

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L left a comment in "DRAFT Report Combined 050221"
Date: Sunday, May 2, 2021 6:40:05 PM
Attachments: [e7ab6cda-3ba3-416b-9ca8-2bc18994b099](#)
[aed7ebed-6244-4d66-a2b3-6b56b5e076a2](#)
[324a1625-43f6-434c-9318-7fb8386ce81c](#)
[ede4bb69-e7a8-44e2-9cfb-cf36f695c2ba](#)



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Culver, Nada L added a comment

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From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: Report update!
Date: Sunday, May 2, 2021 6:24:35 PM

Got it. Ended up reviewing some other things first, but will be careful!

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 2, 2021 5:50 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: RE: Report update!

Great – remember to use the combined doc link. Nada and I are in there!

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Sunday, May 2, 2021 5:30 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Report update!

Yes, all good. Looking at it all now. Thanks!

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 2, 2021 10:01 AM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: FW: Report update!

Just FYI below. Please confirm that is on track with your thinking!

Also, Marissa is going to clean up the offshore doc, then I will combine into one doc. (b) (5)

And go from there!

Alex

From: Sanchez, Alexandra L
Sent: Sunday, May 2, 2021 9:54 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: Report update!

Good Morning, Nada!

Attached is the offshore draft. Can you take a quick look? Laura liked how the recs were at the end of each section. Exact formatting tbd but if we could get 2-3 sentences at the end of each issue like this, I think that will work. I put in the placeholders and we already have some in there.

The shared doc is ready for your review. I'm around if you need me! Thank you!

Alex

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L left a comment in "DRAFT Report Combined 050221"
Date: Sunday, May 2, 2021 5:50:10 PM
Attachments: [f63fbc7d-f8fc-4357-b16c-64c212dc4302](#)
[416eeeba-d739-41e0-876e-0dc655f3b7c7](#)
[f045a0c9-8d10-422b-bef0-29ede78dfcb7](#)
[ca080e73-fe3f-409e-83ce-89595e87d053](#)



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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L left a comment in "DRAFT Report Combined 050221"
Date: Sunday, May 2, 2021 5:36:00 PM
Attachments: [f3aca677-ac4a-4673-be74-ca5b5681fa326026d02d-0e2c-455b-bfc2-b8bd81d2ebae](#)
[ca007dae-2808-45ce-8efa-76ebb7779a702951622f-7deb-4813-baf0-1bd14513f98a](#)
[01cd427c-2023-4c2c-9002-e5d3a533159d06f06218-1684-45c3-992e-6adb5b055166](#)
[67e01683-0cf5-4ca0-9dbc-d42043d11877b47e0d4b-9819-4451-9f7c-ddee853cfd7d](#)



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Culver, Nada L left a comment

3 more replies



Sanchez, Alexandra L left a comment



Sanchez, Alexandra L left a comment



Culver, Nada L replied

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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L left a comment in "DRAFT Report Combined 050221"
Date: Sunday, May 2, 2021 5:05:23 PM
Attachments: [532c5bd7-beed-4b61-9388-702de52e2dd85c2e04ec-da2d-44df-b041-c33da907eb3f5aba49d8-8ca3-4693-bbbd-332d4f07da088ef50f20-f87d-476b-a425-0e3373786ec048fcbbb-d85d-4c56-865b-ad6dc5ffaf4876e5a7ab-dfa9-4c05-8ab6-6001d01681bb](#)



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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L left a comment in "DRAFT Report Combined 050221"
Date: Sunday, May 2, 2021 4:35:04 PM
Attachments: [67d6a3bb-1322-406d-9c94-07ad5e28556c91ac2fda-3a97-4c38-8e4c-e74ab542338c122176bc-9164-4b35-a94f-02279c3621e0d272f05b-305a-47f5-8816-0d11baff57500656cea7-d894-413a-8d9e-9fa4e6a613923b6b1a3b-0dba-40a6-a539-1184cea6710366cd7bd1-ab5a-49cd-9561-93ed6dadd024e1888379-a84a-4946-8c58-413127d451d1](#)



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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L left a comment in "DRAFT Report Combined 050221"
Date: Sunday, May 2, 2021 4:10:15 PM
Attachments: [c1317a8a-a201-44a5-bf9c-a8465780f425](#)
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[93b0f486-552b-4722-8813-c1750a02b361](#)
[1bc78e1d-3d06-4406-ba9a-e0ba08490e8e](#)
[b3914eeb-7e4f-4fd0-a32b-67ad5ab9f22b](#)



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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: Culver, Nada L left a comment in "DRAFT Report Combined 050221"
Date: Sunday, May 2, 2021 3:42:12 PM
Attachments: [9b66dd6e-bf60-447f-925e-160ec1aea49f6a2b8219-dbe3-4558-a3e5-dbbfbd9eaf0bb7966f2-a1f3-4216-b85f-ea3eb12471a9bf9b73ca-49e0-4242-ab13-7aa32a58b00c](#)



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Culver, Nada L added a comment

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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: Report update!
Date: Sunday, May 2, 2021 3:36:47 PM

I'm still catching up on other assorted email drama... but yes! Thanks for so much hard work. I'm glad we both got some sleep – needed even for the night owls.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 2, 2021 1:36 PM
To: Culver, Nada L <nculver@blm.gov>
Subject: RE: Report update!

Yes indeed!
Thank you! I see you in the doc

From: Culver, Nada L <nculver@blm.gov>
Sent: Sunday, May 2, 2021 3:33 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: Report update!

So these are all combined into the one document now, right? I can just look at that? Digging in!

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 2, 2021 9:35 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: RE: Report update!

No problem at all – recharge as necessary! And I'm sorry about your Saturday. I'm merrily? plugging away in the doc. I was able to chill yesterday evening and get a good night's sleep. We are making progress!

From: Culver, Nada L <nculver@blm.gov>

Sent: Sunday, May 2, 2021 11:32 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Report update!

Got it. I just need a couple more hours of sanity and then can dive in. Yesterday ended up with a few things so I'm trying to make sure I'm not too cranky when I get to work today. ;)

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From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 2, 2021 9:01:32 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: RE: Report update!

I think if you can just look to see how they did it, not review review.
Thank you!

From: Culver, Nada L <nculver@blm.gov>
Sent: Sunday, May 2, 2021 10:56 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Report update!

Okay. So you want me to look at both?

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From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 2, 2021 7:53:43 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: Report update!

Good Morning, Nada!

Attached is the offshore draft. Can you take a quick look? Laura liked how the recs were at the end of each section. Exact formatting tbd but if we could get 2-3 sentences at the end of each issue like this, I think that will work. I put in the placeholders and we already have some in there.

The shared doc is ready for your review. I'm around if you need me! Thank you!

Alex

From: [Culver, Nada L](#)
To: [Jackson, Danna R](#); [Sanchez, Alexandra L](#)
Cc: [Daniel-Davis, Laura E](#)
Subject: RE: Environmental Justice component in BLM oil and gas plan
Date: Sunday, May 2, 2021 3:35:55 PM

I agree, Danna, (b) (5)

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Jackson, Danna R <djackson@blm.gov>
Sent: Sunday, May 2, 2021 10:51 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>
Cc: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: Re: Environmental Justice component in BLM oil and gas plan

So interesting! I have not been following this at all. (b) (5)

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From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Sunday, May 2, 2021 9:46:37 AM
To: Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>
Cc: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: FW: Environmental Justice component in BLM oil and gas plan

Would love thoughts (b) (5)

From: Moran, Jill C <jcmoran@blm.gov>
Sent: Thursday, April 22, 2021 3:35 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Macdonald, Cara Lee <cara_macdonald@ios.doi.gov>
Subject: Environmental Justice component in BLM oil and gas plan

Hi Alex,

I wanted to share some history on one of the BLM's environmental impact statements that relates to both oil and gas development and the safety of American Indian women and their communities. Given the ongoing review of the BLM's oil and gas program and the Secretary's

commitment to addressing violence towards American Indian women, I thought it would be timely to share this with you as it may be of interest.

In February 2020, BLM-Wyoming published the Final EIS for the **Moneta Divide Natural Gas and Oil Development Project**. The Final EIS included language that responded to concerns raised in comments to the Draft EIS (I believe from the Western Watersheds Project) and aimed to further protection for tribes, particularly women, from the effects of oil and gas operations moving into areas near reservations. This is the first EIS that I am aware of that has included such language. It was not well received by the last administration and was eventually removed in the Record of Decision.

In Chapter 3 (Affected Environment), p. 3-128:

During public review of the Draft EIS, tribal and non-tribal members of the public expressed concerns that the safety of tribal members could be disproportionately affected by the large influx of non-local oil and gas workers, and that some members of the tribes could be more vulnerable to victimization due to their proximity to the workforce facility the Companies' have proposed to construct. While development in the Production area would stimulate greater economic opportunities for local residents, including environmental justice communities, rapid population growth stemming from the influx of oil and gas workers has the potential to adversely impact many qualities of life factors in surrounding communities. Some adverse impacts to quality of life factors, like crime, are likely to disproportionately affect tribal communities. The correlation between the influx of non-local oil and gas workers and significant increases in property and violent crimes is well documented (Archbold 2013; Carrington et al. 2010; Gourley and Madonia 2018; Perry 2007; Petkova et al. 2009; Ruddell and Thomas 2012; Ruddell et al. 2014; Finn et al. 2017). The Bureau of Justice Statistics has found that Native Americans experience violent crimes at rates far greater than the general population (Bureau of Justice Statistics 2004). Based on the studies cited above and statistics from the Bureau of Justice Statistics, it is possible that tribal members, especially women, may experience increased violent crime due to the influx of non-local oil and gas workers. However, there is no information available at this time to indicate that this would occur as a result of development within the Moneta Divide Project Area.

Chapter 4 (Environmental Consequences), p. 4-297, adds:

Although development in the Production area would stimulate greater economic opportunities for local residents, including environmental justice communities, rapid population growth stemming from the influx of oil and gas workers has the potential to adversely impact many quality of life factors in surrounding communities (Section 4.15.3.2, Alternative 2). Some adverse impacts to quality of life factors, like crime, are likely to disproportionately affect tribal communities. As discussed in Section 3.16.5, Differential Patterns of Consumption and Exposure, Native Americans experience violent crime at rates much higher than the general public, Native American women are one of the most vulnerable

groups in the country, and crimes against Native Americans are often perpetrated by non-Native Americans. Because Native Americans have a history of being disproportionately affected by crime, it can be assumed that rising crime rates would also have a disproportionately adverse impact on members of Eastern Shoshone and Northern Arapaho. Of tribal members, women would be most likely to disproportionately experience violent crime

The document then proposes the following mitigation measure *Chapter 4, p. 4-299*:

The BLM has developed a mitigation measure to address the disproportionate impact on tribal populations by the influx of oil and gas workers into the area. The BLM did not identify a need for any other mitigation measures for environmental justice at this programmatic level of analysis. The BLM may develop and apply mitigation measures during subsequent site-specific NEPA reviews based on needs identified at that time.

• EJ-1 – The Companies will be encouraged to adopt and incorporate best practices from The United Nations Guiding Principles on Business and Human Rights (United Nations 2011) as part of their worker safety and environmental training program implemented before the start of construction. Best practices from the UN Guiding Principles include employee screening and background checks, law enforcement coordination, employee training, internal policing, and victim services. Adoption and implementation of best practices will help avoid impacts to Native American communities during project development and operation.

When the Final EIS came out, E&E news picked up on it (see attached article) and this is how the former Secretary became aware of it. I can share the details with you, but as I mentioned above, months later the mitigation measure was rejected in the signed Record of Decision. Attached is the redline of the ROD - you can see the change there on pages 23-24.

Let me know if you'd like to chat about this sometime - I can also provide the relevant links to the documents if you'd rather just look them over.

Thanks,
Jill

--

Jill Moran
Senior Policy Analyst
Office of the Assistant Secretary - Land and Minerals Management
U.S. Department of the Interior

202.208.4114

From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: Response to OIG royalty relief NPFR
Date: Friday, April 30, 2021 4:49:37 PM

Thank you!

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, April 30, 2021 2:32 PM
To: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: FW: Response to OIG royalty relief NPFR

FYI

From: Mabry, Scott <Scott.Mabry@bsee.gov>
Sent: Monday, April 12, 2021 5:43 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Macdonald, Cara Lee <cara_macdonald@ios.doi.gov>
Subject: FW: Response to OIG royalty relief NPFR

Ms. Daniel-Davis,

Attached are our initial response for the notice of potential findings provided by the OIG, and related to special case royalty relief. The potential findings are:

- BSEE Did Not Have Policy for Special Case Royalty Relief (SCRR) Option 1
- BSEE Did Not Formalize Application Evaluation Procedures for SCRR Option 1
- No Formal Training on New Option 1 Program

As you can see in our response, BSEE generally agrees with the recommendations, but we are requesting some edits as well as clarification in a couple of areas. Our response is due back to the OIG this Thursday. I have also included the incoming notice. Please let us know if you have any concerns with the draft response. If you would like us to enter into DTS we can do that as well.

As a note, once we receive the final report, we will develop the corrective action plan, and track that to completion.

Please let me know if you have any questions.

Thank You

Scott

From: Madden, Molly <Molly.Madden@bsee.gov>

Sent: Monday, April 12, 2021 5:04 PM

To: Mabry, Scott <Scott.Mabry@bsee.gov>

Cc: Williams, Chanielle P <Chanielle.Williams@bsee.gov>; Luu, Linh <Linh.Luu@bsee.gov>; Karl, Kevin <Kevin.Karl@bsee.gov>

Subject: Response to OIG royalty relief NPFR

Hi Scott,

Attached is the proposed response to the OIG's Notice of Proposed Findings and Recommendations from its inspection of BSEE's royalty relief program (also attached). Chanielle coordinated input from the regions and Kevin has concurred with this draft. Please let us know if you have any concerns with this draft. We would like to enter it into DTS for your and ASLM's surname. Let us know, though, if you don't think this needs to go into DTS for ASLM.

Thanks,

Molly

--

Molly Madden

Chief - Office of Policy and Analysis
Bureau of Safety and Environmental Enforcement

U.S. Department of the Interior

1849 C Street, NW, MS-5438

Washington, DC 20240

Molly.Madden@bsee.gov

office: 202-219-7271

cell: 202-374-3703

From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: Fitness to Operate
Date: Friday, April 30, 2021 4:35:19 PM

Yes, (b) (5)

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, April 30, 2021 4:17 PM
To: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: RE: Fitness to Operate

Ok, thanks! (b) (5)

, but we can discuss further.

Alex

From: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Sent: Friday, April 30, 2021 3:33 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Re: Fitness to Operate

Thanks, I have those. (b) (5)

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, April 30, 2021 2:45 PM
To: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Subject: Fitness to Operate

Additional info.

From: [Knodel, Marissa S](#)
To: [Sanchez, Alexandra L](#); [Lefton, Amanda B](#); [Culver, Nada L](#); [Jackson, Danna R](#)
Cc: [Diera, Alexx A](#)
Subject: Re: O and G reforms
Date: Friday, April 16, 2021 6:56:29 PM

Great, adding BOEM's recommendations now!

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, April 16, 2021 6:55 PM
To: Lefton, Amanda B <Amanda.Lefton@boem.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>
Cc: Diera, Alexx A <adiera@blm.gov>
Subject: Re: O and G reforms

Same. Thank you!

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From: Lefton, Amanda B <Amanda.Lefton@boem.gov>
Sent: Friday, April 16, 2021 6:55:33 PM
To: Knodel, Marissa S <Marissa.Knodel@boem.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>
Cc: Diera, Alexx A <adiera@blm.gov>
Subject: RE: O and G reforms

Good with that

From: Knodel, Marissa S <Marissa.Knodel@boem.gov>
Sent: Friday, April 16, 2021 6:55 PM
To: Lefton, Amanda B <Amanda.Lefton@boem.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>
Cc: Diera, Alexx A <adiera@blm.gov>
Subject: Re: O and G reforms

Thanks! Should I add to her document?

Marissa Knodel
Advisor, Bureau of Ocean Energy Management
202.538.2415
Marissa.Knodel@boem.gov

From: Lefton, Amanda B <Amanda.Lefton@boem.gov>
Sent: Friday, April 16, 2021 6:53 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>
Cc: Diera, Alexx A <adiera@blm.gov>
Subject: RE: O and G reforms

Marissa—I think you did a nice job narrowing the list for sanchez

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Friday, April 16, 2021 10:46 AM
To: Lefton, Amanda B <Amanda.Lefton@boem.gov>; Knodel, Marissa S <Marissa.Knodel@boem.gov>; Culver, Nada L <nculver@blm.gov>; Jackson, Danna R <djackson@blm.gov>
Cc: Diera, Alexx A <adiera@blm.gov>
Subject: O and G reforms

Friends,

I need help! Linked is the list of proposed reforms that we as a team have put together that I pulled from the report outline, and the onshore section of the report. Also it includes some recs found elsewhere (you'll see what I mean) that we need to figure out if we'd like to incorporate into our reform plan. Also waiting on BOEM additions, as you know and are on top of!

Can you help me organize, and write these up for the meeting on Monday afternoon with the solicitors? Laura would like them put together in a way so we can productively discuss how we can move forward on them, either administratively or through regs. And I need your expertise and guidance there. Happy to jump on a call, or we can bring up at the 11am.

Thanks, as always!
Alex

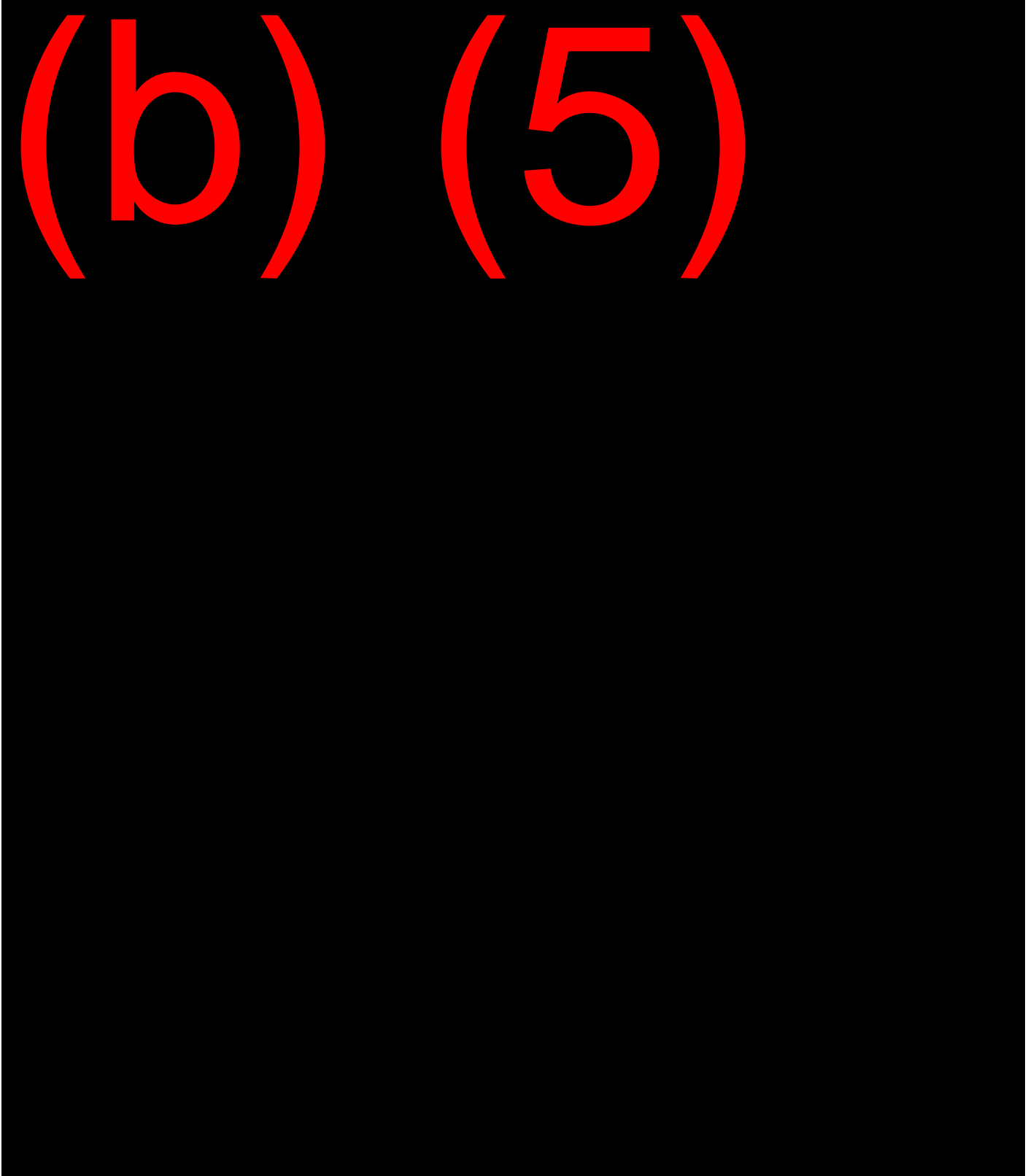
[DRAFT Proposed Reforms.docx](#)

Alexandra Sanchez (she/her)
Special Assistant
Office of the Assistant Secretary

Land and Minerals Management
U.S. Department of the Interior

DRAFT PROPOSED REFORMS

OFFSHORE



(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

ONSHORE

(b) (5)

(b) (5)

(b) (5)