to comply with as many of the NEPA requirements as possible as part of their alternative arrangements (see CEQ’s *Emergencies and the National Environmental Policy Act Guidance, 2024*). In addition, typically agencies are expected to state how long alternative arrangements are in place for, and to complete a “normal” NEPA process at some point for actions that span a lengthy time-period. Therefore, when a park thinks it will need to take actions over the course of years, eventually an EA or EIS will need to be prepared absent Congressional direction to the contrary. NPS is currently in litigation over alternative arrangements that were meant to be in place for two to three years and for which no additional NEPA has been completed.

Alternative arrangements can usually be agreed upon with DOI in days, and with CEQ within a week or two. When seeking alternative arrangements, DOI and CEQ will ask about compliance with other laws such as the Endangered Species Act and National Historic Preservation Act. Those laws must be complied with as applicable, and each have their own emergency action provisions that could be invoked.

## **H. RIGHTS OF WAY**

### **Legal And Emergency Authorities Available to Facilitate and Expedite Energy Production Actions**

The NPS has streamlined and enhanced the Bureau’s Right-of-Way (ROW) program. Under the first Trump Administration, NPS released Reference Manual 53B (RM 53B) in January 2021. Following release of RM 53B, the NPS implemented new practices designed to provide clarity to both staff and applicants and remove impediments to the ROW permitting process. NPS continues to explore other streamlining efforts to support the administrative priority. This streamlining will enable, where applicable, greater consistency in the allowance of energy transmission infrastructure through NPS units.

Key actions undertaken since January 2021 include:

- Releasing updated ROW Regulations found at 36 CFR Part 14. These regulations were last updated as an Interim Rule in 1980, and they provide greater flexibility, update statutory references, and enhance consistency with other federal land management agency regulations. The NPS anticipates it will reduce the burden for applicants that have infrastructure crossing lands managed by multiple federal jurisdictions, such as the Greenlink West Project.

- Conducting annual ROW Program Reviews in accordance with an OIG Evaluation recommendation, which was successfully closed in 2022.
- Establishing dedicated ROW Coordinator positions in each region to support parks and permittees.
- Refining the program's data management system (Use Manager) to enhance accountability, track projects, and meet statutory broadband reporting requirements.

**Assistant Secretary for Fish and Wildlife and Parks Action Plan for  
SO 3417 – Addressing the National Energy Emergency, and  
SO 3418 – Unleashing American Energy**

Responsive to	SO 3417 – Addressing the National Energy Emergency, and SO 3418 – Unleashing American Energy				
Accountable	Assistant Secretary for Fish and Wildlife and Parks, National Park Service DOI Office of Environmental Policy and Compliance				
Initiative					
SO 3417 Section 4 (b): relevant authorities available to expedite completion of energy projects SO 3418 Section 3 (c): actions that prioritize reducing barriers to the use of Federal lands for energy development, consistent with the principle of multiple use					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Streamline NEPA procedures related to energy development	Section 109 of NEPA, enacted as part of the Fiscal Responsibility Act of 2023, 42 U.S.C. 4336c.	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					

(b) (5)

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**Assistant Secretary for Fish and Wildlife and Parks Action Plan for  
SO 3417 – Addressing the National Energy Emergency, and  
SO 3418 – Unleashing American Energy**

Responsive to	SO 3417 – Addressing the National Energy Emergency, and SO 3418 – Unleashing American Energy				
Accountable	Assistant Secretary for Fish and Wildlife and Parks, National Park Service DOI Office of Congressional and Legislative Affairs				
Initiative					
SO 3417 Section 4 (b): relevant authorities available to expedite completion of energy projects SO 3418 Section 3 (c): actions that prioritize reducing barriers to the use of Federal lands for energy development, consistent with the principle of multiple use					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Streamline Right-of Way Processes	Needed	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					



**Assistant Secretary for Fish and Wildlife and Parks Action Plan for  
SO 3417 – Addressing the National Energy Emergency, and  
SO 3418 – Unleashing American Energy**

Responsive to	SO 3417 – Addressing the National Energy Emergency, and SO 3418 – Unleashing American Energy				
Accountable	Assistant Secretary for Fish and Wildlife and Parks, National Park Service DOI Office of Congressional and Legislative Affairs				
Initiative					
SO 3417 Section 4 (b): relevant authorities available to expedite completion of energy projects SO 3418 Section 3 (c): actions that prioritize reducing barriers to the use of Federal lands for energy development, consistent with the principle of multiple use					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Streamline Right-of Way Processes		(b) (5)			

Milestones	Due Date	Measurable Metrics
(b) (5)		

**Assistant Secretary for Fish and Wildlife and Parks Action Plan for  
SO 3417 – Addressing the National Energy Emergency, and  
SO 3418 – Unleashing American Energy**

Responsive to	SO 3417 – Addressing the National Energy Emergency, and SO 3418 – Unleashing American Energy				
Accountable	National Park Service DOI Office of Congressional and Legislative Affairs				
Initiative					
SO 3418 Section 3 (c): actions that prioritize reducing barriers to the use of Federal lands for energy development, consistent with the principle of multiple use					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date

Infrastructure	P.L. 116-152	(b) (5)	
Milestones		Due Date	Measurable Metrics
(b) (5)			

## **Projects That Advance Energy Goals and Priorities**

In addition to the priorities identified above, various energy infrastructure projects have been completed, are underway and planned across NPS fund sources, including with key funding provided by the Great American Outdoors Act Legacy Restoration Fund, which is funded by non-appropriated revenue from energy development and royalties from offshore oil and natural gas leases. Nearly all energy infrastructure design and implementation work are carried out by private-sector contractors or utility companies while the federal government plays a key oversight and management role (currently key positions needed for implementation are frozen as well as private sector contracts to increase capacity). These energy infrastructure projects improve both the capacity and reliability of energy delivery to our parks - which in turn supports increasing visitation, economic activity, and infrastructure modernization that requires more capable and reliable power in these relative rural areas.

### ***Completed Projects***

Glacier Bay Park and Preserve - Alaska

\$6.5 million (Line-Item Construction)

This project constructed a 15 kilovolt, three phase electrical intertie with a communication link between the privately owned Falls Creek hydroelectric plant in Gustavus and the park's Bartlett Cove power generation plant. With this intertie, it is anticipated the local power company, Alaska Power & Telephone (AP&T), will provide 100 percent of the Park's power needs.

Yosemite National Park — California

Critical Repair and Replacement of 70KV Transmission Line from Parkline to Hwy 140 Powerhouse

\$11.8 million (Legacy Restoration Fund)

This project addressed critical failing electrical infrastructure including high voltage transmission lines that serve multiple areas. It replaced a transmission line and the supporting structures, originally constructed in the 1930s, and associated components.

Carlsbad Caverns National Park — New Mexico

Replace Failing Primary Electrical Distribution Infrastructure

\$11.6 million (Line-Item Construction)

This project replaced aged electrical infrastructure that is unreliable, unsafe, and undersized to meet industry standards. Primary service lines were buried to code-compliant depths to meet industry standards.

***Projects Underway – FY 2021 – FY 2031***

Predominantly through the initial authorization of Great America Outdoors Act Legacy Restoration Fund, NPS has investments underway to improve the reliability of our energy distribution systems, and where possible shepherd them into private utility operations and maintenance, reducing the NPS responsibilities.

Bandelier National Monument — New Mexico

Rehabilitate Underground Utilities

\$29.0 million (Legacy Restoration Fund)

This project is replacing the park's 60-year-old utility distribution and collection systems to address maintenance/repair work and code deficiencies. Work includes improving underground primary and secondary potable water distribution for required storage and fire flow; improving electrical and natural gas distribution for anticipated loads; and upgrading communication systems to meet current and future demands. An integrated utility corridor is being constructed under roads and existing conduit routes are being reused.

Catoctin Mountain Park — Maryland

Replace Parkwide Utility Infrastructure

\$22.3 million (Line-Item Construction)

This project is replacing park utility infrastructure including water, sanitary sewer, primary electrical, and communications system. Primary electric power distribution replacement includes transformers and primary feeders.

Chickasaw National Recreation Area — Oklahoma

Address Critical Repairs in the Platt and Buckhorn Developed Areas

\$38.6 million (Legacy Restoration Fund)

This project includes repair or replacement of water and wastewater systems, improvement and relocation of electrical infrastructure, replacement of lift stations, and rehabilitation of park comfort stations.

Gateway National Recreation Area — New York

Address Deferred Maintenance at Multiple Sites

\$40.0 million (Legacy Restoration Fund)

This project replaces electrical services, repairs or removes structures at multiple park locations. Work includes replacement of electrical service at Staten Island's Fort Wadsworth by replacing degraded, buried steel conduit. Features may include replacement of main switchgear; replacement of transformers; installation of underground conduit; installation of a central switchgear; and replacement of duct banks and wiring.

Gateway National Recreation Area — New Jersey & New York

Rehabilitate Deteriorated and Failing Mission-Critical Utility System Infrastructure – Phase I

\$34.2 million (Legacy Restoration Fund)

This project includes rehabilitation of critical water, wastewater, stormwater, and electrical utility systems at multiple park locations. Phase I includes repairing or replacing the infrastructure of the water, wastewater and storm water systems at Fort Wadsworth on Staten Island, as well as the underground relocation of electric power transmission lines, and ancillary equipment at Sandy Hook. Phase II addresses the electrical distribution system at Fort Tilden in Jamaica Bay.

Golden Gate National Recreation Area — California

Rehabilitate Unsafe and Inadequate Primary Electrical System at Fort Mason

\$20.1 million (Line-Item Construction)

This project is upgrading the existing park-owned 2,400-volt electrical distribution system serving Upper Fort Mason, to the Pacific Gas and Electric (PG&E) standard for a 12,000-volt system. The NPS intends to transfer the entire system to PG&E when the project is complete. The project replaces a substation, transformers, feeders, and main switchgear. Underground secondary service cables are being installed; other work replaces underground transformers, switches, and equipment at ground level locations.

Grand Canyon National Park — Arizona

Rehabilitate the North Rim and Roaring Springs Utility Systems

\$180.6 million (Legacy Restoration Fund)

This project addresses critical system deficiencies associated with the North Rim and Roaring Springs water, wastewater, electrical, and communication systems, along with their associated equipment, components, and support



structures. Critical and obsolete aspects of these utility systems are being replaced and rehabilitated to meet code requirements. These utility systems support visitor services and administrative operations.

Kalaupapa National Historical Park — Hawaii

Rehabilitate Unsafe and Failing Electrical System for Settlement

\$16.0 million (Legacy Restoration Fund)

This project is repairing the Settlement's single and three-phase electrical overhead distribution system to correct safety deficiencies and improve system reliability. Work includes upgrading the single-phase components to three phase power elements, replacing overhead power transformers and power poles, and adding new sections to establish a looped system allows for grid isolation and back-feed.

Mammoth Cave National Park — Kentucky

Repair and Replace Utility Infrastructure - Phase I

\$29.7 million (Legacy Restoration Fund)

This project is repairing and/or replacing multiple critical utility systems. Phase I work includes replacement of the cave's communications systems. The surface system components located outside the cave are also being rehabilitated including replacement of damaged fiber optics cables, electronic switching systems, and Wi-Fi equipment. Scheduled future Phase II work will rehabilitate water and sewer systems.

Rocky Mountain National Park — Colorado

Rehabilitate Headquarters East Water System and Moraine Park Campground Electrical Distribution

\$27.0 million (Legacy Restoration Fund)

This project is rehabilitating the Headquarters (HQ) East water system which includes the Moraine Park Campground water distribution systems and wastewater system. The project addresses sewer pipes, manholes, the well, water treatment system, and water tanks serving the campground, Beaver Meadows Visitor Center, HQ East, and High Drive. Most of the existing primary power supply was installed in 1965 and is well past the components' typical service life.

Saint-Gaudens National Historical Park — New Hampshire

Replace Electrical, HVAC, and Alarm Systems, and Rehabilitate Four Historic Structures

\$14.4 million (Legacy Restoration Fund)

This project is replacing mission critical fire and security systems, providing data connectivity to various facilities, updating electrical infrastructure, and replacing heating, ventilation, and air conditioning (HVAC) systems at multiple buildings of the park's Aspet unit.

Sleeping Bear Dunes National Lakeshore — Michigan

Rehabilitate Facilities on Manitou Islands

\$52.8 million (Legacy Restoration Fund)

This project is rehabilitating historic structures, utilities, and marinas on South and North Manitou Islands. Utility systems are being rehabilitated and obsolete systems replaced. This includes water, wastewater, fuel, and electrical power system components.

Voyageurs National Park — Minnesota

Replace Power Distribution Line Connecting Kettle Falls Hotel

\$13.9 million (Legacy Restoration Fund)

This project is replacing the main underwater high voltage cable and multiple transformer boxes that run from the mainland to the Kettle Falls district. Pad-mounted switchgear, sectionalizing enclosures, elbow terminations, as well as individual and other associated components are being replaced as needed. An improved level of emergency backup generation for critical loads at Kettle Falls Area is being installed.

***Projects Planned with Identified Funding – TBD***

The NPS has identified future year project lists for major construction funding as part of the regular planning process. The information below is currently embargoed as part of the budget process underway.



(b) (5)

***Proposed Investments with no funding identified***

These investments have been approved by the NPS Bureau Investment Review Board as sound investments in energy generation or distribution for national park units, however, funding has not been identified. Projects have been developed to varying degrees; cost estimates have not been fully verified and schedules for design through construction need refinement.

(b) (5)

(b) (5)

(b) (5)

***Contracts with Private Sector Energy and Utility Providers***

Another area of NPS investment in energy is contracting with private sector energy and utility providers for upgrades to improve energy reliability and/or electrical capacity. Here are examples of these types of projects:

(b) (5)



Assistant Secretary for Fish and Wildlife and Parks Action Plan for Secretarial Orders 3417 – 3422

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# Assistant Secretary for Fish and Wildlife and Parks Action Plan

## SO 3417—Addressing the National Energy Emergency

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	USFWS – Ecological Services				
Initiative (Section 4(b))					
Submit a plan that identifies all relevant emergency and other legal authorities available 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.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Improve energy and critical minerals identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation capacity of the United States to provide a reliable, diversified, growing, and affordable supply of energy for our Nation by	Endangered Species Act	(b) (5)			

making the fullest use of existing authorities, including emergency authorities.					
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Milestones	Due Date	Measurable Metrics			
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(b) (5)					
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# Assistant Secretary for Fish and Wildlife and Parks Action Plan

## SO 3418—Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	USFWS – Migratory Bird Program and Policy and Regulations Branch				
Initiative (Section 4.b. suspend, revise, or rescind documents including...)					
Migratory Bird Permits; Authorizing the Incidental Take of Migratory Birds					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Full bureau compliance with SO 3418	MBTA, APA, NEPA	(b) (5)			
Milestones	Due Date	Measurable Metrics			

(b) (5)



# Assistant Secretary for Fish and Wildlife and Parks Action Plan

## SO 3418—Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	USFWS – Migratory Bird Program and Policy and Regulations Branch				
Initiative (Section 4.b. suspend, revise, or rescind documents including...)					
Permanent Withdrawal of Solicitor Opinion M-37050 The Migratory Bird Treaty Act Does Not Prohibit Incidental Take, M-37065 and associated Regulations governing Take of Migratory Birds; Revocation of Provisions					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Full bureau compliance with SO 3418	MBTA, APA, NEPA	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					

Assistant Secretary for Fish and Wildlife and Parks Action Plan

SO 3418—Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	USFWS – NWRS Division of Realty				
Initiative (Section 4.c.)					
Identify existing, proposed, and planned administrative withdrawals from the mineral leasing laws relevant to NWRS lands.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Unleash American Energy by identifying and eliminating barriers to energy development	43 U.S.C. 1714	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					



(b) (5)

Assistant Secretary for Fish and Wildlife and Parks Action Plan

SO 3418—Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	USFWS – Ecological Services				
Initiative (Section 4(b))					
Submit an action plan to consider how to comply with the policy stated in Unleashing American Energy and steps that, as appropriate, will be taken to suspend, revise, or rescind the 3 ESA regulations finalized in 2024.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Remove impediments imposed on the development and use of our Nation's abundant energy and natural resources by the Biden administration's burdensome regulations.	Endangered Species Act	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					

(b) (5)

# Assistant Secretary for Fish and Wildlife and Parks Action Plan

## SO 3418—Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	USFWS – Ecological Services				
Initiative (Section 4(c))					
Submit an action plan to consider how to comply with the policy stated in Unleashing American Energy and review and, as appropriate, revise all relevant critical habitat designations promulgated by the U.S. Fish and Wildlife Service to ensure that such actions are based on the best scientific data available and that they take into consideration the economic impact and impact on national security, and in consideration of the Secretary's statutory authority to exclude areas as outlined in section 4(b )(2) of the Endangered Species Act.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Remove impediments imposed on the development and use of our Nation's abundant energy and natural resources by the Biden administration's burdensome regulations.	Endangered Species Act	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)

## Assistant Secretary for Fish and Wildlife and Parks Action Plan

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

<b>Responsive to</b>	SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
<b>Accountable</b>	USFWS –				
<b>Initiative</b>					
<b>Policy goal(s)</b>	<b>Legal Authority</b>	<b>Recommendation</b>	<b>Barriers to Overcome</b>	<b>Metrics for Success</b>	<b>Final Due Date</b>
<b>Milestones</b>	<b>Due Date</b>	<b>Measurable Metrics</b>			



## Assistant Secretary for Fish and Wildlife and Parks Action Plan

### SO 3420—Announcing President Trump's Revocation of Former Outer Continental Shelf Withdrawals

<b>Responsive to</b>	SO 3420 – Announcing President Trump's Revocation of Former Outer Continental Shelf Withdrawals				
<b>Accountable</b>	USFWS –				
<b>Initiative</b>					
<b>Policy goal(s)</b>	<b>Legal Authority</b>	<b>Recommendation</b>	<b>Barriers to Overcome</b>	<b>Metrics for Success</b>	<b>Final Due Date</b>
<b>Milestones</b>	<b>Due Date</b>	<b>Measurable Metrics</b>			

Assistant Secretary for Fish and Wildlife and Parks Action Plan  
SO 3421—Achieving Prosperity through Deregulation

Responsive to	SO 3421 – Achieving Prosperity through Deregulation				
Accountable	USFWS – NWRS Division of Natural Resources and Conservation Planning				
Initiative (Section 4)					
Review the hunting and fishing regulations for NWRS lands and identify potential regulations for elimination.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Achieving Prosperity through Deregulation	Pub. L. 105-57; 16 U.S.C. 460k-460k-4	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

**Assistant Secretary for Fish and Wildlife and Parks Action Plan**  
**SO 3422—Unleashing Alaska's Extraordinary Resource Potential**

Responsive to	SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential				
Accountable	USFWS – Region 7, Alaska				
Initiative (SO 3422 Section 6 (b) Action Plan)					
Facilitate the expedited development of a road corridor between the community of King Cove and the all-weather airport located in Cold Bay					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Section 3 (a): fully avail itself of Alaska’s vast lands and resources for the benefit of the Nation and the American citizens who call Alaska home.	NEPA, ANILCA Section 1302(h)	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)



# Assistant Secretary for Fish and Wildlife and Parks Action Plan

## SO 3422—Unleashing Alaska's Extraordinary Resource Potential

Responsive to		SO 3422 – Unleashing Alaska's Extraordinary Resource Potential			
Accountable		USFWS – Region 7, Alaska			
Initiative (SO 3422 Section 6 (b) Action Plan)					
Deny the pending request to the USFWS to an establish indigenous sacred site in the Coastal Plain of the Arctic National Wildlife Refuge					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Section 3 (a): fully avail itself of Alaska’s vast lands and resources for the benefit of the Nation and the American citizens who call Alaska home.	EO 14153 EO 13007	(b) (5)			

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

(b) (5)



## Assistant Secretary for Fish and Wildlife and Parks Action Plan

### SO 3422—Unleashing Alaska's Extraordinary Resource Potential

Responsive to	SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential				
Accountable	USFWS – Region 7, Alaska				
Initiative (SO 3422 Section 6 (c) Action Plan)					
Consider the Alaskan cultural significance of hunting and fishing and the statutory priority of subsistence management required by the ANILCA, to conduct meaningful consultation with the State fish and wildlife management agencies prior to enacting land management plans or other regulations that affect the ability of Alaskans to hunt and fish on public lands, and to ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Section 3 (a): fully avail itself of Alaska’s vast lands and resources for the benefit of the Nation and the American citizens who call Alaska home.	EO 14153	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)

## **Title:** Assistant Secretary Indian Affairs Action Plan for – Addressing the National Energy Emergency

**Summary:** The Assistant Secretary of Indian Affairs will fulfill Indian Trust responsibilities by reducing barriers for energy production. Indian owners (Tribes and individual Indian owners) are the primary owners on Indian trust and restricted lands and hold decision-making authority to develop energy and minerals. Leases and agreements for oil & gas, critical minerals, coal, and other energy and mineral resources are entered into by the Indian owners (lessor) and the company (lessee) while the Department approves leases,<sup>1</sup> agreements, permitting and rights-of-way. The Department's role in development includes engaging with Indian owners to make resources available to expedite energy and mineral development.

SO 3417, "...implements provisions of President Trump's January 20, 2025, Executive Order (EO) 14156, titled "Declaring a National Energy Emergency," and will improve the energy and critical minerals identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation capacity of the United States to provide a reliable, diversified, growing, and affordable supply of energy for our Nation by making the fullest use of existing authorities, including emergency authorities."

Directive 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.

Directive 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.

*Each such Bureau and Office will develop a plan for use of these authorities for the described purposes and submit those plans to the Secretary within 15 days.*

### **Top priorities:**

(b) (5)

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<sup>1</sup> Except for Five Tribes members' mineral leases.

(b) (5)

3.

(b) (5)

**Additional Information:**

Emergency and Other Legal Authorities

- Act of March 3, 1909, 25 U.S.C. § 396 – implementing regulations found at 25 C.F.R. Part 212; provides authority to lease allotted Indian minerals.
- Indian Mineral Leasing Act of 1938, 25 U.S.C. 396a-g – implementing regulations found at 25 C.F.R. Part 211 - Leasing of Tribal lands for Mineral Development

- Indian Mineral Development Act of 1982, 25 U.S.C. §§ 2101-2108 – implementing regulations found at 25 CFR Part 225; leasing of fluid and solid minerals on Tribal trust land with approval by the BIA, including oil & gas, critical minerals, and coal. Also provides for Indian owner to receive from the Department assistance and resources in negotiating a minerals agreement.
- Energy Policy Act of 2005, as amended, 25 U.S.C. §§ 3501-3504 - provides for the Department to provide technical assistance and grant funding to support tribal efforts to develop energy and mineral resources and related capacity; development of Tribal Energy Resource Agreements (TERAs) and Tribal Energy Development Organization (TEDOs) once approved, offers a voluntary, Tribe or a Tribally owned entity to enter into energy related leases, rights-of-way, and business agreements without Department approval.
- Fort Berthold Allotment Act, 25 U.S.C. § 396 (note), as amended – authorizes approval of mineral leases and agreements that affect individually owned land located within the Fort Berthold Indian Reservation and certain former Oklahoma reservations upon consent of majority interest and best interest determination (advertised lease sale not required).
- Indian Self-Determination and Education Assistance Act, 25 U.S.C. § 5301 et seq. – allows Tribes to enter into self-determination contracts with the Department to assume administration of non-inherently Federal functions for energy and/or mineral development.
- The Snyder Act of 1921, 25 U.S.C. § 13 – authorizes Indian Affairs to operate programs for the benefit and assistance of Indians, which may provide additional general authority for energy and mineral activities, pending the availability of funding resources.
- The Helping Expedite and Advance Responsible Tribal Home Ownership Act of 2012 (HEARTH Act) once approved, offers a voluntary, more efficient land-leasing process for Tribes by amending the Indian Long-Term Leasing Act of 1955, 25 U.S.C. § 415.
- Indian Right-of-Way Act of 1948, 25 U.S.C. §§ 323-328 - implementing regulations found at 25 C.F.R. Part 169.
- 25 U.S.C. § 385c – implementing regulations found at 25 C.F.R. 175; provides for the administration of electric utilities which are owned and operated by BIA.
- Osage Allotment Act, Section 3 of the Act of June 28, 1906, 34 Stat. 539 – implementing regulations found at 25 C.F.R. Part 226; provides for competitive, advertised oil and gas lease sales of the Osage Mineral Estate and provides that the United States may purchase oil from any lease at not less than the highest posted price.
- 25 C.F.R. 213.17 (Certain Five Tribes Allotted Leases) - provides the United States, during times of war or other public emergency, the option to purchase all or any part of the minerals produced under any lease approved under this Part at the prevailing market price on the date of sale.
- 25 C.F.R. 227.14 (Certain Wind River Tribal Lands) provides the United States, during times of war or other public emergency, the option to purchase all or any part of the oil or gas produced under any lease at the posted market price, however, the Tribe uses the IMDA, not this Part, for its oil and gas leasing, thus, there is no oil and gas to which this currently applies.



## Assistant Secretary Indian Affairs Action Plan for SO 3417 – Addressing the National Energy Emergency

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	OBPM, DAS-M, OEM, OIED, OTS/NR/IESC/DRES/DEMD				
Initiative					
<p><u>Directive A:</u> 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.</p> <p><u>Directive B:</u> 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> <p><i>Each such Bureau and Office will develop a plan for use of these authorities for the described purposes and submit those plans to the Secretary within 15 days.</i></p>					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
(b) (5)					



(b) (5)

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(b) (5)

(b) (5)

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Milestones	Due Date	Measurable Metrics
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(b) (5)		
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## **Title:** Assistant Secretary Indian Affairs Action Plan for SO 3418 – Unleashing American Energy

**Summary:** 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. By removing such regulations, America's natural resources can be unleashed to restore American prosperity. Our focus must be on advancing innovation to improve energy and critical minerals identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation capacity of the United States to provide a reliable, diversified, growing, and affordable supply of energy for our Nation.

*All Assistant Secretaries are hereby directed to promptly review all agency actions and submit an action plan to me in 15 days to consider how to comply with the policy in section 3.*

### **Top priorities:**

1. Ensure that all revoked EOs are terminated, including contracts or agreements fulfilling the same. Justification: Initial plan will ensure that each identified EOs are meaningfully terminated.

IA is tracking all newly issued EOs by this Administration and as well as recently rescinded EOs issued by the prior administration. For all known instances, rescinded EO references from the prior administration have been removed from IA's Directives System.

2. Suspend, revise, or rescind SOs, IMs, and DMs Justification: Initial plan will ensure that each identified SOs, IMs, and DMs, are meaningfully reevaluated.

IA is tracking all newly issued SOs by this Administration and as well as recently rescinded SOs issued by the prior administration. For all known instances, rescinded SOs references from the prior administration have been removed from IA's Directives System and applicable DMs. IA's Directives System consists of Indian Affairs Manuals chapters, Regional Directives, Handbooks, Assistant Secretary's Orders, National Policy Memoranda, and Regional Policy Memoranda. IA will continue to track these directives and work with bureaus/programs/offices to ensure these documents are updated appropriately.

### **Additional Information:**

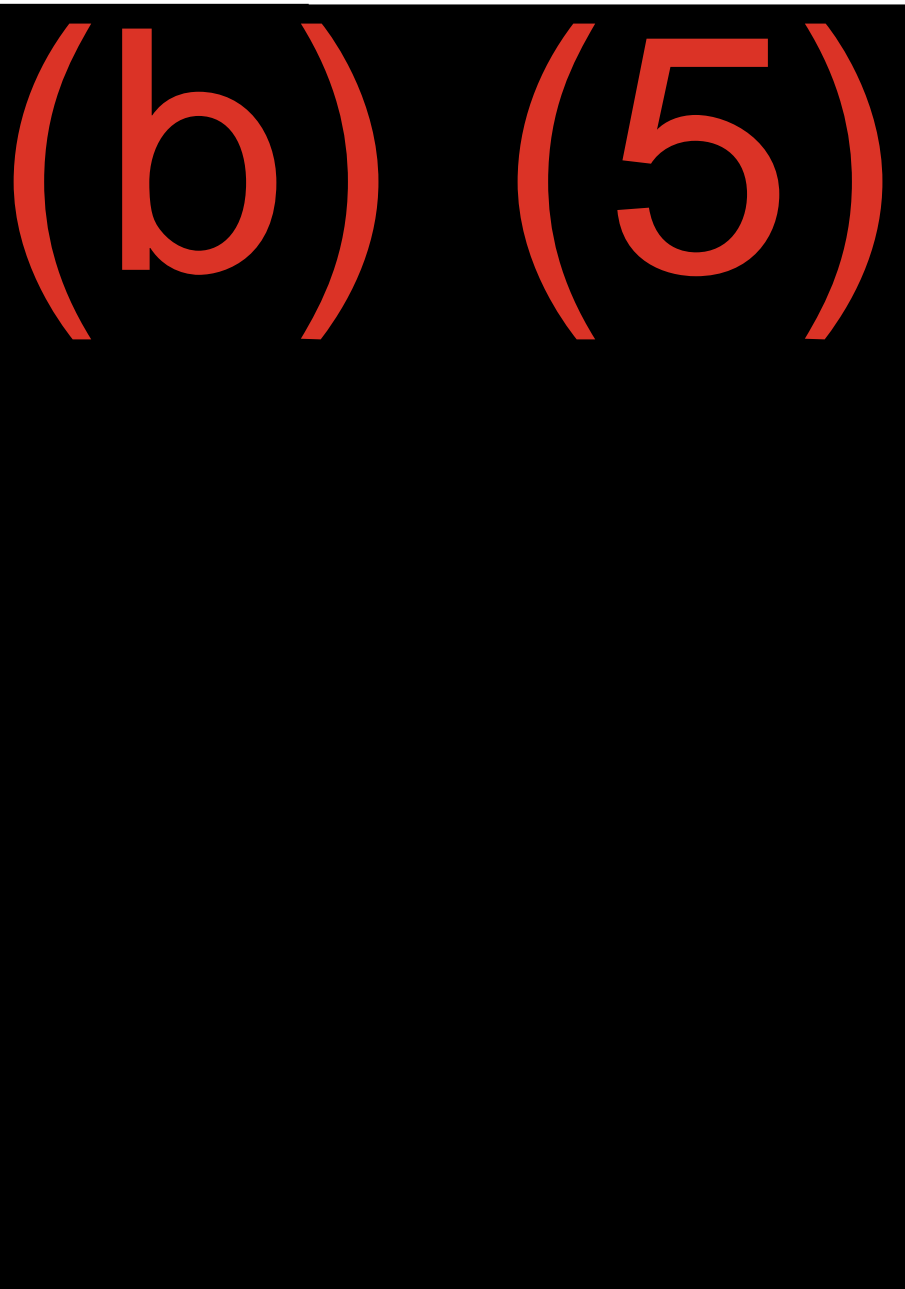
Generally, a reference in the IA Directives System to an EO or DM is typically used as a reference in terms of how it guides IA's work under a broad "authority." IA bureaus/programs/offices will continue to review all Directives to ensure they align with the policy goals and objectives of the new administration and revise as necessary. In some cases, IA bureaus/programs/offices will need to update directives' content to address more than just the removal of revoked EOs or SOs, to streamline processes to maximize efficiency due to potential changes to energy priorities and other actions. IA will continue to track these directives and work with bureaus/programs/offices to ensure these documents are updated appropriately.

## Assistant Secretary Indian Affairs Action Plan for SO 3418 – Unleashing American Energy

Responsive to	Assistant Secretary Indian Affairs Action Plan for SO 3418 – Unleashing American Energy				
Accountable	OBPM, DAS-M, RACA, OIED, OTS				
Initiative					
All Assistant Secretaries are hereby directed to promptly review all agency actions and submit an action plan to me in 15 days to consider how to comply with the policy in section 3. (Section 4a-c. Submit list all actions taken to implement the revoked EOs (4a), and an action plan to recommend steps to either suspend, revise, or rescind each listed document appropriate for your corresponding bureaus and offices (4b-c).					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
<u>Directive A. Terminate:</u> EO 14057 of December 8, 2021, titled "Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability"	N/A	(b) (5)			
<u>Directive B. Suspend, revise, or rescind:</u> In conjunction with the emergency actions outlined above in response to SO 3417 and the Alaska specific actions in SO 3422 below, review and revise all Energy, Mineral, and Fluid Mineral development policies and regulations to align IA processes and approvals with the policies and priorities of this Administration.	All underlying statutory authorities allowing/supporting agency action and applicable agency discretion.				



	As it conducts further review and planning, IA will identify these with more specificity.
<p><u>Directive B, Suspend, revise, or rescind:</u></p> <p>Review and revise NEPA policies and regulations to increase the speed of permitting approvals as it relates to the policies and priorities of this Administration.</p>	<p>All underlying statutory authorities allowing/supporting agency action and applicable agency discretion. As it conducts further review and planning, IA will identify these with</p>



	more specificity.	(b) (5)
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Milestones	Due Date	Measurable Metrics
(b) (5)		

(b) (5)

## **Title:** Assistant Secretary Indian Affairs Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

**Summary:** This Order implements 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) by ensuring that the Department of the Interior (Department) promptly identifies appropriate actions to cut red tape that will reduce costs for Americans. 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.

*Each such Bureau and Office will develop a plan for use of these authorities for the described purposes and submit those plans to the Secretary within 15 days.*

### **Top priorities:**

1. Conduct a review of programs and regulations to identify those that may result in higher costs for the American people. Specifically, housing, healthcare, home and appliances, climate policies that increase the cost of food or energy. Justification: Initial plan will ensure engagement across all IA programs. Reevaluate every quarter to ensure accuracy, applicability, and compliance.

2.

3.



(b) (5)

(b) (5)



(b) (5)

(b) (5)

(b) (5)

**Additional Information:**

43 IAM 2: Energy and Mineral Development

48 IAM 1: Indian Energy Service Center (Overview)

Part 50: Irrigation & Power — these 2 chapters have to do with irrigation and electric power utilities

Part 52: Real Estate Services-- possibly several (ROW, etc.)

80 IAM 6: Energy Conservation and Energy Management Program

59 IAM 3: NEPA

## Assistant Secretary Indian Affairs Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

Responsive to	Assistant Secretary Indian Affairs Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
Accountable	OBPM, DAS-M, and all IA programs				
Initiative					
Review all Departmental and bureau policies to identify those that may result in higher costs for the American people.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Goal 1, AS-IA/DAS-M will establish a coordination group to reduce inflationary impacts as noted under Priority 1	N/A	(b) (5)			
Goal 2: Immediate relief, Waivers	5 U.S.C. 301; 18 U.S.C. 437; 25 U.S.C. 2, 9, 261, 262, 264; sec. 5, 19 Stat. 200, sec. 1, 31 Stat. 1066, as amended; and sec. 701, Pub. L. 114-74, 129 Stat. 599,				

	unless otherwise noted.				
Goal 3 Increased Relief, Building Capacity in Systems and Programs	TBD	(b) (5)			
Goal 4 Contractual reforms (Near-term): Create employment opportunities for American workers, including drawing discouraged workers into the labor force	TBD				
Goal 5 Infrastructure assessments and investments	TBD				

Milestones	Due Date	Measurable Metrics
(b) (5)		



**Title:** Assistant Secretary Indian Affairs Action Plan for SO 3422 - Unleashing Alaska's Extraordinary Resource Potential

**Summary:** This Order implements provisions of President Trump's January 20, 2025, Executive Order (EO) 14153, titled "Unleashing Alaska's Extraordinary Resource Potential," which directs the Secretary of the Interior to exercise all lawful authority and discretion available and take all necessary steps to unleash the State of Alaska's abundant and largely untapped supply of natural resources.

Directive A: *Within 15 days of the issuance of this Order*, the Assistant Secretary -Land and Minerals Management, in coordination with other Assistant Secretaries, will submit an action plan to me describing the necessary and appropriate steps to execute the direction regarding all agency actions in section 3(a)(i)-(ii) and section 3(b)(ii)-(x), (xii)-(xiv), (xv-xviii), (xxi), and (xxiii) of EO 14153. This plan will include steps to expedite the permitting and leasing of energy and natural resource projects in Alaska (including the rights-of-way and easements for roads that enable this development to occur).

Directive B: Does not apply to IA.

Directive C: *Within 15 days of the issuance of this Order*, the Assistant Secretary-Policy, Management and Budget, in coordination with all Bureau and Office Heads, will submit an action plan to me to immediately take the appropriate steps to execute the direction with respect to the agency actions in section 3(b)(xxii) of EO 14153.

**Top priorities:**

(b) (5)

**Additional Information:**

(b) (5)

(b) (5)

## Assistant Secretary Indian Affairs Action Plan for SO 3422 - Unleashing Alaska's Extraordinary Resource Potential

Responsive to	Assistant Secretary Indian Affairs Action Plan for SO 3422 - Unleashing Alaska's Extraordinary Resource Potential				
Accountable	OBPM, DAS-M, RACA, IESC, OTS/DRES/DEMD				
Initiative					
Unleashing Alaska's Natural Resource Potential					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Section 3(a)(i) rescind, revoke, revise, amend, defer, or grant exemptions from 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 this order, including but not limited to agency actions promulgated, issued, or adopted between January 20, 2021, and January 20, 2025;	EO 14153	(b) (5)			
Section 3(a) (ii) prioritize the development of Alaska's LNG potential, including the permitting of all necessary pipeline and export infrastructure related to the Alaska LNG Project, giving due consideration to the economic and national security benefits associated with such development.					
Section 3(a) (ii) (b) In addition to the actions outlined in subsection (a) of this section, the Secretary of the Interior shall exercise all lawful authority and discretion available to him and take all necessary steps to:					
(ii) rescind the cancellation of any leases within the Arctic National Wildlife Refuge, other than such lease cancellations as the Secretary of the Interior determines are consistent with the policy interests					

described in section 2 of this order, initiate additional leasing through the Coastal Plain Oil and Gas Leasing Program, and issue all permits, right-of-way permits, and easements necessary for the exploration, development, and production of oil and gas from leases within the Arctic National Wildlife Refuge;		(b) (5)
(iv) place a temporary moratorium on all activities and privileges granted to any party pursuant to the record of decision signed on December 8, 2024, entitled “Coastal Plain Oil and Gas Leasing Program Record of Decision,” which is referred to in “Notice of Availability of the Record of Decision for the Final Supplemental Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program, Alaska,” 89 <i>Fed. Reg.</i> 101042 (December 13, 2024), in order to review such record of decision in light of alleged legal deficiencies and for consideration of relevant public interests, and, as appropriate, conduct a new, comprehensive analysis of such deficiencies, interests, and environmental impacts;		
(vii) evaluate changes to, including the potential rescission of, Public Land Order 5150, signed by the Assistant Secretary of the Interior on December 28, 1971, and any subsequent amendments, modifications, or corrections to it;		
(viii) place a temporary moratorium on all activities and privileges granted to any party pursuant to the record of decision signed on June 27, 2024, entitled “Ambler Road Supplemental Environmental Impact Statement Record of Decision,” which is referred to in “Notice of Availability of the Ambler Road Final Supplemental		

Environmental Impact Statement, Alaska,” 89 <i>Fed. Reg.</i> 32458 (April 26, 2024), in order to review such record of decision in light of alleged legal deficiencies and for consideration of relevant public interests and, as appropriate, conduct a new, comprehensive analysis of such deficiencies, interests, and environmental impacts; and reinstate the record of decision signed on July 23, 2020, by the Bureau of Land Management and United States Army Corps of Engineers entitled “Ambler Road Environmental Impact Statement Joint Record of Decision,” which is referred to in “Notice of Availability of the Record of Decision for the Ambler Mining District Industrial Access Road Environmental Impact Statement,” 85 <i>Fed. Reg.</i> 45440 (July 28, 2020);	
(xi) facilitate the expedited development of a road corridor between the community of King Cove and the all-weather airport located in Cold Bay;	
(xii) place a temporary moratorium on all activities and privileges granted to any party pursuant to the record of decision signed on April 25, 2022, entitled “National Petroleum Reserve in Alaska Integrated Activity Plan Record of Decision,” (NEPA No. DOI-BLM-AK-R000-2019-0001- EIS), in order to review such record of decision in light of alleged legal deficiencies and for consideration of relevant public interests and, as appropriate, conduct a new, comprehensive analysis of such deficiencies, interests, and environmental impacts;	
(xvi) immediately review all Department of the Interior guidance regarding the taking of Alaska Native lands	ANCSA

(b) (5)

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.

(xxi) immediately conduct a review of waterways in the State of Alaska and direct the Bureau of Land Management, in consultation with the State of Alaska, to provide recommendations of navigable waterways subject to the equal footing doctrine and the Submerged Lands Act of 1953, as amended, 43 U.S.C. 1301 *et seq.*, and prepare Recordable Disclaimers of Interest pursuant to section 315 of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1745, to restore ownership of said waterways to the State as appropriate;

(b) (5)



(xxii) direct all bureaus of the Department of the Interior to consider the Alaskan cultural significance of hunting and fishing and the statutory priority of subsistence management required by the ANILCA, to conduct meaningful consultation with the State fish and wildlife management agencies prior to enacting land management plans or other regulations that affect the ability of Alaskans to hunt and fish on public lands, and to ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands;		(b) (5)			
(xxiii) identify and assess, in collaboration with the Secretary of Defense, the authorities and public and private resources necessary to immediately achieve the development and export of energy resources from Alaska—including but not limited to the long-term viability of the Trans-Alaska Pipeline System and the associated Federal right-of-way as an energy corridor of critical national importance—to advance the Nation’s domestic and regional energy dominance, and submit that assessment to the President.					

Milestones	Due Date	Measurable Metrics
(b) (5)		

**Title:** Assistant Secretary – Insular and International Affairs

Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

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

(b) (5)

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

(b) (5)

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

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

Responsive to	<a href="#">SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential</a>				
Accountable	Office of Insular Affairs				
Initiative					
Sec. 6. Identify necessary and appropriate steps to execute the direction regarding all agency actions in EO 14153.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
N/A	N/A (OIA does not have any authorities or programmatic jurisdiction for Alaska)	N/A	N/A	N/A	N/A
Milestones		Due Date	Measurable Metrics		
State Action That Needs to Be Taken		List Target Due Date for Action	Define metrics that will measure success for each action being taken by each due date.		

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

Responsive to	SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential				
Accountable	Office of International Affairs				
Initiative					
Sec. 6. Identify necessary and appropriate steps to execute the direction regarding all agency actions in EO 14153.					
Policy Goals	Legal Authority	Recommendation	Metrics for Success	Barriers to Overcome	Final Due Date
Coordinating potential international cooperation on energy development in Alaska.	22 USC Sec 2392(b), 2451-2460	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					



Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

Responsive to	SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential				
Accountable	Ocean, Great Lakes, and Coastal Program				
Initiative					
Sec. 6. Identify necessary and appropriate steps to execute the direction regarding all agency actions in EO 14153.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Fully availing itself of Alaska’s vast resources for the benefit of the Nation	The Outer Continental Shelf Lands Act as amended in 1978 (43 USC 1344)  1982 U.N. Convention on the Law of the Sea, Article 76	(b) (5)			

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

Milestones	Due Date	Measurable Metrics
(b) (5)		

**Title:** Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

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

(b) (5)



Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

(b) (5)

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

(b) (5)

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Office of Insular Affairs				
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 in section 3.					
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) – see bulleted list.					
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 – see bulleted list.					
Sec. 4.d. In addition to the review described in subparagraph (a), (b), and (c) above, the Assistant Secretary -Policy, Management and Budget is hereby directed to include in their action plan a review that includes, but is not limited to, their processes, policies, and programs for issuing grants, loans, contracts, or any other financial disbursements of all appropriated funds from the Inflation Reduction Act of 2022 (Public Law 117-169) and the Infrastructure Investment and Jobs Act (Public Law 117-58) for consistency with the policy in section 3.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Encouraging energy exploration and critical mineral identification on the Outer Continental Shelf surrounding the territories	48 USC 1492  48 USC 1469(d)  43 USC 1457	(b) (5)			

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

Ensuring reliable energy is readily available in the territories	48 USC 1492  48 USC 1469(d)	(b) (5)		
Milestones	Due Date	Measurable Metrics		
(b) (5)				

(b) (5)

(b) (5)



Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Office of International Affairs				
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 in section 3.					
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) – see bulleted list.					
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 – see bulleted list.					
Sec. 4.d. In addition to the review described in subparagraph (a), (b), and (c) above, the Assistant Secretary -Policy, Management and Budget is hereby directed to include in their action plan a review that includes, but is not limited to, their processes, policies, and programs for issuing grants, loans, contracts, or any other financial disbursements of all appropriated funds from the Inflation Reduction Act of 2022 (Public Law 117-169) and the Infrastructure Investment and Jobs Act (Public Law 117-58) for consistency with the policy in section 3.					
Policy goal(s)	Legal Authority	Recommendation	Metrics for Success	Barriers to Overcome	
Align trade agreement practices with energy policies.	15 CFR 2002.2  42 USC Sec 4332	<div>(b)(5)</div>			
Support access to overseas markets for	Section 632(b) of Foreign				

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

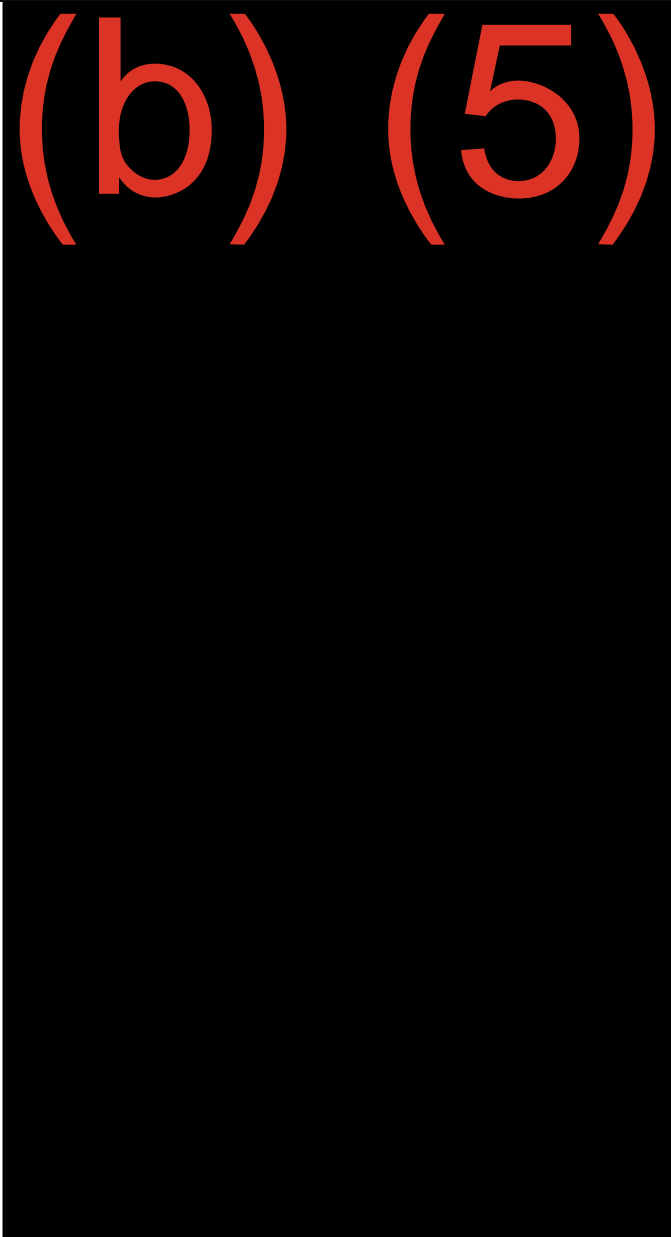
American energy resources.	Assistance Act of 1961  22 USC Sec 2392(b)  22 U.S. Code Chapter 105 (Global Fragility Act); in certain countries.	(b) (5)	
Milestones	Due Date	Measurable Metrics	
(b) (5)			



Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Ocean, Great Lakes, and Coastal Program				
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 in section 3.					
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) – see bulleted list.					
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 – see bulleted list.					
Sec. 4.d. In addition to the review described in subparagraph (a), (b), and (c) above, the Assistant Secretary -Policy, Management and Budget is hereby directed to include in their action plan a review that includes, but is not limited to, their processes, policies, and programs for issuing grants, loans, contracts, or any other financial disbursements of all appropriated funds from the Inflation Reduction Act of 2022 (Public Law 117-169) and the Infrastructure Investment and Jobs Act (Public Law 117-58) for consistency with the policy in section 3.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Encourage energy exploration and production  Establish the U.S. as a leading producer and processor of nonfuel minerals, including rare earth minerals	Title X, Subtitle E, Section 1055 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (P.L. 116-283  Title CIII, National Ocean	(b) (5)			

Assistant Secretary – Insular and International Affairs  
 Action Plan for SO 3418 – Unleashing American Energy

Ensure an abundant supply of reliable energy is readily available in every state and territory of the United States	Exploration, of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (P.L. 117-263)			
Ensure all regulatory requirements related to energy are grounded in clearly applicable law	The Outer Continental Shelf Lands Act as amended in 1978 (43 USC 1344)			
Guaranteeing that all executive departments and agencies provide opportunities for public comment and rigorous, peer-reviewed scientific analysis	National Environmental Policy Act of 1969 (42 U.S.C 4321 et. seq.)			
	Marine Mammal Protection Act of 1972 (16 U.S.C. 31)			

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

<p>Prioritize reducing barriers to use OCS for energy development</p> <p>Work within the Department and OCS to review all relevant internal regulations, policies, and guidance to ensure lawful implementation of NHPA section 106</p> <p>Review and revise as appropriate, all undue burdens on the domestic mining and processing of OCS nonfuel minerals</p>	<p>National Historic Preservation Act of 1966 (16 USC 470 et. seq)</p> <p>Endangered Species Act (16 USC 1531 et. seq)</p> <p>1982 U.N. Convention on the Law of the Sea, Article 76</p>	(b) (5)			
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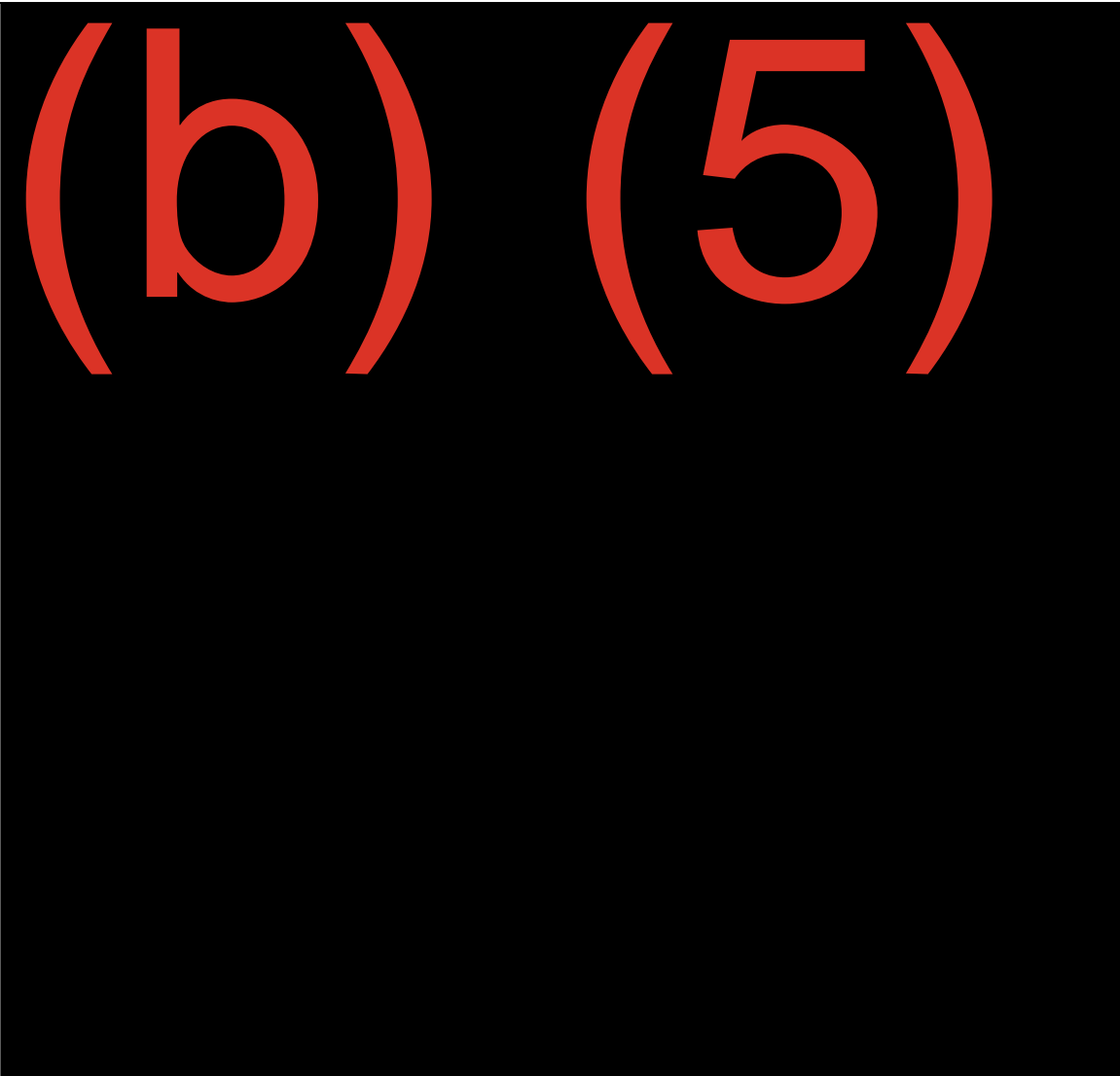
Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

Prioritize efforts to accelerate the ongoing, detailed geologic mapping of the United States, with a focus on locating previously unknown deposits of critical minerals		(b) (5)			
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Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

		(b) (5)			
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Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

			
Prioritize reducing barriers to use OCS for energy development	1982 U.N. Convention on the Law of the Sea, Article 76		

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3418 – Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		



(b) (5)

**Title:** Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

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

(b) (5)

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

(b) (5)

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

(b) (5)

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

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Office of Insular Affairs				
Initiative					
Sec. 2.a. All Bureaus and Offices 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.					
Sec.2.b. All 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.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Expedite completion of energy and infrastructure grant projects	Section 109 of National Environmental Policy Act 42 U.S.C. § 4336c	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Office of International Affairs				
Initiative					
Sec. 2.a. All Bureaus and Offices 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.					
Sec.2.b. All 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.					
Policy goal(s)	Legal Authority	Recommendation	Metrics for Success	Barriers to Overcome	Final Due Date
(b) (5)					

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

(b) (5)

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

Milestones	Due Date	Measurable Metrics
(b)	(5)	



Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Ocean, Great Lakes, and Coastal Program				
Initiative					
Sec. 2.a. All Bureaus and Offices 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.					
Sec.2.b. All 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.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Streamline permitting  Critical Mineral Development on the OCS	Title X, Subtitle E, Section 1055 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (P.L. 116-283  Title CIII, National Ocean Exploration, of the James M. Inhofe National Defense Authorization Act for Fiscal	(b) (5)			

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

	<p>Year 2023 (P.L. 117-263)</p> <p>The Outer Continental Shelf Lands Act as amended in 1978 (43 USC 1344)</p> <p>National Environmental Policy Act of 1069 (42 U.S.C 4321 et. seq.)</p> <p>Marine Mammal Protection Act of 1972 (16 U.S.C. 31)</p> <p>National Historic Preservation Act of 1966 (16 USC 470 et. seq)</p> <p>Endangered Species Act (16</p>	(b) (5)			
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Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

	USC 1531 et. seq) 1982 U.N. Convention on the Law of the Sea, Article 76	(b) (5)			
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Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

		(b) (5)			
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Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

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

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3417 – Addressing the National Energy Emergency

(b) (5)

**Title:** Assistant Secretary – Insular and International Affairs

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.

(b) (5)



Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

(b) (5)

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

(b) (5)

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

Assistant Secretary – Insular and International Affairs  
 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 Insular Affairs				
Initiative					
Sec. 5.b. The heads of Bureaus and Offices are responsible for conducting the review required in section 4 and reporting the results. They will also be responsible for ensuring completion of any implementation actions, including modifications to Bureaus and Offices policies, procedures, or practices that are inconsistent with the goals of the Cost-of-Living Memo. See Presidential Memo of January 20, 2025.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Establish a baseline of cost of living and labor market data in the territories	48 USC 1469(d)  Evidence Act	(b) (5)			
Evaluate and support reduction of impediments (red tape) to mitigate adverse effects on cost of living,					

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

workforce, and economic development		(b) (5)	
Milestones	Due Date	Measurable Metrics	
(b) (5)			

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

(b) (5)		
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Assistant Secretary – Insular and International Affairs  
 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 International Affairs				
Initiative					
Sec. 5.b. The heads of Bureaus and Offices are responsible for conducting the review required in section 4 and reporting the results. They will also be responsible for ensuring completion of any implementation actions, including modifications to Bureaus and Offices policies, procedures, or practices that are inconsistent with the goals of the Cost-of-Living Memo. See Presidential Memo of January 20, 2025.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Increase foreign supply of critical minerals to accelerate technological advancement and lower input costs.	Section 632(b) of Foreign Assistance Act of 1961  22 USC Sec 2392(b)	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

(b) (5)



Assistant Secretary – Insular and International Affairs  
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	Ocean, Great Lakes, and Coastal Program				
Initiative					
Sec. 5.b. The heads of Bureaus and Offices are responsible for conducting the review required in section 4 and reporting the results. They will also be responsible for ensuring completion of any implementation actions, including modifications to Bureaus and Offices policies, procedures, or practices that are inconsistent with the goals of the Cost-of-Living Memo. See Presidential Memo of January 20, 2025.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Lower costs by leveraging AI to Accelerate Ocean Exploration, permitting, and development of Energy and Critical Minerals	Title X, Subtitle E, Section 1055 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (P.L. 116-283	(b) (5)			
Coordinated Approach for Critical Mineral Development on the OCS	Title CIII, National Ocean Exploration, of the James M. Inhofe National Defense Authorization Act for Fiscal				



Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

	<p>Year 2023 (P.L. 117-263)</p> <p>The Outer Continental Shelf Lands Act as amended in 1978 (43 USC 1344)</p> <p>National Environmental Policy Act of 1069 (42 U.S.C 4321 et. seq.)</p> <p>Marine Mammal Protection Act of 1972 (16 U.S.C. 31)</p> <p>National Historic Preservation Act of 1966 (16 USC 470 et. seq)</p>	(b) (5)			
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Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

	Endangered Species Act (16 USC 1531 et. seq)	(b) (5)			
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Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

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

(b) (5)

Assistant Secretary – Insular and International Affairs  
Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

(b) (5)

**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					
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.					
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.					
(b) (5)					
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.	(b) (5)			

**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					
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.					
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)	ESA (Endangered Species Act) - 50 CFR §402.05;  NEPA (National Environmental Policy Act) - 40 CFR §1506.11;  NHPA(National Historic Preservation Act)/Sec 106 - 36 CFR §800.12	(b) (5)			



			(b) (5)		
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Milestones	Due Date	Measurable Metrics
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(b) (5)
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Initiative					
<b>Section 4.b.</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.					
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><a href="#">ESA</a> 50 CFR §402.05 – Emergencies</p> <p>(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>	<p>(b) (5)</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)

	(b) (5)
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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](mailto: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

<b>Responsive to</b>	SO 3417 – Addressing the National Energy Emergency
<b>Accountable</b>	Assistant Secretary for Land and Minerals Management
<b>Submitted by</b>	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
(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:

(b) (5)

**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> <p>1. Fluid Mineral Leases and Leasing Process, 89 Fed. Reg. 30916 (Apr. 23, 2024) and related documents:</p> <ul style="list-style-type: none"><li>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.</li><li>Handbooks and manual provisions implementing changes made by the Fluid Mineral Leases and Leasing Process rule.</li></ul> <p>2. 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).</p> <p>3. Rights-of-Way, Leasing, and Operations for Renewable Energy, 89 Fed. Reg. 35634 (May 1, 2024).</p> <p>4. Conservation and Landscape Health, 89 Fed. Reg. 40308 (May 9, 2024) and related documents:</p> <ul style="list-style-type: none"><li>IM 2024-035 Implementation Guidance, IB 2024-048 Land Use Planning Requirements, IM 2024-035 Restoration Prioritization &amp; Planning, IM 2024-036 Watershed Condition Assessment, IM 2024-037 Land Health Standards, IM 2024-038 Restoration &amp; Mitigation Leasing, Manual Section-1613 Areas of Critical Environmental Concern</li></ul>					
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)		

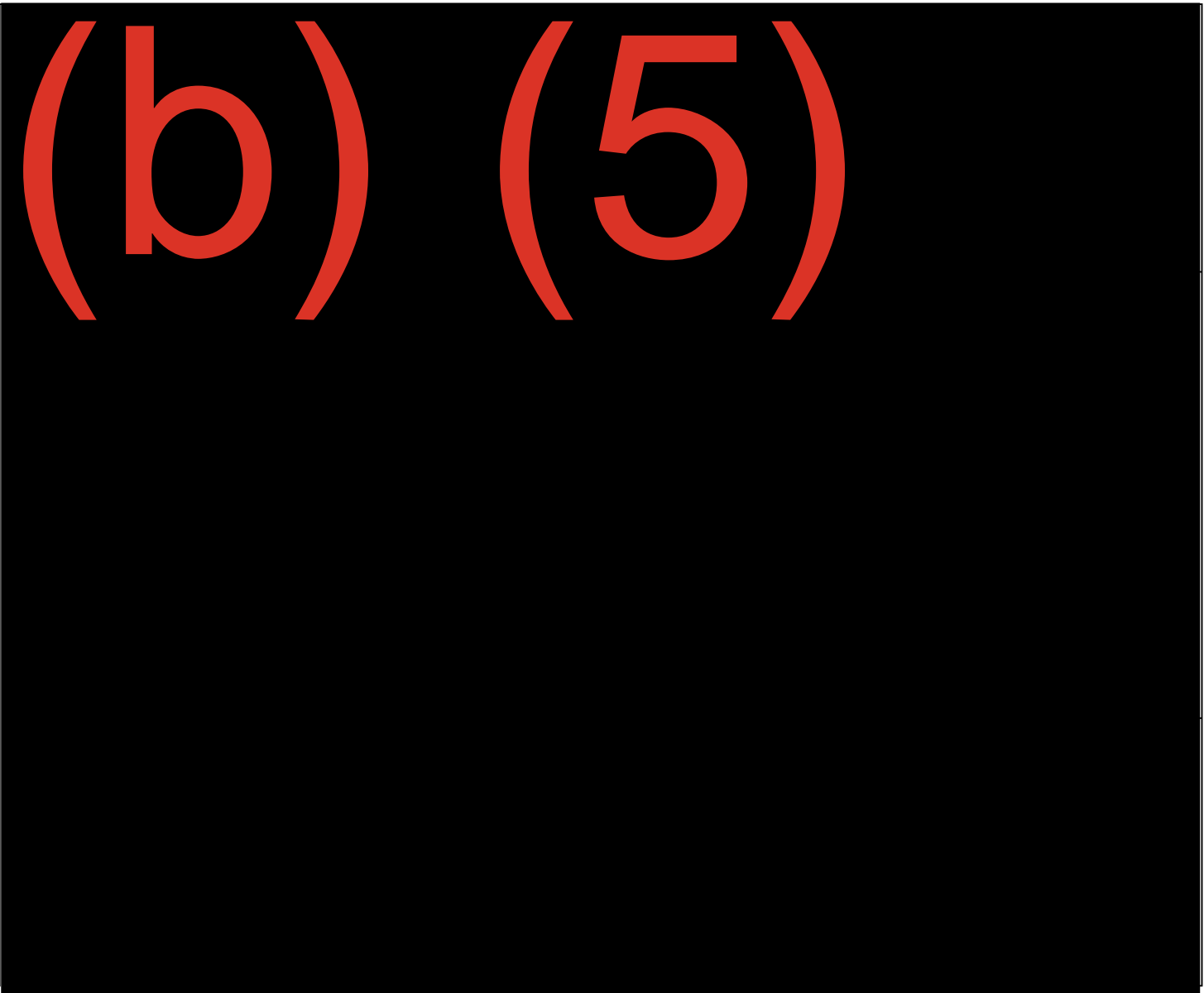
Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Bureau of Land Management				
Initiative					
Section 4(c). The BLM is developing a plan of action and schedule for review of all relevant draft, proposed, and finalized RMPs and RMP Amendments and associated EISs including, but not limited 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:					
<div><div>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)</div><div>2. Proposed RMP Amendment and Final EIS for Greater Sage-Grouse Rangewide Planning (NOA, 89 Fed. Reg. 90311, Nov. 15, 2024)</div><div>3. Record of Decision and Approved RMP Amendment for the Buffalo Field Office, Wyoming (NOA, 89 Fed. Reg. 93650, Nov. 27, 2024)</div><div>4. Record of Decision and Approved RMP Amendment for the Miles City Field Office, Montana (NOA, 89 Fed. Reg. 93650 (Nov. 27, 2024)</div><div>5. Unreleased draft Uncompahgre Field Office RMP</div><div>6. Draft Carlsbad RMP Revision</div><div>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.)</div></div>					
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)	
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"><li>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);</li><li>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);</li><li>3. Public Land Order No. 7940; Placitas Area Withdrawal, New Mexico (89 FR 31763); and</li><li>4. Withdrawal Application, Ruby Mountains, Nevada (U.S. Forest Service application) (89 FR 107157).</li></ol> <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)					



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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**

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

**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	(b) (5)			

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Milestones	Due Date	Measurable Metrics
(b) (5)		

<b>Responsive to</b>	SO 3418 - Unleashing American Energy				
<b>Accountable</b>	Bureau of Land Management				
<b>Initiative</b>					
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.					
<b>Policy goal(s)</b>	<b>Legal Authority</b>	<b>Recommendations</b>	<b>Barriers to Overcome</b>	<b>Metrics for Success</b>	<b>Final Due Date</b>
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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<b>Responsive to</b>	SO 3418 - Unleashing American Energy
<b>Accountable</b>	Bureau of Land Management
<b>Initiative</b>	
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	(b) (5)			
Eliminate undue burdens on development	NHPA and implementing regulations				

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

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



**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					
<p>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): <b>"Proposed Final Program, 2024-2029 National Outer Continental Shelf Oil and Gas Leasing 5-Year Plan" (September 29, 2023).</b></p> <p>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.</p>					
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			
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		
(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): <b>"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)</b>					
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
(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: <b>Actions to review all relevant internal regulations, policies, and guidance to ensure the lawful implementation of NHPA section 106</b>					
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: <b>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.</b>					
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
<div data-bbox="98 146 1113 535">(b) (5)</div>		

		(b) (5)
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**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 11<sup>th</sup> National Program](#)

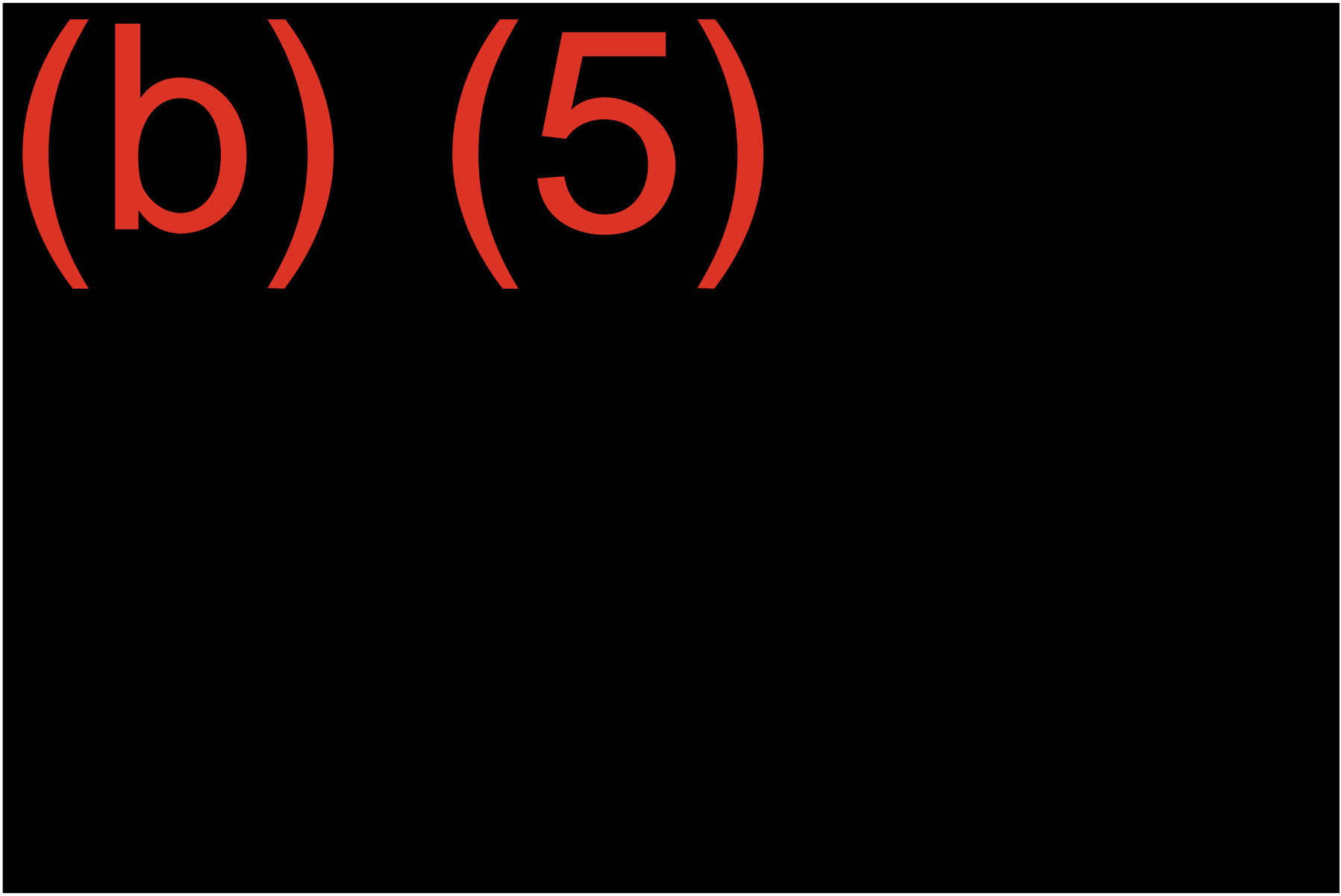
Attachment 5: [SO3418-Attachment5-NHPA Section 106 Review Summary](#)

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

(b) (5)



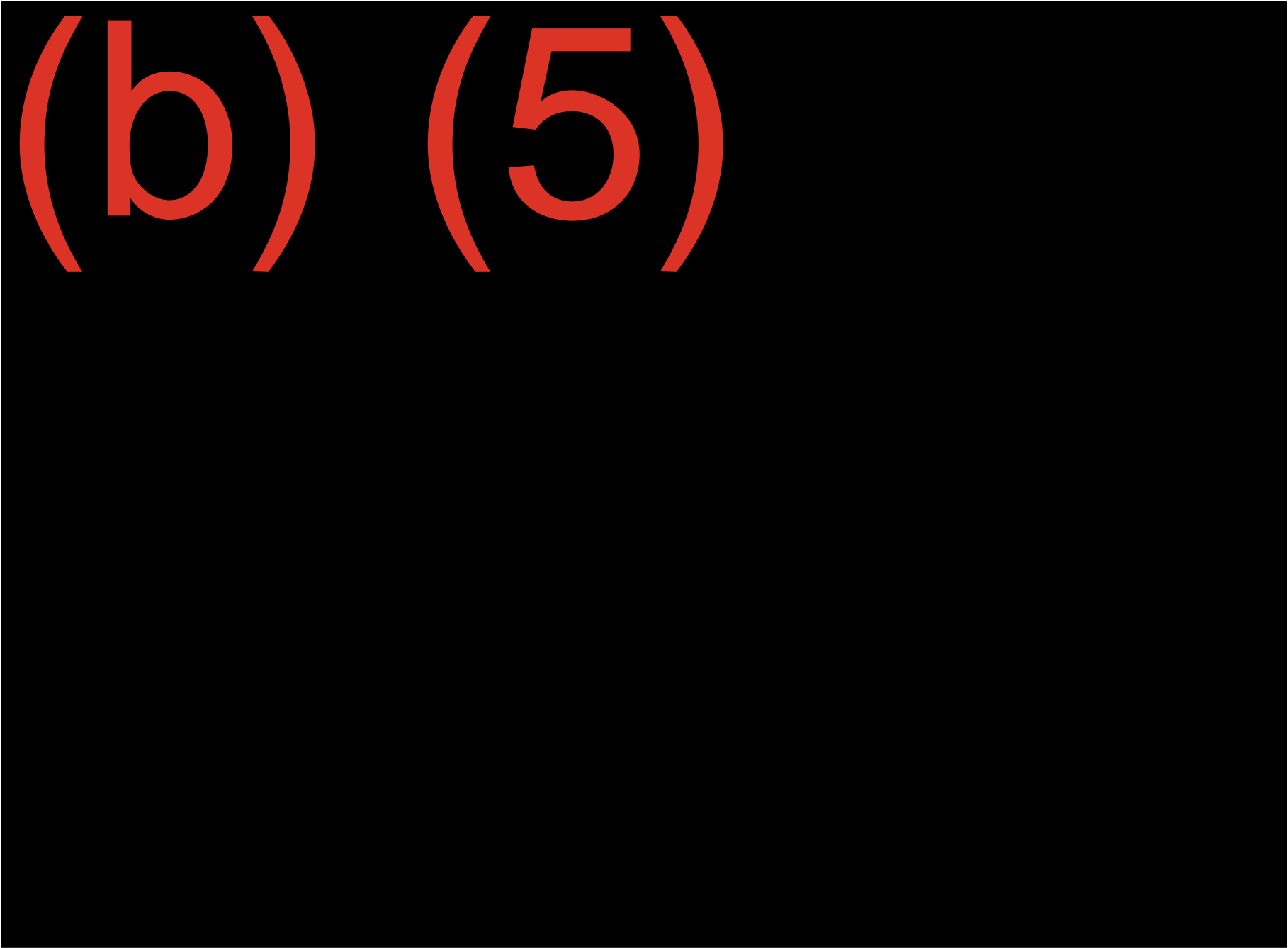
(b) (5)



(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).

(b) (5)

Potential Action: (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:** 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.

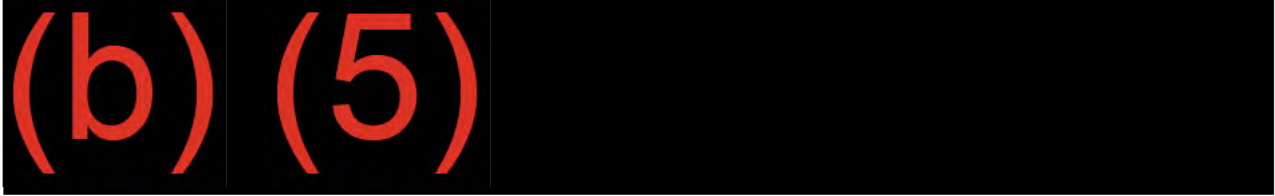
BOEM has developed budget estimates for FY 2025 and FY 2026 to support the expedited development of a new (11th) National OCS Program and has developed a tentative schedule that would allow for 11<sup>th</sup> National OCS Program approval in roughly (b) (5).

(b) (5)



# United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT  
WASHINGTON, DC 20240-0001



**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 11<sup>th</sup> National OCS Program

(b) (5)

Draft Project Schedule for the 11<sup>th</sup> National OCS Program

(b) (5)

## Draft Project Schedule for the 11<sup>th</sup> 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)			



# United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT  
WASHINGTON, DC 20240-0001

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(b) (5)



# United States Department of the Interior

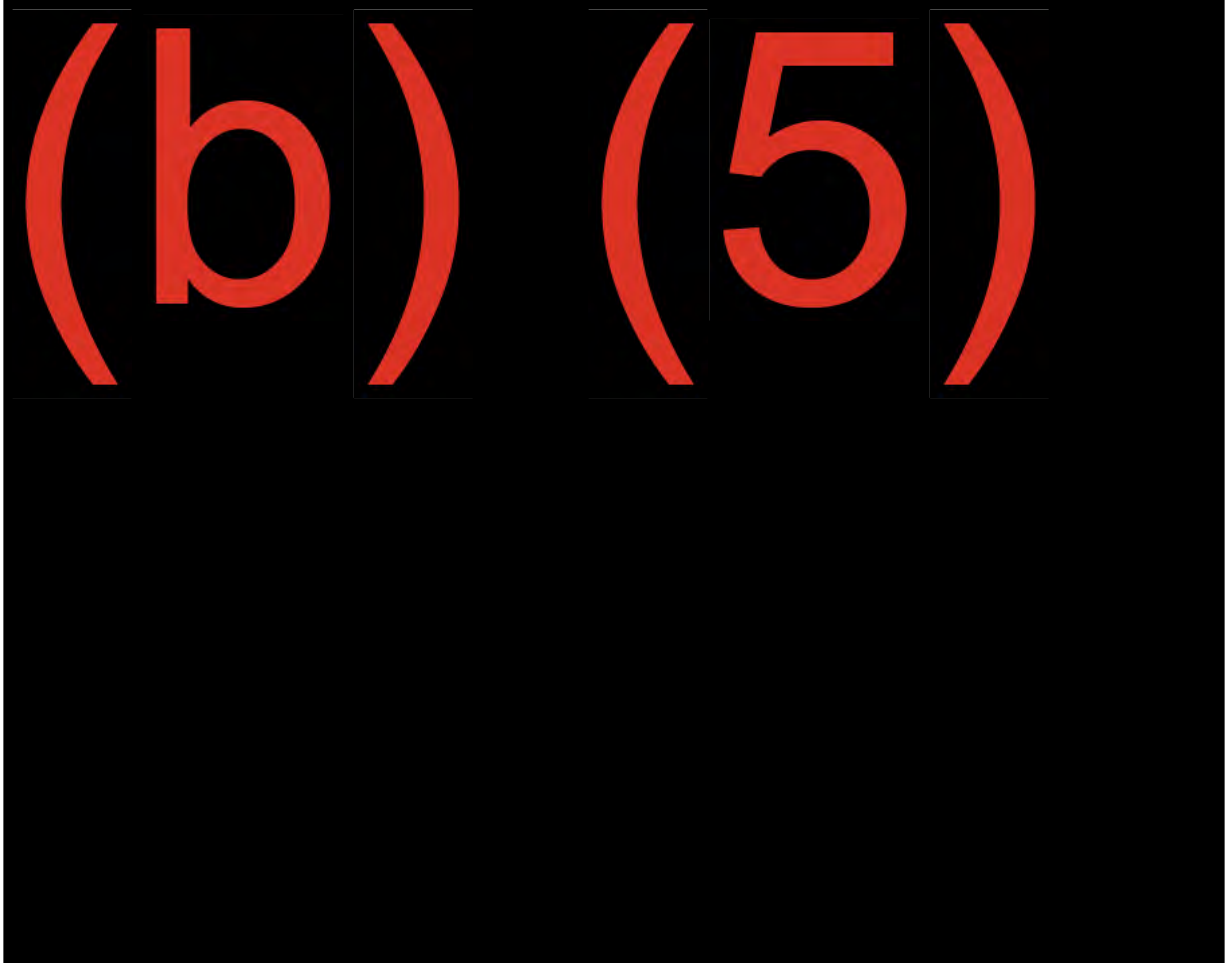
BUREAU OF OCEAN ENERGY MANAGEMENT  
WASHINGTON, DC 20240-0001

(b) (5)



# United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT  
WASHINGTON, DC 20240-0001







# 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)



# United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT  
WASHINGTON, DC 20240-0001

(b) (5)

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

(b) (5)



# United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT  
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)

(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](mailto: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					
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
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
(b) (5)		

**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)					

(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. <b>Purpose.</b> 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. <b>Purpose.</b> 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:**

(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)

Additional Information: (b) (5)

[Redacted text block]

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

**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 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
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 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
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.	O&C Act  FLPMA  NEPA	(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 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
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)					
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)			
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 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
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)					
(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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(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 developing (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.	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
(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 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
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)					
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	<b>Inflation Reduction Act Section 50261:</b> 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

**To:** Charlie Dankert  
Acting Assistant Secretary, Policy, Management, and Budget

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

**Subject:** BOEM Analysis of SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis

## Informational Memo

Secretarial Order 3419 directs agencies to consider any “policies and decisions that directly or indirectly increase costs” and to “particularly focus on coercive ‘climate’ policies that increase the cost of food or energy.”

Because the oil market is global, the policies and regulations of any one country are unlikely to lead to changes in global oil prices. However, policies and regulations can impact producers at the margin, potentially making some prospects uneconomic or possibly incentivizing companies to move to more economically attractive basins.

After reviewing recent policies, BOEM identified (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]



# 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](mailto: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					
Sec. 4. <b>Implementation.</b> 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
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					
Sec. 4. <b>Implementation.</b> 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
(b) (5)					
Milestones	Due Date	Measurable Metrics			

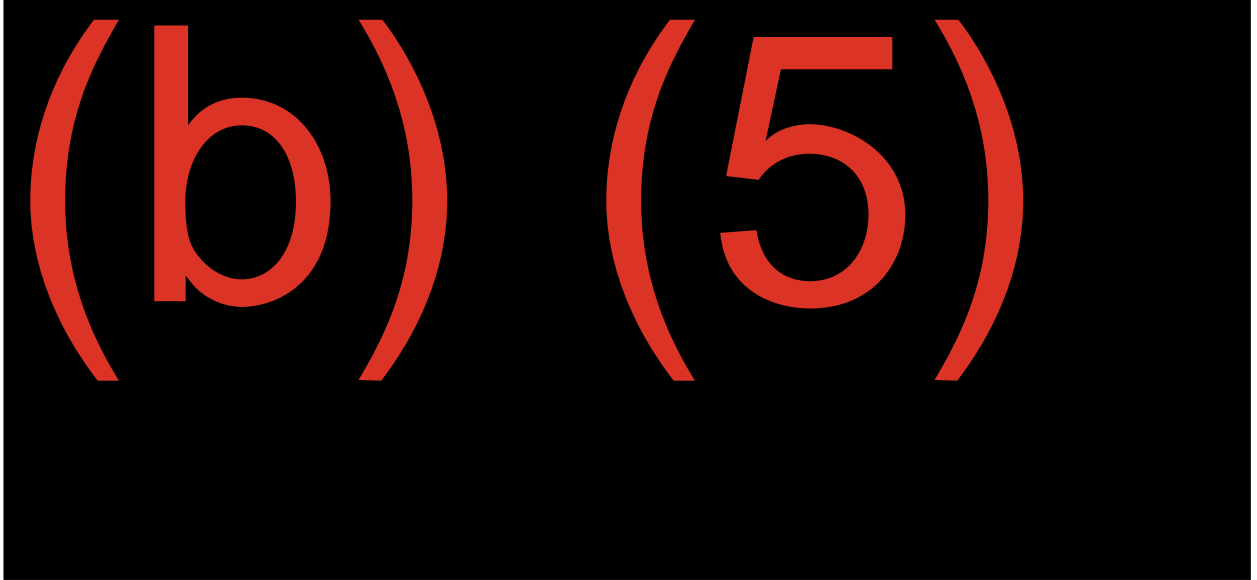
(b) (5)

**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

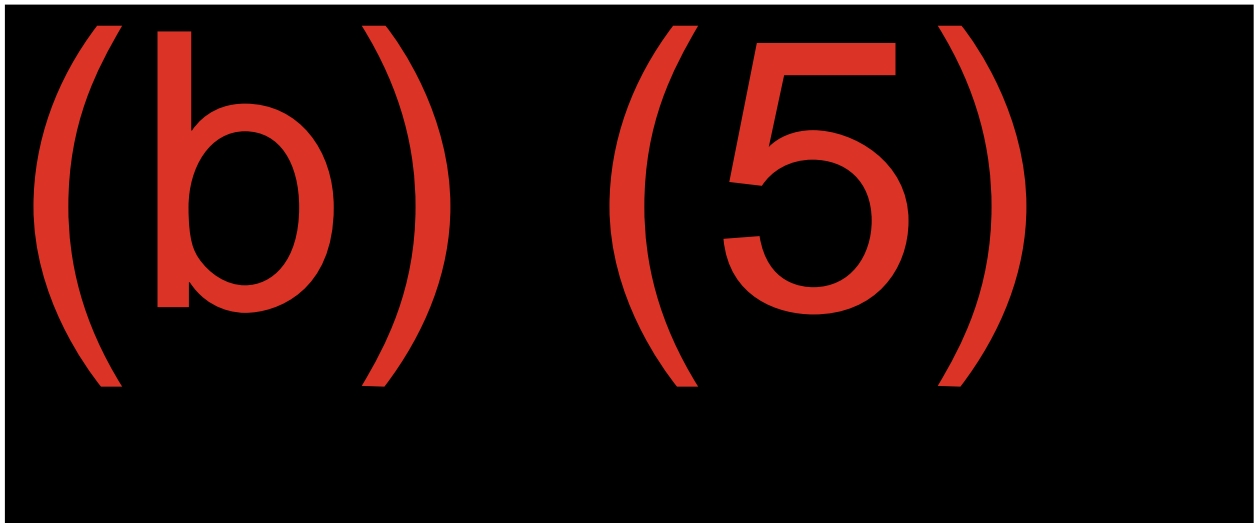
To: Cara Lee Macdonald  
Chief of Staff, Exercising the Delegated Authorities of  
the Assistant Secretary, Land and Minerals Management

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](mailto: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](mailto: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](mailto: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)**

(b) (5)

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

(b) (5)

**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)

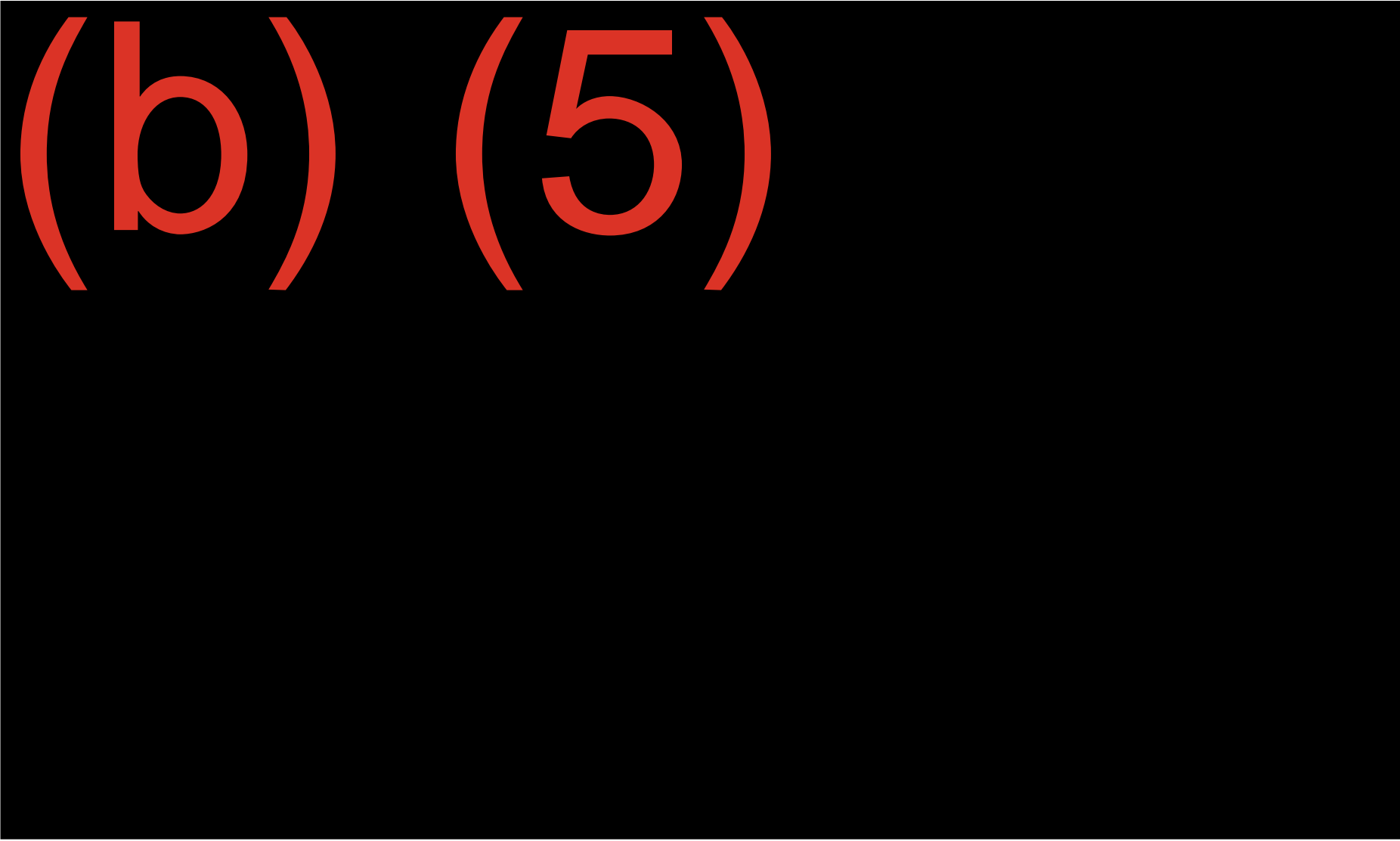
**Additional Information:**

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)			
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)

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).					
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)					

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))

(b) (5)

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
Review & Identify withdrawals that could be revoked to support achieving the goals of EO 14153 Section 2.  Review & identify any remaining ANCSA withdrawals that could be revoked pursuant to EO 14153 Section 3(b)(xvi).	Authority used to withdraw the land, as cited in the PLOs.  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))

(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))

(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))

**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	Measurable Metrics			
(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)(xiii) 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](mailto: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

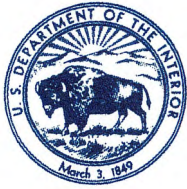
Attachment 2 - Hilcorp Response Letter for Liberty SOP

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 § 250.1 72(d) authorizing BSEE to grant an SOP to 'carry out the requirements of NEPA or to conduct an environmental analysis[']; and 30 CFR § 250.1 72(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 (RAFI), 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 RAFI 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 RAFI, 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 RAFI 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.<sup>1</sup> 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

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<sup>1</sup> 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](mailto: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

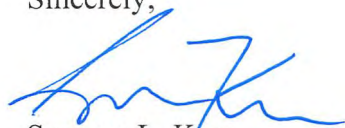
1111 Travis Street  
Houston, Texas 77002

Phone: 713/209-2400  
Fax: 713/209-2478

**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,

A handwritten signature in blue ink, appearing to read "Spencer L. Kerr", with a stylized flourish at the end.

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](mailto: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)

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Request for Additional Information</i>
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

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Request for Additional Information</i>
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</i> , <i>Master Wildlife Compliance Procedure</i> , <i>Avian Mortality Monitoring and Reporting guidance</i> , and <i>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

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Request for Additional Information</i>
19	DPP	54	8.3.1 Projected Emissions	<p>Include BOEM-0139 air emissions worksheets (<a href="https://www.boem.gov/boem-0139">https://www.boem.gov/boem-0139</a>) 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 <a href="https://www.boem.gov/environment/environmental-studies/overview-air-quality-regulations">https://www.boem.gov/environment/environmental-studies/overview-air-quality-regulations</a>.</p> <p>Detailed instructions for using these worksheets are provided in the BOEM-0139 Air Emissions Calculation Instructions found at <a href="https://www.boem.gov/boem-0139-instructions">https://www.boem.gov/boem-0139-instructions</a>. 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 <a href="https://espis.boem.gov/final%20reports/5440.pdf">https://espis.boem.gov/final%20reports/5440.pdf</a>. 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>

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Request for Additional Information</i>
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 <sub>3</sub> , etc.). See 30 CFR 550.249

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Request for Additional Information</i>
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)



<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Request for Additional Information</i>
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)

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Comment/Clarification</i>
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.

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Comment/Clarification</i>
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)

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Comment/Clarification</i>
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.

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Comment/Clarification</i>
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)

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Comment/Clarification</i>
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.

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Comment/Clarification</i>
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)

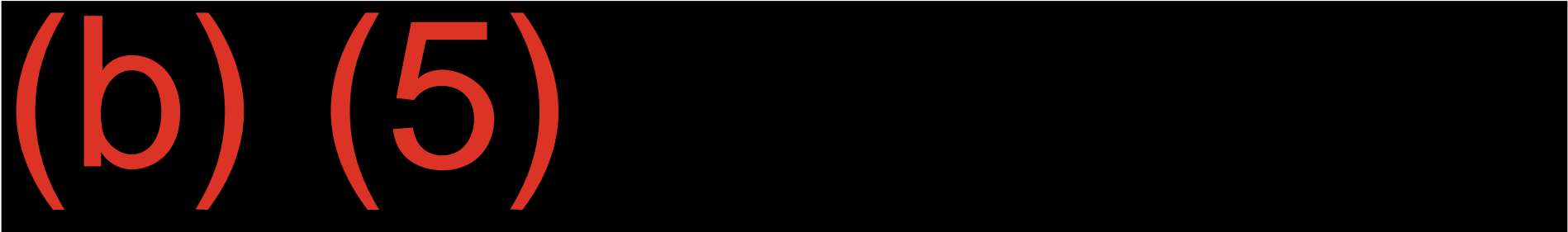


<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Comment/Clarification</i>
54	EIA	89	Section 3.22.3.1	Subsection title 3.22.3.1 could be clarified as: Effects of the Liberty Project from Spills.
55	EIA	92	4.3	The EIA addresses cumulative impacts for Air Quality, Social Systems/Economics, 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.

<i>Item Number</i>	<i>Document</i>	<i>Page #</i>	<i>Section</i>	<i>Comment/Clarification</i>
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

**Summary:** The Office of the Assistant Secretary – Policy, Management and Budget (AS-PMB) provides overall policy direction, leadership, guidance, and assistance on a broad range of management and operational issues that directly affect the Interior Department’s ability to fulfill its mission. The AS-PMB serves in a number of statutorily designated positions including as the agency’s Chief Financial Officer, Chief Acquisition Officer, and Chief Performance Officer. AS- PMB Divisions and Offices have reviewed SO 3417 and identified key areas of responsibility to support the implementation of the SO and assist the Department in meeting its responsibilities under the Executive Order – Addressing the National Energy Emergency.

**Top priorities:**



**Additional Information:** Much of PMB’s work and areas of responsibility are focused on supporting Bureaus and Offices across the Department in their implementation efforts. PMB works in close coordination with the other Assistant Secretary Hallways and Bureaus to ensure coordinated implementation across the Department. The Actions outlined below will be coordinated directly with the appropriate Bureaus and Offices.

**Deputy Assistant Secretary Policy & Environmental Management:**

<b>Responsive to</b>	SO 3417 – Addressing the National Energy Emergency
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Accountable	DAS-PEM, reporting for OEPC, ORDA, OWPO, and PPP offices.				
Initiative					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date1.
(b) (5)					

(b) (5)

(b) (5)

**Deputy Assistant Secretary Budget, Finance, Grants, & Acquisitions:**

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Office of Budget (POB)				
Initiative					
Sec. 4 Directives – all Bureaus and Offices will identify relevant emergency and other legal authorities to facilitate/expedite work on various energy priorities and develop plan for use of those authorities to the Secretary within 15 days.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
FY 2026 President’s Budget supports this SO	N/A	(b) (5)			
Leverage emergency procurement flexibilities	Federal Acquisition Regulation Part 18				

		declaration from the President	emergency that would merit such flexibilities		
Milestones	Due Date	Measurable Metrics			
(b) (5)					

**Deputy Assistant Secretary Administrative Services:**

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Office of Hearings and Appeals (OHA)				
Initiative					
Review pending cases for compliance with SO 3417 and prioritize and expedite cases consistent with SO 3417					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Prioritizing and expediting cases relating to energy exploration	Various statutes and regulations requiring hearings and appeals	(b) (5)			



and production		cases consistent with priorities of SO 3417			

<b>Responsive to</b>	SO 3417 – Addressing the National Energy Emergency
<b>Accountable</b>	Appraisal and Valuation Services Office (AVSO)
<b>Initiative</b>	

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Our focus must be on advancing innovation to improve energy and critical minerals identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation capacity of the United States to provide a reliable, diversified, growing, and affordable supply of energy for our Nation. (b) (5)	Multiple legal authorities require appraisals to determine the fair market rent/compensation for rights-of-way across federal and Indian lands.  25 CFR Part 169 36 CFR Part 14 43 CFR Part 429 43 CFR Part 2800 50 CFR Part 29	(b) (5)			

Milestones	Due Date	Measurable Metrics
(b) (5)		

(b) (5)

Additional Information (b) (5)

(b) (5)

(b) (5)

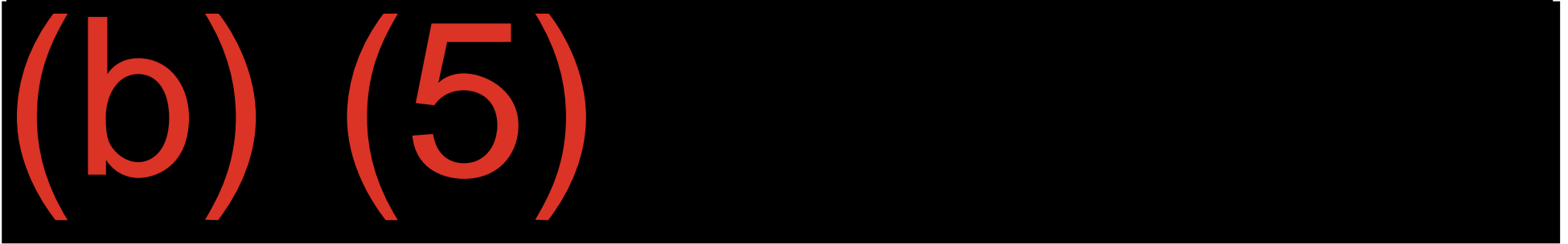
Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Office of Collaborative Action and Dispute Resolution				
Initiative					
Initiative – Section 4b: Support DOI bureaus and offices to expedite the completion of infrastructure, energy, environmental, and natural resources projects to facilitate the supplying, refining, transporting, and exporting of energy.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Efficient and cost-effective execution of mission-critical projects by reducing internal bureaucratic obstacles and potential judicial barriers.	Administrative Dispute Resolution Act of 1996, 5 U.S.C. §571 et seq	(b) (5)			



Milestones	Due Date	Measurable Metrics
(b) (5)		

**Office of Associate Chief Information Officer:**

Responsive to		SO 3417 – Addressing the National Energy Emergency			
Accountable		Harrell Watkins			
Initiative					
Sec. 4 Directives – all Bureaus and Offices will identify relevant emergency and other legal authorities to facilitate/expedite work on various energy priorities and develop plan for use of those authorities to the Secretary within 15 days.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
IT Capital Planning and Investment Control supports this SO	Paper Reduction Act (1995) Clinger-Cohen Act (1996) E-Government (2002) Federal IT Acquisition Reform Act (2014)	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					



**Office of Natural Resources Revenue:**

Office of Natural Resources Revenue (ONRR) manages and ensures full payment of revenues owed for the development of the nation's energy and natural resources on the Outer Continental Shelf and onshore Federal and Indian lands. While ONRR does not have direct responsibilities for action plans under this SO, ONRR will continue to coordinate with ASLM and other DOI Bureaus and Offices to provide collection, verification, and disbursement support.

**The following PMB Divisions and Offices reviewed SO 3417 and determined that their areas of responsibility are outside the scope of this report:**

- Deputy Assistant Secretary Public Safety, Resource Protection, & Emergency Management
- Deputy Assistant Secretary Human Capital and Diversity; Chief Human Capital Officer
- Office of Chief Information Officer
- Office Of Facilities and Administrative Services
- Office of Diversity, Inclusion, and Civil Rights
- Bipartisan Inflation Law (BIL) and Inflation Reduction Act PMO
- Great American Outdoor Act PMO

## Assistant Secretary – Policy, Management, and Budget Action Plan for SO 3418 - Unleashing American Energy

**Summary:** The Office of the Assistant Secretary – Policy, Management and Budget (AS-PMB) provides overall policy direction, leadership, guidance, and assistance on a broad range of management and operational issues that directly affect the Interior Department’s ability to fulfill its mission. The AS-PMB serves in a number of statutorily designated positions including as the agency’s Chief Financial Officer, Chief Acquisition Officer, and Chief Performance Officer. AS- PMB Divisions and Offices have reviewed SO 3418 and identified key areas of responsibility to support the implementation of the SO and assist the Department in meeting its responsibilities under the Executive Order – Unleashing American Energy.

### Top priorities:

- The Infrastructure PMO has identified the following priorities:

(b) (5)

(b) (5)

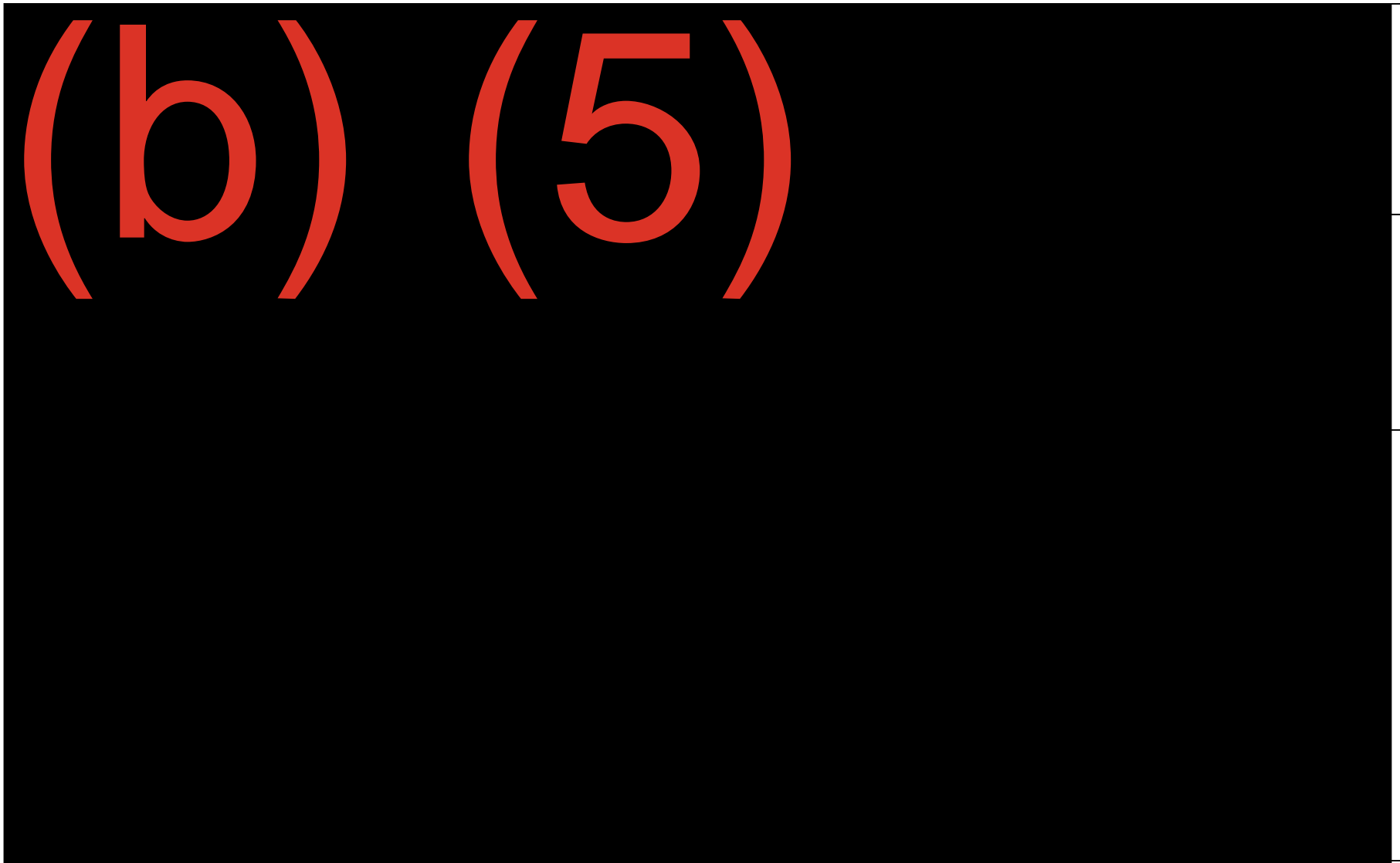
**Additional Information:** Many of the organizations within the PMB portfolio provide support functions that enable critical mission work and priorities across the Department’s Bureaus and Offices. PMB works in close coordination with the other Assistant Secretary hallways and bureaus to ensure coordinated implementation across the Department. The actions outlined below will be coordinated directly with the appropriate bureaus and offices.

**Deputy Assistant Secretary Budget, Finance, Grants and Acquisition**

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	Office of Budget (POB)				
Initiative					
Sec. 4 Directive = Assistant Secretaries directed to review agency actions and submit an action plan to implement the revoked EOs; suspend, revise, or rescind other relevant documents; accomplished other named actions in the SO; and the AS-PMB is directed to include in their action plan a review that includes, but is not limited to, their processes, policies, and programs for issuing grants, loans, contracts, or any other financial disbursements of all appropriated funds from the Inflation Reduction Act of 2022 (Public Law 117-169) and the Infrastructure Investment and Jobs Act (Public Law 117-58) for consistency with the policy in section 3 of this SO					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
FY 2026 President's Budget supports this SO	N/A	(b) (5)			
DOI's contracts support this goal	N/A				



		(b) (5)	
Leveraging the Financial and Business Management System (FBMS) to ensure proper system controls and compliance with the SO	N/A		
Milestones	Due Date	(b) (5)	



<b>Responsive to</b>	SO 3418 – Unleashing American Energy
<b>Accountable</b>	Office of Financial Management (PFM)

Initiative					
EO 14057 of December 8, 2021, titled "Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability";					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
FINANCIAL MANAGEMENT MEMORANDUM 2024-025 - Discussion of Sustainable Travel Methods for Official Temporary Duty (TDY) Travel	EO 14057 of December 8, 2021, titled "Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability"	(b) (5)			
FINANCIAL MANAGEMENT MEMORANDUM 2024- 031 - Zero-Emission Vehicles	EO 14057 of December 8, 2021, titled "Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability"				

(ZEV) Rental Car Use During Official Temporary Duty (TDY) Travel Guidance		(b) (5)
Milestones	Due Date	Measurable Metrics
(b) (5)		

Responsive to	SO 3418 - Unleashing American Energy
Accountable	Office of Grants Management (PGM)
Initiative	
SO 3418 Section 4.d. Review DOI financial assistance processes, policies, and programs for issuing grants, loans, or any other financial assistance disbursements of all appropriated funds from the Inflation Reduction Act of 2022 (Public Law 117-169) and the Infrastructure Investment and Jobs Act (Public Law 117-58) for consistency with the policy in section 3 of SO 3418.	



Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
All DOI financial assistance (FA) Notice of Funding Opportunities (NOFO) are consistent with SO 3418 requirements.	Federal Grant and Cooperative Agreement Act of 1977  2 CFR Part 200 NOFO Simplification Guidance	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)

Responsive to		SO 3418 - Unleashing American Energy			
Accountable		Office of Grants Management (PGM) report to DAS-BFGA			
Initiative					
SO 3418 Section 4.d. Review DOI financial assistance processes, policies, and programs for issuing grants, loans, or any other financial assistance disbursements of all appropriated funds from the Inflation Reduction Act of 2022 (Public Law 117-169) and the Infrastructure Investment and Jobs Act (Public Law 117-58) for consistency with the policy in section 3 of SO 3418.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
All Financial assistance (FA) awards (including new and amended) must be reviewed	Federal Grant and Cooperative Agreement Act of 1977  2 CFR Part 200  2 CFR 200.340 (a) (4) Termination	(b) (5)			

by bureau lead program offices and FA policy offices for consistency with SO 3418 prior to approval.		(b) (5)		
Milestones	Due Date	Measurable Metrics		
(b) (5)				





Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Office of Small and Disadvantaged Business Utilization				
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
Review and revise the DOI	15 U.S. Code § 637(a)(12)(c)	(b) (5)			

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

(b) (5)

Deputy Assistant Secretary Policy & Environmental Management:

Responsive to	SO 3418 - Unleashing American Energy	
Accountable	DAS-PEM, reporting for OEPC, ORDA, OWPO, and PPP offices	
Initiative		
Milestones	Due Date	Measurable Metrics
(b) (5)		



**Deputy Assistant Secretary Administrative Services:**

**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


Responsive to	SO 3418 - Unleashing American Energy
Accountable	Office of Hearings and Appeals
Initiative	

Review pending cases for compliance with SO 3418 and prioritize cases consistent with SO 3418					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Prioritizing cases relating to energy exploration and production	Various statutes and regulations requiring hearings and appeals	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					



Responsive to		SO 3418 – Unleashing American Energy			
Accountable		Appraisal Valuation Services Office			
Initiative					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Our focus must be on advancing innovation to improve energy and critical minerals identification, permitting, leasing, development, production, transportation, refining, distribution, exporting, and generation capacity of the United States to provide a reliable, diversified, growing, and affordable supply of energy for our Nation, not on the acquisition of additional lands unless they follow the above guidance.	Multiple legal authorities require appraisals to determine the fair market rent/compensation for rights-of-way across federal and Indian lands.  25 CFR Part 169 36 CFR Part 14 43 CFR Part 429 43 CFR Part 2800 50 CFR Part 29	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)





**Additional Information:** (b) (5)

(b) (5)

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Office of Collaborative Action and Dispute Resolution				
Initiative					
Initiative – Section 4b: Support DOI bureaus and offices to expedite the completion of infrastructure, energy, environmental, and natural resources projects to facilitate the supplying, refining, transporting, and exporting of energy.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Efficient and cost-effective execution of mission-critical projects by reducing internal bureaucratic obstacles and potential	Administrative Dispute Resolution Act of 1996, 5 U.S.C. §571 et seq	(b) (5)			

judicial barriers.				(b) (5)	
Milestones	Due Date	Measurable Metrics			
(b) (5)					

- IBC will continue to work under the direction of BFGA and PAM to fulfill the requirements of Section 4a. As a federal shared service provider that operates under a fee-for-service full-cost recovery model, IBC provides mission support services to customers within DOI and externally. We do not have responsibilities for action plans under this SO. Our services include the full lifecycle of acquisitions management, human resources operations, project management, Contracting Officer's Representative (COR) support, general accounting, billings and collections, vendor payments, and other financial management-related services. To the extent that DOI Bureaus and Offices identify the need for services that IBC provides in their action plans, IBC is available to work with them to provide those services as they implement their action plans to support SO 3418.

Responsive to	SO 3418 - Unleashing American Energy
Accountable	Interior Business Center
Initiative	
SO 3418 4a. Actions taken to implement revoked Eos	

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
					TBD by PAM and BFGA
Milestones	Due Date	Measurable Metrics			
(b) (5)					

**Bipartisan Inflation Law (BIL) and Inflation Reduction Act PMO:**

*Summary:* In several areas actions have been identified that could be taken with existing authorities and funding to further the implementation of SO3418. The priorities identified below focus on (b) (5)

*Additional Information:* (b) (5)



**Permitting Reform and Investment Realignment**

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	OS-PMB (BIL/IRA PMO, OEPC) and DOI Bureaus and Offices				
Initiative					
Section 4c – “actions that prioritize reducing barriers to the use of Federal lands for energy development, consistent with the principle of multiple use;” “actions to implement new and amended policies and procedures to increase the efficiency in the Bureau of Land Management's adjudication of applications for permits to drill;” “actions to review and, as appropriate, revise all undue burdens on the domestic mining and processing of nonfuel minerals.”					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Sec 3. (a) “encouraging 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	IRA Section 50303 Environmental Reviews  Interagency Agreements authorized by IRA Section 70007 Environmental Review Improvement Fund	(b) (5)			

<p>energy leader long into the future,” and (f) “guaranteeing that all executive departments and agencies provide opportunity for public comment and rigorous, peer-reviewed scientific analysis.”</p>		(b) (5)		
Milestones	Due Date	Measurable Metrics		
(b) (5)		(b) (5)		

(b) (5)

(b) (5)

**Critical Minerals and Mapping**

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	USGS				
Initiative					
Section 4c— “...actions to update the U.S. Geological Survey’s list of critical minerals, including the potential to include uranium; 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
SO 3418 Sec 3. (b) “...establishing our position as the leading producer and processor of nonfuel minerals, including rare earth minerals which will create jobs and prosperity at home, strengthen supply chains for the United States and its allies, and reduce the global influence of malign and adversarial states...”	IIJA Section 40201: Earth Mapping Resources Initiative 40203: National Geological and Geophysical Data Preservation Program, and 40204: Energy and Minerals	(b) (5)			



	Research Facility	(b) (5)	
	IRA Section 50271: USGS 3D Elevation Program		
Milestones	Due Date	Measurable Metrics	
(b) (5)			

(b) (5)

**NHPA Section 106 Requirements**

Responsive to		SO 3418 - Unleashing American Energy			
Accountable		OS PMB			
Initiative					
Section 4c – “actions to review all relevant internal regulations, policies, and guidance to ensure the lawful implementation of section 106 of the National Historic Preservation Act.”					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Sec 3. (d) “ensuring that all regulatory requirements related to energy are grounded in clearly applicable law.”	36 CFR Part 800 National Historic Preservation Act Section 106  519 Departmental Manual 1 Preservation of Historic Property	(b) (5)			
Milestones		Due Date	Measurable Metric		
(b) (5)					

(b) (5)

**IIJA and IRA Obligated and Expended Project Review and Spend Plans for Unobligated Funds**

Responsive to	SO 3418 - Unleashing American Energy				
Accountable	OS PMB (BIL/IRA PMO) and DOI Bureaus and Offices				
Initiative					
Section 4c – “actions that prioritize reducing barriers to the use of Federal lands for energy development, consistent with the principle of multiple use;” “actions to implement new and amended policies and procedures to increase the efficiency in the Bureau of Land Management's adjudication of applications for permits to drill;” “actions to review and, as appropriate, revise all undue burdens on the domestic mining and processing of nonfuel minerals.”					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Sec 3. (a) “encouraging 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	Various in IIJA and IRA	(b) (5)			



future,” and (f) “guaranteeing that all executive departments and agencies provide opportunity for public comment and rigorous, peer-reviewed scientific analysis.”		(b) (5)			
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Milestones	Due Date	Measurable Metrics
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(b) (5)		
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**Office of Natural Resources Revenue:**

**Summary:** ONRR will work with senior leadership to (b) (5)

[Redacted text block]

**Top priorities:** (b) (5)

[Redacted text block]



Additional Information: (b) (5)



Responsive to	SO 3418 - Unleashing American Energy				
Accountable					
Initiative					
Move forward with ONRR’s alternative plan to amend the regulations consistent with the Administration’s priorities to reduce burden and improve simplicity					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Comply with the APA, S.O. 3418, E.O.s	30 U.S.C. §§ 1701-1759	(b) (5)			

<b>Milestones</b>	<b>Due Date</b>	<b>Measurable Metrics</b>
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(b) (5)

(b) (5)



(b) (5)



**The following PMB Divisions and Offices reviewed SO 3418 and determined that their areas of responsibility are outside the scope of this report:**

- Deputy Assistant Secretary Public Safety, Resource Protection, & Emergency Management
- Deputy Assistant Secretary Human Capital and Diversity; Chief Human Capital Officer
- Office of Chief Information Officer
- Office of Associate Chief Information Officer
- Office Of Facilities and Administrative Services
- Office of Diversity, Inclusion, and Civil Rights
- Great American Outdoor Act PMO

## **Assistant Secretary – Policy, Management and Budget Action Plan for SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis**

**Summary:** The Office of the Assistant Secretary – Policy, Management and Budget (AS-PMB) provides overall policy direction, leadership, guidance, and assistance on a broad range of management and operational issues that directly affect the Department of the Interior’s (Department or Interior) ability to fulfill its mission. The AS-PMB serves in a number of statutorily designated positions, including as the Department’s Chief Financial Officer, Chief Acquisition Officer, and Chief Performance Officer. AS- PMB Divisions and Offices have reviewed SO 3419 (SO) and identified key areas of responsibility to support the implementation of the SO and assist the Department in meeting its responsibilities under the Executive Order - Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis.

### **Top priorities:**

A large black rectangular redaction box covering the top priorities section. Overlaid on the left side of the box are the red text characters "(b) (5)".

**Additional Information:** Much of AS-PMB’s work and areas of responsibility are focused on supporting Bureaus and Offices across the Department in their implementation efforts. AS-PMB works in close coordination with the other Assistant Secretary hallways and Bureaus to ensure coordinated implementation across the Department. The actions outlined below will be coordinated directly with the appropriate Bureaus and Offices.

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

Deputy Assistant Secretary Policy & Environmental Management (DAS-PEM):

Responsive to	SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
Accountable	DAS-PEM, reporting for OEPC, Office of Restoration and Damage Assessment (ORDA), Orphaned Wells Program Office (OWPO), and Office of Policy and Performance Management (PPP) offices.				
Initiative					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Milestones	Due Date	Measurable Metrics			
State Action that Needs to Be Taken:	List Target Due Date for Action:	Define Metrics that Will Measure Success for Each Action Being Taken by Each Due Date:			
(b) (5)					



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

		including the creation of employment opportunities for American workers. <a href="https://link.springer.com/article/10.1007/s00267-024-02040-x">https://link.springer.com/article/10.1007/s00267-024-02040-x</a>
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Deputy Assistant Secretary Budget, Finance, Grants, & Acquisitions (DAS-BFGA):

Responsive to	SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
Accountable	Office of Budget (POB)				
Initiative					
Sec. 5 Responsibilities - The AS-PMB is responsible for monitoring Bureau and Office compliance with this Order, compiling the Bureau and Office reports, and overseeing Bureau and Office implementation of future actions to lower costs.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
FY 2026 President’s Budget supports this SO.	N/A	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					

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

**Deputy Assistant Secretary Administrative Services (DAS-AS):**

Responsive to	SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis				
Accountable	Office of Hearings and Appeals (OHA)				
Initiative					
Implement OHA Modernization Initiatives					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Streamline, expedite, and lower costs of hearings and appeals under OHA’s procedures.  OHA provides a low-cost forum for hearings and appeals, particularly for unrepresented parties.	43 CFR Part 4	(b) (5)			

Assistant Secretary – Policy, Management, and Budget 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					
Initiative					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Consider how to create employment opportunities for American workers, including drawing discouraged workers into the labor force.		(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					



(b) (5)

Additional Information: (b) (5)

- (b) (5)
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**Office of Natural Resources Revenue:** The Office of Natural Resources Revenue (ONRR) manages and ensures full payment of revenues owed for the development of the nation's energy and natural resources on the Outer Continental Shelf and onshore Federal and Indian lands. ONRR does not have direct or support responsibilities for action plans under this SO.

**The following PMB Divisions and Offices reviewed SO 3419 and determined that their areas of responsibility are outside the scope of this report:**

- Deputy Assistant Secretary Public Safety, Resource Protection, & Emergency Management
- Deputy Assistant Secretary Human Capital and Diversity; Chief Human Capital Officer
- Office of Chief Information Officer
- Office of Associate Chief Information Officer
- Office Of Facilities and Administrative Services
- Office of Diversity, Inclusion, and Civil Rights
- Bipartisan Inflation Law (BIL) and Inflation Reduction Act Program Management Office
- Great American Outdoor Act Program Management Office

## Assistant Secretary – Policy, Management, and Budget Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

**Summary:** The Office of the Assistant Secretary – Policy, Management and Budget (AS-PMB) provides overall policy direction, leadership, guidance, and assistance on a broad range of management and operational issues that directly affect the Interior Department’s ability to fulfill its mission. The AS-PMB serves in a number of statutorily designated positions including as the agency’s Chief Financial Officer, Chief Acquisition Officer, and Chief Performance Officer. SO 3422 directs AS-PMB to work with Bureaus and Offices to submit an action plan as directed by 3(b)(xxii) of EO 14153. The Office of Subsistence Management and the Budget Office provided actions plans. The Actions outlined below will be coordinated directly with the appropriate Bureaus and Offices.

### Deputy Assistant Secretary Policy, and Environmental Management

Responsive to	SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential	
Accountable	Office of Subsistence Management	
Initiative		
Sec. 6 Directive = AS-PMB, in coordination with all Bureau and Office Heads, will submit an action plan to the Secretary to immediately take the appropriate steps to execute the direction with respect to the agency actions in section 3(b)(xxii) of EO 14153.		
Milestones	Due Date	Measurable Metrics
(b) (5)		

(b) (5)



**Deputy Assistant Secretary Budget, Finance, Grants, & Acquisitions:**

Responsive to	SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential				
Accountable	Office of Budget (POB)				
Initiative					
Sec. 6 Directive = AS-PMB, in coordination with all Bureau and Office Heads, will submit an action plan to the Secretary to immediately take the appropriate steps to execute the direction with respect to the agency actions in section 3(b)(xxii) of EO 14153.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
FY 2026 President’s Budget supports this SO	N/A	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

**Title:** Assistant Secretary – Water and Science Action Plan for SO 3417 – Addressing the National Energy Emergency

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

The Office of the Assistant Secretary – Water and Science will utilize the Nexus of Energy and Water for Sustainability Research Development & Demonstration (NEWS RD&D) Office, mandated by Section 1010 of Energy Act of 2020 to develop a Strategic Plan to identify, coordinate and advance priorities under this, and other applicable Secretarial Orders related to hydroelectric energy development.

*U.S. Geological Survey*

The U.S. Geological Survey will use its existing non-emergency authorities to identify domestic energy and critical mineral resources and support other DOI Bureaus' permitting and leasing efforts.

*Bureau of Reclamation*

(b) (5)

*Central Utah Project Completion Act Office*

(b) (5)

Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

(b) (5)

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

*U.S. Geological Survey*

(b) (5)

*Bureau of Reclamation*

(b) (5)

*Central Utah Project Completion Act Office*

(b) (5)

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

- The actions presented in Water and Science Action Plan for SO 3418 – Unleashing American Energy also fulfill the response to this Secretarial Order.

Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

- Milestones listed under "Identify domestic mineral resources, including but not limited to on Federal lands" are (b) (5)

Responsive to	<a href="#">SO 3417 – Addressing the National Energy Emergency</a>				
Accountable	U.S. Geological Survey				
Initiative					
<b>Sec. 2.a.</b> All Bureaus and Offices 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.					
<b>Sec. 2.b.</b> All 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.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify legal authorities to facilitate identification of domestic energy resources and critical minerals	Various - see report due 2/21/25 below.				(b) (5)
Milestones	Due Date	Measurable Metrics			

(b) (5)

Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify domestic mineral resources including, but not limited to, on Federal lands.	Various - see report due 2/21/25 above	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					



Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

(b) (5)

Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

(b) (5)

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify domestic energy resources including, but not limited to Federal lands.	Various - see report above	(b) (5)			
Milestones	Due Date	Measurable Metrics			

(b) (5)



Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

(b) (5)

Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

(b) (5)

Responsive to	<a href="#">SO 3417 – Addressing the National Energy Emergency</a>				
Accountable	Bureau of Reclamation				
Initiative					
<b>Sec. 2.a.</b> All Bureaus and Offices 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.					
<b>Sec.2.b.</b> All 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.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Use of emergency authorities	Various	(b) (5)			

Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

Milestones	Due Date	Measurable Metrics
(b)	(5)	

Assistant Secretary – Water and Science  
Action Plan for SO 3417 – Addressing the National Energy Emergency

Responsive to	SO 3417 – Addressing the National Energy Emergency				
Accountable	Central Utah Project Completion Act Office				
Initiative					
Sec. 2.a. All Bureaus and Offices 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.					
Sec.2.b. All 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.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Development of hydropower (b) (5)	PL 102-575; Townsite and Power Development Act of 1906;	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

**Title:** Assistant Secretary – Water and Science Action Plan for SO 3418 – Unleashing American Energy

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

The Office of the Assistant Secretary – Water and Science will utilize the Nexus of Energy and Water for Sustainability Research Development & Demonstration (NEWS RD&D) Office, mandated by Section 1010 of Energy Act of 2020 to develop a Strategic Plan to identify, coordinate and advance priorities under this, and other applicable Secretarial Orders related to hydroelectric energy development.

*U.S. Geological Survey*

The U.S. Geological Survey will identify domestic energy and critical mineral resources and support other DOI Bureaus' permitting and leasing efforts.

*Bureau of Reclamation*

(b) (5)

*Central Utah Project Completion Act Office*

(b) (5)

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

*U.S. Geological Survey*

(b) (5)

Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

(b) (5)

*Bureau of Reclamation*

(b) (5)

*Central Utah Project Completion Act Office*

(b) (5)

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

(b) (5)



Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

(b) (5)

Responsive to	<a href="#">SO 3418 – Unleashing American Energy</a>				
Accountable	U.S. Geological Survey				
Initiative					
Sec. 3.g. Ensuring that no Federal funding is employed in a manner contrary to the principles set out above, unless required by law					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Review Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA) funding to determine whether a pause in disbursement of IIJA and IRA funds set forth in M-25-11 conflicts with the direction set forth in EO 14154.	OMB Memo M-25-11 – The White House - January 21, 2025 EO 14154 - Unleashing American Energy	(b) (5)			



Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

Milestones	Due Date	Measurable Metrics
(b) (5)		
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 – see bulleted list.		

Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Earth Mapping Resources Initiative (Earth MRI): Prioritize efforts to accelerate the detailed geological mapping of the United States, with a focus on locating previously unknown deposits of critical minerals.	Infrastructure Investment and Jobs Act, (P.L. 117-58, enacted 11/15/2021) Sec. 40201. Earth MRI and Sec. 40203 National Geologic and Geophysical Data Preservation Program	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

(b) (5)

Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

(b) (5)

**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 – see bulleted list.

Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Update the U.S. Geological Survey's list of critical minerals including the potential to include uranium	Energy Act of 2020, Section 7002 Mineral Security (P.L. 116-260, enacted 12/27/2020)	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

(b) (5)



Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

Initiative					
<b>Sec. 4.c.</b> USGS will work with the BLM to develop standardized resource data, analyses, and tools that BLM can use to accelerate the planning and permitting cycle for energy and mineral resource development projects. This work supports the directives to take actions that prioritize reducing barriers to the use of Federal lands for energy development, consistent with the principle of multiple use; and actions to implement new and amended policies and procedures to increase the efficiency in the Bureau of Land Management's adjudication of applications for permits to drill.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Increase domestic energy production, reduce barriers to use of Federal lands	Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.; 43 U.S.C. 173)  National Environmental Policy Act of 1969 (42 U.S.C. 4331) .	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Bureau of Reclamation				
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 in section 3.					
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) – see bulleted list.					
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 – see bulleted list.					
Sec. 4.d. In addition to the review described in subparagraph (a), (b), and (c) above, the Assistant Secretary -Policy, Management and Budget is hereby directed to include in their action plan a review that includes, but is not limited to, their processes, policies, and programs for issuing grants, loans, contracts, or any other financial disbursements of all appropriated funds from the Inflation Reduction Act of 2022 (Public Law 117-169) and the Infrastructure Investment and Jobs Act (Public Law 117-58) for consistency with the policy in section 3.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Increase Energy Generation	Reclamation Act of 1902	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					



(b) (5)

Assistant Secretary – Water and Science  
Action Plan for SO 3418 – Unleashing American Energy

Responsive to	SO 3418 – Unleashing American Energy				
Accountable	Central Utah Project Completion Act Office				
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 in section 3.					
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) – see bulleted list.					
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 – see bulleted list.					
Sec. 4.d. In addition to the review described in subparagraph (a), (b), and (c) above, the Assistant Secretary -Policy, Management and Budget is hereby directed to include in their action plan a review that includes, but is not limited to, their processes, policies, and programs for issuing grants, loans, contracts, or any other financial disbursements of all appropriated funds from the Inflation Reduction Act of 2022 (Public Law 117-169) and the Infrastructure Investment and Jobs Act (Public Law 117-58) for consistency with the policy in section 3.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Terminate actions for revoked EOs; Suspend inconsistent actions	PL 102-575	(b) (5)			
Milestones	Due Date	Measurable Metrics			
(b) (5)					

**Title:** Assistant Secretary – Water and Science 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.

*U.S. Geological Survey*

The USGS provides science and data to support and inform decision making by other DOI bureaus and other Federal agencies related to supply chains, energy, and minerals.

*Bureau of Reclamation*

(b) (5)

*Central Utah Project Completion Act Office*

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

The CUPCA Office does not independently promulgate regulations. (b) (5)

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

*U.S. Geological Survey*

N/A

*Bureau of Reclamation*

(b) (5)

*Central Utah Project Completion Act Office*

(b) (5)

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

(b) (5)

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

- The attachment *Bureau of Reclamation Hydropower Value and Opportunities* (b) (5)

Responsive to	<a href="#">SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</a>				
Accountable	U.S. Geological Survey				
Initiative					
Sec. 5.b. The heads of Bureaus and Offices are responsible for conducting the review required in section 4 and reporting the results. They will also be responsible for ensuring completion of any implementation actions, including modifications to Bureaus and Offices policies, procedures, or practices that are inconsistent with the goals of the Cost-of-Living Memo. See Presidential Memo of January 20, 2025.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Ensure consistency of USGS policies, procedures, and practices with the Presidential Memo.	Energy Act of 2020	(b) (5)			

Milestones	Due Date	Measurable Metrics
(b)		(5)



(b) (5)

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

<b>Responsive to</b>	<a href="#">SO 3419 – Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis</a>				
<b>Accountable</b>	<b>Bureau of Reclamation</b>				
<b>Initiative</b>					
<p><b>Sec. 5.b.</b> The heads of Bureaus and Offices are responsible for conducting the review required in section 4 and reporting the results. They will also be responsible for ensuring completion of any implementation actions, including modifications to Bureaus and Offices policies, procedures, or practices that are inconsistent with the goals of the Cost-of-Living Memo. See Presidential Memo of January 20, 2025.</p>					
<b>Policy goal(s)</b>	<b>Legal Authority</b>	<b>Recommendation</b>	<b>Barriers to Overcome</b>	<b>Metrics for Success</b>	<b>Final Due Date</b>
Identify activities that increase costs.	None identified	(b) (5)			
<b>Milestones</b>		<b>Due Date</b>	<b>Measurable Metrics</b>		
(b) (5)					

(b) (5)

Assistant Secretary – Water and Science  
 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	Central Utah Project Completion Act Office				
Initiative					
Sec. 5.b. The heads of Bureaus and Offices are responsible for conducting the review required in section 4 and reporting the results. They will also be responsible for ensuring completion of any implementation actions, including modifications to Bureaus and Offices policies, procedures, or practices that are inconsistent with the goals of the Cost-of-Living Memo. See Presidential Memo of January 20, 2025.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
Identify activities that increase costs.	None identified	(b) (5)			
Milestones		Due Date	Measurable Metrics		
(b) (5)					

**Title:** Assistant Secretary – Water and Science Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

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

The Assistant Secretary – Water and Science bureaus and offices do not have direct equities or authorities in Alaska, however, the U.S. Geological Survey collects data and completed assessment for resources throughout the country, including Alaska. Notable assessments are listed below.

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

N/A

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

N/A

Responsive to	<a href="#">SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential</a>				
Accountable	U.S. Geological Survey				
Initiative					
Sec. 6. Identify necessary and appropriate steps to execute the direction regarding all agency actions in EO 14153.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
N/A	N/A	N/A	N/A	N/A	N/A
Milestones		Due Date	Measurable Metrics		
(b) (5)					



Assistant Secretary – Water and Science Action Plan for SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential

Responsive to	SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential				
Accountable	Bureau of Reclamation				
Initiative					
Sec. 6. Identify necessary and appropriate steps to execute the direction regarding all agency actions in EO 14153.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
n/a	n/a	n/a	n/a	n/a	n/a
Milestones		Due Date	Measurable Metrics		
(b) (5)					

Responsive to	<a href="#">SO 3422 – Unleashing Alaska’s Extraordinary Resource Potential</a>				
Accountable	Central Utah Project Completion Act Office				
Initiative					
Sec. 6. Identify necessary and appropriate steps to execute the direction regarding all agency actions in EO 14153.					
Policy goal(s)	Legal Authority	Recommendation	Barriers to Overcome	Metrics for Success	Final Due Date
N/A	N/A	N/A	N/A	N/A	N/A
Milestones		Due Date	Measurable Metrics		
N/A		N/A	N/A		

# Reclamation Hydropower Value and Opportunities

## Executive Summary

(b) (5)

## Background

(b) (5)

## Existing Facilities Analysis

### Capacity Factors by Plant

(b) (5)

### Ancillary Service Benefits

(b) (5)

(b) (5)

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■ (b) (5)

## Enhancement Opportunities

### Generation and Operational Efficiencies

(b) (5)

### Enhance Hydropower Resources

(b) (5)

(b) (5)

**Table 1.** Recently completed hydropower generation capacity and efficiency projects.

Region	Facility	Activity	Completion Date	Incremental MW/Efficiency <sup>1</sup>
(b) (5)				



## Upgrade Priorities

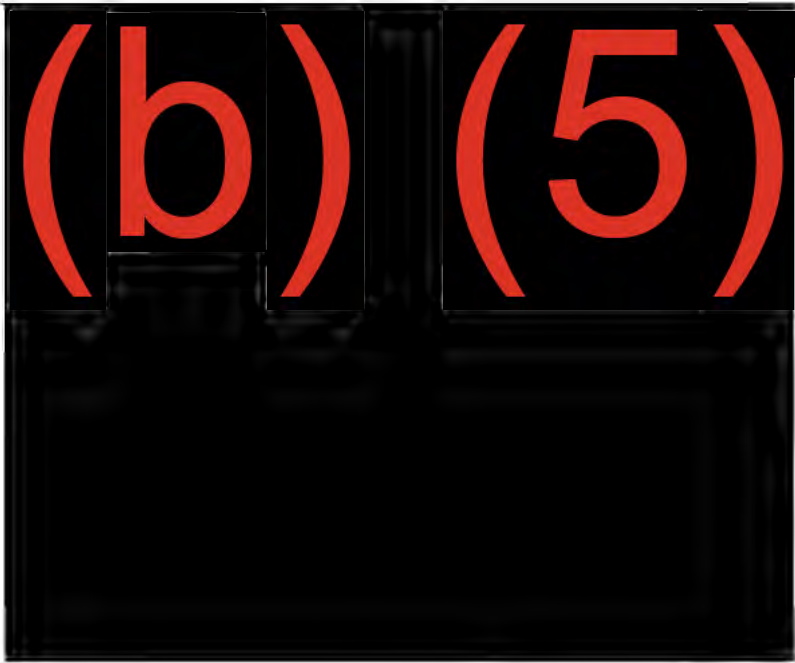
(b) (5) [REDACTED]

**Table 2.** Reclamation hydropower system upgrade priorities.

Region	Priority Upgrade
(b)	(5)

(b) (5) [REDACTED]

(b) (5)



#### LOPP Proposals & Opportunities

(b) (5)



(b) (5)



(b) (5)

## Pumped Storage Proposals & Opportunities

(b) (5)

(b) (5)

### Next Steps

(b) (5)