



# Public Employees for Environmental Responsibility

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March 30, 2015

Ms. Mary Kendall  
Deputy Inspector General  
U.S. Department of Interior  
1849 C Street, NW  
Mail Stop 4428  
Washington, DC 20240

## **Re: Request for Audit of BLM Abandoned Oil & Gas Well Reclamation Compliance**

Dear Ms. Kendall:

I am writing on behalf of Public Employees for Environmental Responsibility (PEER) to request that your office review what appears to be a serious and systemic violation of federal regulation with severe environmental consequences.

By federal regulation (43 CFR 3162.3-4 Well Abandonment, Onshore Order and APD approval), once the lease owner and well operator knows that an oil or gas well under Interior Department jurisdiction is no longer producing in paying quantities, the well is to be plugged, facilities and equipment removed, disturbed sites re-contoured, stored top soil administered to the area, and the site re-vegetated to near natural vegetation to include the well site, access road, and other disturbed areas associated with the well.

The Bureau of Land Management (BLM) instructs its employees (IM No. 2012 -181) to conduct an idle-well review and to enter data into the Automated Fluid Minerals Support System to document wells past seven years of non-production. However, a review of records from BLM Utah Field Offices (attached) indicates that hundreds of wells more than 10 years in non-production remain unplugged and the sites remain un-reclaimed.

The failure to return non-productive well sites and other associated energy land disturbance activities to near natural surface conditions has significant adverse environmental consequences. Unplugged wells are potential sources of potential spills as well as air, soil, and water contamination. They also release volatile hydrocarbons which are greenhouse gases. In addition, site reclamation prevents invasive weeds and fugitive dust, provides new forage for wildlife and livestock, and reduces soil erosion.

Analysis of the records PEER obtained under the Freedom of Information Act showed that the BLM Utah Field Offices suffers from a chronic failure to ensure the plugging and reclamation of idle well sites.

We believe that these records are representative of the non-performance on this issue in other BLM petroleum-active states (Colorado, New Mexico, and Wyoming), thus we are asking your office to review reclamation records for those states to verify this assumption.

Please let me know if you would like additional information or clarification concerning the scope of or justification for this request.

Sincerely,

Laura Dumais, Staff Counsel  
Public Employees for Environmental Responsibility