

**OIL AND GAS
ROYALTY RELIEF
RESEARCH BOOK**

ACCOUNTABLE.US

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DISCLAIMER: *Corporations and companies identified throughout this document are BLM lessees. In some cases, a subsidiary or separate company may have operating rights for a given lease. BLM's LR2000 database does not always specify if a lease has a separate lessee and operator. In cases where the operator is separate, it is possible that the operator applied for and received a royalty rate or suspension.*

KEY FINDINGS

BLM Offered Royalty Rate Reductions And Lease Suspensions During The Covid-19 Pandemic. In response to the Covid-19 pandemic, BLM unilaterally offered a bailout to public lands oil and gas corporations through reduced royalty rates and lease suspensions on public lands oil and gas leases.

- BLM Approved Over 550 Separate Cases Of Royalty Rate, Encompassing Nearly Half A Million Acres Of Public Land Across Five States.
- BLM Approved Over 420 Lease Suspensions On Nearly 340,000 Acres Of Public Land Across Seven States.
- Over 110 Oil Corporations Took Advantage Of The Program.

Companies That Received Royalty Rate Reductions And Lease Suspensions Double Dipped From Covid-19 Bailout Programs

- Corporations That Received Public Lands Oil & Gas Lease Bailouts Also Got \$25.4 Million In Paycheck Protection Program Loans.
- Companies That Received Public Lands Oil & Gas Lease Bailouts Also Got Nearly \$324 Million In CARES Act Tax Benefits.

Companies That Received The Most Royalty Rate Reductions Have Close Relationships In Donald Trump's Interior Department.

- One Of The Largest Royalty Relief Beneficiaries, Samson Resources, Is A Former Client Of Interior Secretary David Bernhardt.
 - Samson Got 54 Separate Lease Suspensions Covering Over 20,000 Acres Of Public Land.
- 72 Percent Of Approved Royalty Rate Reductions Were In Wyoming, Whose Petroleum Association Was Formerly Represented By BLM Acting Director William Perry Pendley.
- The Petroleum Association Of Wyoming Bragged That It Was "Working With" BLM To "Ease The Burden" Of Processing Royalty Relief Applications.

- Many Of The Biggest Beneficiaries Of Royalty Reduction Nationwide Are Members Of The Petroleum Association Of Wyoming.

Companies That Received Royalty Rate Reductions Have A History Of Past Royalty Violations And Major Environmental Violations

- Corporations That Got Royalty Relief Or Lease Suspensions Have Racked Up Nearly \$16 Billion In Environmental And Other Penalties.
- Six Leaseholders On Leases Receiving Royalty Relief Or Lease Suspensions Have A History Of Being Assessed Penalties For Royalty Violations.

ISSUE BACKGROUND

Public Land Drillers Were Given Reduced Royalties And Suspended Leases By The Bureau Of Land Management

The Trump Administration Is Offering A Backdoor Bailout To Oil Companies By Granting Lease Suspensions And Steeply Discounted Royalty Rates On Hundreds Of Thousands Of Acres Of Public Land

BLM Put Out An Offer To Public Lands Drillers For Reduced Royalties Or Suspended Leases During The Coronavirus Pandemic...

BLM Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. “In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers.” [E&E, [05/20/20](#)]

BLM Advised Public Lands Oil And Gas Drillers On How To Apply For Reduced Royalty Rates Or Lease Suspensions During The COVID-19 Pandemic. “The BLM has authority to grant royalty relief when it is in the interest of conservation to do so or would encourage the greatest ultimate recovery of oil and gas. Without royalty relief, the abandonment of oil and gas wells would reduce the ultimate recovery of petroleum resources from Federal leases and result in the loss of the associated future royalty revenue to the U.S. Treasury. To avoid these well abandonments, operators may show that it would be in the interest of conservation and encourage the greatest ultimate recovery of oil and gas to reduce royalties for leases that would otherwise be prematurely abandoned due to the COVID-19 pandemic.” [BLM Royalty Relief Guidance, [04/21/20](#)]

- **BLM Didn't Say How Much It Is Willing To Reduce Companies' Royalties By, But Suggested It Would Be A Substantial Amount That Will Last One Year.** “The MLA allows BLM, for the purpose of encouraging the greatest ultimate recovery of oil and gas and in the conservation of natural resources, to “waive, suspend, or reduce” the royalty rate on a federal oil and gas lease when “necessary . . . to promote development” or when the lease “cannot be successfully operated” under its current terms. 30 U.S.C. § 209. BLM’s regulations specify the requirements of an application for royalty relief. 43 C.F.R.

§ 3103.4-1. [...] The Interim Royalty Relief Guidance does not specify a particular rate; however, it uses the example of a reduction from 12.5 percent to 0.5 percent. This example suggests that BLM will consider requests to significantly reduce royalty rates. [...] Approved temporary royalty rate reductions will terminate one year from BLM's approval of the application." [Davis Graham & Stubbs, [04/23/20](#)]

- **BLM's Offer To Suspend Leases Will Postpone Any "Operational Obligation" The Company Has With That Lease.** "BLM's Interim Guidance for Lease Suspension Requests During the COVID-19 National Emergency ("Interim Suspension Guidance") outlines how federal lessees may obtain suspensions of operations or production under section 17 of the Mineral Leasing Act (MLA) because of the COVID-19 pandemic. [...] A suspension of operations postpones the operational obligation of a lease and temporarily tolls the running of the lease term to prevent the lease from expiring during the suspension. A suspension of production postpones the production obligation of the lease to prevent it from expiring during the suspension." [Davis Graham & Stubbs, [04/23/20](#)]
 - **"A suspension of operations and production tolls the running of the lease term, prevents the lease from expiring during the suspension, and tolls payment of rentals, but it also bars both operations and production."** [BLM, accessed [05/18/20](#)]

BLM Laxed Its Requirements For Royalty Relief Applications In June. "The BLM quietly changed its application guidance in June, by which time US Realm's leases had already received reductions. The new criteria offered even looser restrictions on eligibility, no longer requiring that applicants prove that a lease could be profitable with a reduction." [*Buffalo Bulletin*, [09/30/20](#)]

... As States Are Left To Deal With The Loss Of Vital Revenue

Energy Royalties Are "An Integral Component Of Many Western States' Budgets." "While a small portion of federal government revenue, energy royalties are important to resource-rich states in the mountain west that receive about half of what Washington collects inside their borders. 'These oil and gas royalties are an integral component of many western states' budgets, and suspending their collection would have a direct negative effect on states,' the Western Governors' Association wrote in early April to David Bernhardt, a former oil lobbyist who serves as interior secretary." [*Financial Times*, [06/28/20](#)]

Royalty Relief Totals: BLM Has Approved Royalty Rate Reductions On Over 550 Public Lands Oil And Gas Leases, Mostly In Wyoming

ROYALTY RELIEF: BLM has approved 557 instances of royalty relief Since April 2020. The relief affects 483,128 acres of public land. Of all the royalty relief approved, 72 percent of the leases and 69 percent of the acreage are in Wyoming.

ROYALTY RELIEF (downloaded 09/18/2020)

State	Instances of Royalty Relief	Affected Acres
Wyoming	406	336,914.210
Utah	87	104,066.45
North Dakota	55	35,283.380
Montana	4	2,486.960
Colorado	5	4,377.52
TOTAL	557	483,128.52

SUSPENSIONS: BLM has approved 429 instances of lease suspension Since April 2020. The relief affects 339,987 acres of public land. Of all the approved suspensions, 91 percent of the leases and 94 percent of the acreage are in Wyoming.

LEASE SUSPENSIONS (downloaded 09/18/2020)

State	Number Of Suspensions	Affected Acres
California	2	729.06
Colorado	7	5,546.68
Montana	12	4,616.920
North Dakota	3	2,953.17
New Mexico	12	4,821.42
Texas	1	446.2
Wyoming	392	320,874.33
TOTAL	429	339,987.78

METHODOLOGY: This data is from LR2000 action code searches for codes 625 and 677 with a date range of April 1, 2020 - September 18 2020. April 1 was selected as the first date because BLM's royalty reduction [guidance](#), which was issued on April 21, specifies that "once approved, a royalty rate reduction will be effective on the first day of the month in which the completed application was filed."

Acreage was calculated from the exported LR2000 search results. Acreage was de-duped in cases where a lease is divided between BLM field offices. With the exception of de-duped acreage deletions, the LR2000-exported spreadsheets are unamended.

THEMATICS

EXTRACTIVE COMPANIES DRILLING ON FEDERAL LAND GOT ROYALTY RELIEF AND LEASE SUSPENSIONS ON TOP OF PAYCHECK PROTECTION PROGRAM BAILOUTS

Thirteen Public Lands Oil And Gas Corporations Are Double Dipping Into COVID-19 Bailouts, Taking As Much As \$25.4 Million In PPP Loans while Getting A Break On Their Public Lands Obligations

SUMMARY: While small businesses across the country struggle to stay afloat and unemployment soars during the Coronavirus pandemic, the Trump Administration has funneled up to **\$25.4 million** from the Paycheck Protection Program to energy companies. These same companies have gotten **160 lease suspensions and royalty rate reduction** covering **over 200,000 acres** of federal land. These include:

- **\$2-5 million** and royalty relief or lease suspensions on 13 public lands oil leases to Finely Resources
- **\$350,000-1 million** and a lease suspension on a 122-acres of public land oil and gas lease to Ballard Petroleum
- **\$150,00-350,000** and a lease suspension on a 320-acres of public land oil and gas lease to Trio Petroleum
- **\$1-2 million** and lease suspensions on 23,673 acres of public lands oil leases to Samson Resources
- **\$150,00-350,000** and lease suspensions on 75,242 acres of public lands oil leases to Diamond Resources
- **\$350,000-1 million** and royalty rate reductions on 14,324 acres of public lands oil leases to Crowheart Energy
- **\$150,00-350,000** and royalty rate reduction on 2 public lands oil leases to Prima Exploration
- **\$150,00-350,000** and royalty rate reduction on a public lands oil leases to Black Bear Energy
- **\$2-5 million** and royalty rate reduction on 5 public lands oil leases to White Rock Oil & Gas
- **\$1-2 million** and royalty rate reduction on 28 public lands leases to Mid-Con Energy Operating
- **\$350,000-1 million** and royalty rate reduction on a public land oil lease to The Daube Company

·\$150,000-350,000 and royalty rate reduction on four public lands oil leases to NP Resources
·\$150,000-\$350,000 and royalty relief on one public lands lease to Robert Bayless Producer

The Department Of The Treasury, The Small Business Administration, And The Bureau Of Land Management Set Up Bailout Programs To Help Small Businesses During The COVID-19 Pandemic

The Department Of The Treasury And The SBA Offered Bailouts To Small Businesses Through A Loan Program Called The Paycheck Protection Program

The PPP Program Was Established To Help Small Businesses During The COVID-19 Pandemic. “The Paycheck Protection Program established by the CARES Act, is implemented by the Small Business Administration with support from the Department of the Treasury. This program provides small businesses with funds to pay up to 8 weeks of payroll costs including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. The Paycheck Protection Program prioritizes millions of Americans employed by small businesses by authorizing up to \$659 billion toward job retention and certain other expenses.” [US Department Of The Treasury, accessed [07/09/20](#)]

The BLM Offered A COVID-19 Bailout To Public Lands Oil Drillers Through Suspended Leases And Reduced Royalty Rates

The Bureau Of Land Management (BLM) Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. “In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers.” [E&E, [05/20/20](#)]

The Trump Administration Spent Up To \$25.4 Million To Bail Out Nine Oil And Gas Companies With A Combined 160 Lease Suspensions And Royalty Rate Reductions.

Finley Resources Received A PPP Loan Of Up To \$5 Million After Getting Royalty Relief Or Lease Suspensions On 13 Public Lands Oil Leases

Finley Resources Owns And Operates Oil And Gas Properties. “Finley Resources, Inc. owns, manages, and develops oil and gas properties. The Company engages in exploration and

production of oil and gas. Finley Resources is based in the United States.” [Bloomberg, accessed [07/13/20](#)]

Finley Resources Received A PPP Loan Between \$2 Million And \$5 Million.

b \$2-5 million	LONESOME OIL & GAS COMPANY	717 TEXAS AVENUE SUITE 2500 D.D	HOUSTON	TX	77002	211130 Corporation	Unanswered	Unanswered	Unanswered	150	4/10/20 J
b \$2-5 million	FINLEY RESOURCES INC.	1308 LAKE STREET SUITE 200	FORT WORTH	TX	76102	211130 Subchapter S	Unanswered	Unanswered	Unanswered	178	4/10/20 J

[U.S. Small Business Administration, accessed [07/09/20](#)]

Finley Resources Has Received 13 Separate Royalty Relief Or Lease Suspension Approvals Totaling 37,102 Acres In Utah And Wyoming

- **Finley Resources Has Received One Approved Royalty Rate Reduction To 2.5% In Utah.** The lease covers 5,767 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Finley Resources Has Received One Approved Lease Suspension In Wyoming.** The lease covers 20,000 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Lonesome Oil & Gas Has Received Royalty Relief To 2.5% For 11 Separate BLM Oil & Gas Leases In Utah.** Lonesome’s leases affected by royalty relief affect 11,258.74 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Lonesome’s New Royalty Rate Is 2.5% For All 11 Leases.** [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Lonesome Oil & Gas Is A Subsidiary Of Finley Resources. “Finley Resources, Finley Production and Lonesome Oil & Gas, LLC. (collectively the "Finley Resources Group") own interests in approximately 3,000 wells in thirteen states. Finley Resources now operates over 1,000 of those wells in Texas, Oklahoma, New Mexico, Alabama, Mississippi, North Dakota, Wyoming and Utah. Finley Resources has approximately 100 employees. The company maintains over 100,000 acres of leasehold and mineral interest.” [Finley Resources, accessed [07/09/20](#)]

Ballard Petroleum Got A PPP Loan For As Much As \$1 Million After Having One Of Its Public Lands Oil Leases Suspended In Wyoming

Ballard Petroleum Develops Is An Oil And Gas Producer. “Headquartered in Billings, Montana, Ballard Petroleum Holdings LLC is a privately held, independent energy company primarily engaged in the development of oil and natural gas reserves in the Powder River Basin of Wyoming. The Company is currently the 5th largest oil producer in the Powder River Basin (2018).” [Ballard Petroleum Holdings LLC, About Us, accessed [07/13/20](#)]

Ballard Petroleum Received A PPP Loan Between \$350,000 And \$1 Million.

c \$350,000-\$1 million	BAIRD PETROLEUM HOLDINGS, LLC	845 12th St W O	BILLINGS	MT	59102	211120 Limited Liab	Unanswered	Unanswered	Unanswered	40	4/27/20 C
c \$350,000-\$1 million	BAIRD PETROLEUM HOLDINGS, LLC	845 12th St W O	BILLINGS	MT	59102	211120 Limited Liab	Unanswered	Unanswered	Unanswered	44	4/27/20 C

[U.S. Small Business Administration, accessed [07/09/20](#)]

Ballard Petroleum Received A Lease Suspension For A 122-Acre Public Lands Oil And Gas Lease In Wyoming. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Trio Petroleum Received A PPP Loan As High As \$350,000 After Getting A Lease Suspension In California

Trio Petroleum Is An Oil And Gas Exploration Company. [Better Business Bureau, Trio Petroleum LLC, accessed [07/13/20](#)]

Trio Petroleum Received A PPP Loan Between \$150,000 And \$350,000.

\$150,000-350,000	TOTAL PROCESS SOLUTIONS	1400 Norris Road	BAKERSFIELD	CA	93308	213112	Limited	Liab	White	Unanswered	Unanswered	17	4/10/20
\$150,000-350,000	TRIO PETROLEUM LLC	5401 BUSINESS PARK SOUTH STE 111	BAKERSFIELD	CA	93309	213112	Limited	Liab	Unanswered	Unanswered	Unanswered	7	4/28/20
\$150,000-350,000	TRIUMPH INSPECTIONS INC	20301 CRYSTALF HAW	BAKERSFIELD	CA	93314	213112	Corporation	Unanswered	Unanswered	Unanswered	Unanswered	17	4/11/20

[U.S. Small Business Administration, accessed [07/09/20](#)]

Trio Petroleum Got Its 320-Acre Public Lands Oil And Gas Lease In California Suspended. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Samson Resources Received A PPP Loan Of Up To \$2 Million After Getting Suspensions On 54 Public Lands Oil Leases

Samson Resources Is An Oil And Gas Company. “Samson Resources Corp operates as an oil and gas company. The Company explores, develops, and produces oil and natural gas. Samson Resources serves customers in the State of Oklahoma.” [Bloomberg, accessed [07/13/20](#)]

Samson Resources Received A PPP Loan Between \$1 Million And \$2 Million.

\$1-2 million	PARK ENERGY SERVICES, LLC	1015 N Broadway Ave Suite 301	OKLAHOMA CITY	OK	73102	211120	Limited	Liab	Unanswered	Unanswered	Unanswered	83	4/13/20
\$1-2 million	SAMSON RESOURCES II OP CO, LLC	15 East 5th Street, Ste 1000 0.0	TULSA	OK	74103	211120	Limited	Liab	Unanswered	Unanswered	Unanswered	68	4/14/20
\$1-2 million	SHEBESTER-BECHTEL, INC.	400 S JERNIGAN BLVD	OKLAHOMA CITY	OK	73128	211120	Subchapter S White	Male Owned	Non-Veteran			75	4/8/20

[U.S. Small Business Administration, accessed [07/09/20](#)]

Samson Resources Has Received 54 Separate BLM Lease Suspensions Covering 23,673. Acres Of Public Land In Wyoming. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **Of All The Companies Receiving Lease Suspensions, Only One Has Received More Than Samson Resources.** Only Chesapeake Exploration has received more lease suspensions than Samson Resources.[BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Diamond Resources Received A PPP Loan Of Up To \$350,000 While Getting COVID-19 Lease Suspensions On 47 Leases Covering 75,242 Acres In Wyoming

Diamond Resources Is An Energy Company. “DIAMOND RESOURCES CO. is a North Dakota corporation with offices in Denver, Colorado and Williston, North Dakota, providing energy land services throughout the United States. Established in 1980, Diamond has worked for over 75 client-companies in more than 17 states. Diamond's services include leasing, title examination, right-of-way acquisition, drill site permitting and landowner settlements,

unitization, and various other energy-land related activities including mineral appraisals.”
[LinkedIn, Diamond Resources, accessed [07/13/20](#)]

Diamond Resources Received A PPP Loan Between \$150,000 And \$350,000.

d \$350,000-1 million	AG ACQUISITIONS INC	8333 COUNTY	LANSFORD	ND	58750	523910 Corporation	Unanswered	Unanswered	Unanswered	20	5/3/20
e \$150,000-350,000	DIAMOND RESOURCES CO	602 11TH ST W	WILLISTON	ND	58801	523910 Subchapter S White	Male Owned	Unanswered		15	4/6/20
d \$350,000-1 million	BROWN IMMIGRATION LAW PC LLO	201 N 13TH ST STE B	LINCOLN	NE	68508	523910 Limited Liabl White	Unanswered	Unanswered		30	4/3/20

[U.S. Small Business Administration, accessed [07/09/20](#)]

Diamond Resources Received 47 Separate BLM Lease Suspensions In Wyoming. The leases cover 75,242 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Crowheart Energy Services Received A PPP Loan As High As \$1 Million While It Was Getting A Reduced Royalty Rate On Its Public Lands Oil Leases

Crowheart Energy Is An Oil And Gas Company. “Crowheart Energy is an upstream oil and gas company focused on the acquisition and development of operated assets in Wyoming’s Wamsutter Field. Our Company was founded in 2017 in partnership with Madava Group and a group of sophisticated private investors.” [Crowheart Energy, accessed [07/13/20](#)]

Crowheart Energy Services Received A PPP Loan Between \$350,000 And \$1 Million.

f \$350,000-1 million	BUTLER WELL SERVICE, LLC	24792 COUNTY ROAD 37 / PO BOX 083	STERLING	WY	80132	213111 Limited Liab	Unanswered	Unanswered	Unanswered	34	4/6/20
f \$350,000-1 million	CROWHEART ENERGY SERVICES, LLC	1225 17th Street Suite 2950	DENVER	CO	80202	213111 Limited Liab	Unanswered	Unanswered	Unanswered	54	4/16/20
f \$350,000-1 million	ROBERT I RAYLESS PRODUCER LLC	631 17th Street #7300	DENVER	CO	80203	211120 Subchapter S White	Male Owned	Unanswered		18	4/4/20

[U.S. Small Business Administration, accessed [07/09/20](#)]

Crowheart Energy Received A Reduced Royalty Rate On Its Public Lands Oil And Gas Leases In Wyoming. Crowheart’s royalty rate was reduced to just 0.5% on 14 public lands oil and gas leases in Wyoming encompassing 14,324 acres. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Prima Exploration Got A PPP Loan Of Up To \$350,000 And Had Its Royalty Rates Reduced

Prima Explorations Is An Oil And Gas Company. “Prima Exploration, Inc. was founded in 1980. The Company's line of business includes operating oil and gas field properties.” [Bloomberg, accessed [07/13/20](#)]

Prima Exploration Received A PPP Loan Between \$150,000 And \$350,000.

e \$150,000-350,000	MAGPIE OPERATING, INC.	2707 s COUNTY ROAD 11	LOVELAND	CO	80537	211120 Subchapter S White	Male Owned	Unanswered		13	4/4/20
e \$150,000-350,000	PRIMA EXPLORATION INC	250 FILLMORE ST STE 500	DENVER	CO	80206	211120 Subchapter S White	Male Owned	Unanswered		0	4/7/20
e \$150,000-350,000	ROBERT I RAYLESS PRODUCER LLC	631 17th Street #7300	DENVER	CO	80203	211120 Subchapter S White	Male Owned	Unanswered		18	4/4/20

[U.S. Small Business Administration, accessed [07/09/20](#)]

Prima Exploration Got A Reduced Royalty Rate On Two Public Lands Oil And Gas Leases In Wyoming. Its new royalty rate is just 0.5%. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Black Bear Energy Got A PPP Loan Of Up To \$350,000 After Having Its Public Lands Royalty Rate Reduced To Just .5%

Black Bear Energy Is An Energy Development Company. “Black Bear Energy is a renewable energy development company serving the needs of the real estate community.” [LinkedIn, Black Bear Energy Inc, accessed [07/13/20](#)]

Black Bear Energy Received A PPP Loan Between \$150,000 And \$350,000.

\$150,000-350,000	BEACON HILL INVESTMENTS, INC.	2091 S GALAPAGO ST	DENVER	CO	80223	523910	Unanswered	Unanswered	Unanswered	15	5/1/20	
e \$150,000-350,000	BLACK BEAR ENERGY, INC.	1216 Pearl St, Boulder	BOULDER	CO	80302	523910	Corporation	Unanswered	Unanswered	Unanswered	15	4/28/20
e \$150,000-350,000	RMH-RI CONGREGATION	560 S. MONACO PKWY	DENVFR	CO	80274	523910	Non-Profit O	Unanswered	Unanswered	Unanswered Y	47	4/8/20

[U.S. Small Business Administration, accessed [07/09/20](#)]

[U.S. Small Business Administration, accessed [07/09/20](#)]

Black Bear Energy Got A Reduced Royalty Rate On Its Public Lands Oil And Gas Lease In Wyoming. Its royalty rate was reduced to just 0.5%. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

White Rock Oil & Gas Got A PPP Loan Of Up To \$5 Million After Getting Reduced Royalty Rates On Its Public Lands Oil And Gas Leases In North Dakota

White Rock Oil & Gas Invests In Oil And Gas Wells In The United States. “White Rock, founded in 2012, invests in onshore U.S. producing oil and gas wells on behalf of its institutional clients.” [White Rock Oil & Gas, accessed [07/13/20](#)]

White Rock Oil & Gas Received A PPP Loan Between \$2 Million And \$5 Million.

b \$2-5 million	TEXLAND PETROLEUM, LP	777 MAIN ST Suite 3200	FORT WORTH	TX	76102	211111	Subchapter S	Unanswered	Unanswered	Unanswered	79	4/5/20
b \$2-5 million	WHITE ROCK OIL & GAS, LLC	5810 Tennyson Parkway Suite 500	PLANO	TX	75025	211111	Limited Liab	Unanswered	Unanswered	Unanswered	109	4/9/20
a \$500,000-1 million	NETRAX OIL INC	6000 NE 10TH AVE CTE A107	CAN ANTONIO	TX	78105	211111	Corporation	Unanswered	Unanswered	Unanswered	31	5/3/20

[U.S. Small Business Administration, accessed [07/09/20](#)]

White Rock Oil & Gas Got Reduced Royalty Rates On Five Public Lands Oil And Gas Leases In North Dakota. Its royalty rate was reduced to just 0.5%. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Mid-Con Energy Operating Received A PPP Loan Of Up To \$2 Million

Mid-Con Energy Operating Got A PPP Loan Between \$1,000,000 And \$2,000,000.

[Accountable.US, accessed [09/29/20](#)]

Mid-Con Energy Operating Got Royalty Relief On 28 Public Lands Leases Covering 45,275 Acres In Wyoming. Its royalty rate was reduced to 0.5%. [BLM LR2000, accessed 09/29/20]

The Daube Company Received A PPP Loan Of Up To \$1 Million

The Daube Company Got A PPP Loan Between \$350,000 And \$1,000,000. [Accountable.US, accessed [09/29/20](#)]

The Daube Company Received Royalty Relief On One Acre Of Public Land In Wyoming Covering 121 Acres. Its reduced rate was 0.5%. [BLM LR2000, accessed 09/29/20]

NP Resources Received A PPP Loan Of Up To \$350,000

NP Resources Got A PPP Loan Between \$150,000 And \$350,000. [Accountable.US, accessed [09/29/20](#)]

NP Resources Received Royalty Relief On Four Public Lands Leases Covering 4,290 Acres Of Public Land In North Dakota. Its reduced royalty rate was 0.5% [BLM LR2000, accessed 09/29/20]

Robert Bayless Producer Received A PPP Loan Of Up To \$350,000

Robert Bayless Producer LLC Got A PPP Loan Between \$150,000 And \$350,000. [Accountable.US, accessed [09/29/20](#)]

Robert Bayless Received Royalty Relief On Its Public Lands Oil Lease In Utah. Its reduced rate was 2.5%. [BLM LR2000, accessed 09/29/20]

OIL AND GAS COMPANIES THAT RECEIVED THE MOST ROYALTY RELIEF HAD CONNECTIONS TO THE TRUMP ADMINISTRATION

Public Land Oil Drillers With Connections To Pendley, Bernhardt, And A History Of Donating To Trump's Presidential Campaigns Got Royalty Relief And Lease Suspensions On 181,832 Acres Of Public Land

SUMMARY: As the COVID-19 pandemic ravages the economy, the Trump Administration's Bureau of Land Management responded by giving royalty relief and lease suspensions to public lands oil drillers. Some of the oil and gas companies that got the most relief have connections to David Bernhardt, the William Perry Pendley-affiliated Petroleum Association of Wyoming, or donated to Trump presidential campaigns. These include:

- **16 lease suspensions** over 11,762 acres to an oil and gas company that's a platinum sponsor of the Petroleum Association of Wyoming
- **109 lease suspensions** to an oil and gas company that's donated to Trump's presidential campaigns and sponsors the Petroleum Association of Wyoming
- **Royalty relief on 54 leases** to an oil and gas company that's donated to Trump's presidential campaigns and has employees on the Petroleum Association of Wyoming's board
- **54 lease suspensions** to an oil and gas company that sponsor the Petroleum Association of Wyoming and previously employed William Perry Pendley as an attorney

The Trump Administration Offered Energy Companies Operating On Public Lands Royalty Relief And Lease Suspensions Through The Bureau Of Land Management

The BLM Offered A COVID-19 Bailout To Public Lands Oil Drillers Through Suspended Leases And Reduced Royalty Rates

The Bureau Of Land Management (BLM) Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. "In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what

critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers.” [E&E, [05/20/20](#)]

The Petroleum Association Of Wyoming Worked Directly With BLM On Its Royalty Relief Program, And Is Eager To Get More Bailouts For Its Members Who Drill On Public Lands

William Perry Pendley Was Recused From Working On Particular Matters Involving the Petroleum Association of Wyoming For Two Years...

William Perry Pendley is Recused from Participating Personally and Substantially In Particular Matters Involving Specific Parties That Are Directly and Substantially Related to the Petroleum Association of Wyoming Until July 15, 2021 Under EO 13770, Paragraph 6. [William Perry Pendley Recusal List, accessed [06/02/20](#)]

- William Perry Pendley Is Also Recused from Participating Personally and Substantially In Particular Matters Involving Specific Parties That Are Directly and Substantially Related to the Petroleum Association of Wyoming Under 5 C.F.R 18 § 2635.502 and 5 C.F.R 18 § 2635.101(b)(14). [William Perry Pendley Recusal List, accessed [06/02/20](#)]

...But Now The Agency He Leads Is Giving Bailouts To Wyoming Oil Producers More Than Anyone Else

BLM Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. “In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers.” [E&E, [05/20/20](#)]

A June 1 Analysis Of Data From BLM’s LR2000 Database Shows That Of Approved Suspension Requests, Most Have Gone To Producers In Wyoming. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- BLM Has Approved 432 Requests For Royalty Relief And Lease Suspensions As Of June 1, 2020. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
 - Of Those Requests, 348 Have Been In Wyoming. This amounts to 80.5 percent of all approved lease suspensions and royalty reductions during the pandemic. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- Approved Suspensions And Royalty Relief Requests Have Impacted 382,300 Acres Of Public Land As Of June 1, 2020. [BLM LR2000 Lease Suspension And Royalty Relief

Database, [06/01/20](#)]

- **Of The Total Acreage, 281,629 Acres Have Been In Wyoming.** [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

The Petroleum Association Of Wyoming Has Bragged About Its Influence On BLM's Royalty Relief Bailouts

Pete Obermueller, Director Of The Wyoming Petroleum Association, Gave A Presentation To The Wyoming Business Council On April 15, 2020 About His Association's Efforts To Respond To The Pandemic. Pete Obermueller said, "I wanted to talk just real quickly about a few of the efforts that the Association has been making to A.) respond to the immediate needs related to the coronavirus." [Wyoming Business Council on YouTube, [04/15/20](#) (00:08:04)]

Pete Obermueller Said That His Association Worked Directly With BLM To Develop A Template Application To Make It Easier For Oil Companies To Get Relief. Pete Obermueller said, "Essentially, it boils down to, in the case of leases and APDs for exploration and production, both at state lands and at the federal government, they're both operating on a case-by-case basis. And so I have asked operators to reach out. As it relates to royalty reductions on federal lands, the Washington BLM office has directed that that can happen on a lease-by-lease basis with applications at the state Office. And that's been a little bit tricky as there's not been guidance about that. However, PAW and other attorneys are working on a potential template application, and we're working with the state BLM office to help ease their burden on that as well, so that we can get that out to all operators large and small to be able to apply for temporary royalty relief on a lease-by-lease basis, to the extent that that the national legislature or the national office doesn't go to blanket royalty relief." [Wyoming Business Council on YouTube, [04/15/20](#) (00:09:58)]

- **Obermueller Said Agencies' Response To His Efforts Have Been Favorable.** Obermueller Said Pete Obermueller said, "So, immediately what the association works towards doing is pushing the pause button a little bit and relaxing some of those requirements, so that in-person signatures weren't necessary, so that payments could be done electronically as opposed to physical checks. And that certain deadlines could be delayed without penalty. The agencies have responded in various ways, most of them have responded pretty favorably." [Wyoming Business Council on YouTube, [04/15/20](#) (00:09:15)]

Obermueller Also Said He Is Working With BLM To Resolve Difficulties With Processing Applications. Pete Obermueller said, "The most challenging thing right now, particularly for those operators operating on public lands, is how to engage with BLM. And that has been difficult because the situation has been fluid. There were efforts in the United States Congress to try to have royalty relief in the phase three package of the coronavirus response. That was blocked, and the department fell back on its existing authority, which is lease-by-lease. I think that shift by the Washington office caught the states by surprise a little bit and so they weren't really prepared for an influx of requests with respect to individual royalty relief. So that's an issue we're working to try to resolve as we Speak." [Wyoming Business Council on YouTube, [04/15/20](#) (00:17:38)]

Obermueller Said He Preferred Lease Suspensions To Royalty Relief Because They Give Oil Companies More Time To Drill. “Petroleum Association of Wyoming President Pete Obermueller said in a June interview that he appreciated all offers of financial support for his member companies, but that at the time, oil prices were so low that even the elimination of taxes and royalties couldn’t make extraction profitable for some producers. US Realm is not a Petroleum Association of Wyoming member. Obermueller favored a second relief option offered by the BLM that allowed operators to temporarily suspend their federal leases without penalty. ‘The most important thing is for companies to be able to hold on to their permits and their lease positions, and make economic decisions about those in a time when the economy isn’t standing on its head,’ he said.” [*Buffalo Bulletin*, [09/30/20](#)]


Some Of The Biggest Beneficiaries Of BLM Bailouts In Wyoming Are Petroleum Association Of Wyoming Members And Sponsors With Additional Connections To The Trump Administration

Northwood Energy Is A Platinum Sponsor Of The Petroleum Association Of Wyoming And Has An Employee On Their Board Of Directors. Northwood Received Lease Suspensions On 11,762 Acres Of Public Land.

Northwood Energy Is An Oil And Gas Company. “Northwoods Energy LLC operates as an oil and gas company. The Company engages in acquisition and development of upstream oil and gas properties.” [*Bloomberg*, accessed [07/14/20](#)]

Northwoods Lands Inc Has Received 16 Separate BLM Lease Suspensions Totaling 11,762 Acres. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **Kaylene Gardner Of Northwoods Is On The Petroleum Association Of Wyoming’s Board Of Directors.** [Petroleum Association Of Wyoming, accessed [06/02/20](#)]
 - **Gardner Is Also On The Petroleum Association Of Wyoming’s Management Committee.** [Petroleum Association Of Wyoming, accessed [06/02/20](#)]
- **Northwoods Energy Is A Platinum Sponsor Of The Petroleum Association Of Wyoming.**

2020 PLATINUM SPONSORS	CONTACT
	Petroleum Association of Wyoming 951 Werner Court, Suite 100 Casper, WY 82601-1351 PHONE: 307.234.5333

[Petroleum Association Of Wyoming, [accessed 06/02/20](#)]

Platinum Petroleum Association Of Wyoming Sponsor Chesapeake Energy Received A Quarter Of All Approved Lease Suspensions After Donating To Trump Presidential Campaigns In 2016 And 2020.

Chesapeake Energy Is An Oil And Gas Company. “We are an independent exploration and production company engaged in the acquisition, exploration and development of properties to produce oil, natural gas and NGL from underground reservoirs.” [SEC EDGAR – Chesapeake Energy 10-K, [02/27/20](#)]

- **Chesapeake Exploration Has Received 109 -- A Quarter Of All Approvals During The Pandemic-- Separate BLM Lease Suspensions, More Than Any Other Company.** Chesapeake Exploration has a majority stake in 109 suspended BLM leases in Wyoming, spanning 73,104 acres. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Chesapeake Exploration Is A Subsidiary Of Chesapeake Energy.** [SEC, accessed [05/18/20](#)]

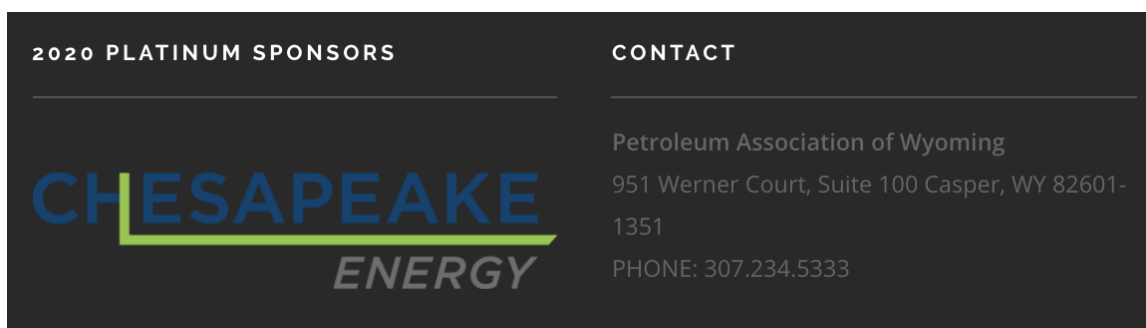
Chesapeake Energy Donated \$2,942 To Donald Trump’s Presidential Campaign In 2016. [Chesapeake Energy Donation Recipients 2016, [OpenSecrets](#), accessed 05/28/20]

Chesapeake Energy Donated \$95 To Donald Trump’s Presidential Campaign In 2020. [Chesapeake Energy Donation Recipients 2020, [OpenSecrets](#), accessed 05/28/20]

Brian Woodward Of Chesapeake Energy Is On The Petroleum Association Of Wyoming’s Board Of Directors. [Petroleum Association Of Wyoming, accessed [06/02/20](#)]

Drew Harold Of Chesapeake Operating Is The Chairman Of The Petroleum Association Of Wyoming’s Government Relations Tax Subcommittee. [Petroleum Association of Wyoming, accessed [06/02/20](#)]

- **Chesapeake Energy Is A Platinum Sponsor Of The Petroleum Association Of Wyoming.**



[Petroleum Association Of Wyoming, [accessed 06/02/20](#)]

Kirkwood Oil & Gas Has Employees On The Petroleum Association Of Wyoming's Board And Donated Twice To Donald Trump's Presidential Campaign. Out Of All Companies Receiving Relief, Kirkland Got The Most.

Kirkwood Oil & Gas Produces Oil And Gas Drilling In The United States. "William C. Kirkwood started Kirkwood Oil and Gas in 1965 after leaving Shell Oil. From its inception in 1965 to approximately 1975, the main emphasis of the company was the acquisition of oil and gas leases in known oil and gas producing areas. The leases were upgraded into drilling prospects and sold to third parties. As the company continued to grow, it began to operate more of the promoted wells and in 1982 WESCO Operating, Inc. (A Kirkwood Company) was formed to handle the required management of well drilling and operations." [The Kirkwood Companies, accessed [07/14/20](#)]

Kirkwood Oil & Gas Has Received Royalty Relief For 54 Separate BLM Oil & Gas Leases In Utah. Kirkwood is a co-lessee with Nerd Gas on 54 separate oil and gas leases covering 71,328 acres of public land in Utah. Its royalty rate has been reduced from 12.5% to 0.5%. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **Of All The Companies Receiving Relief, None Has Received More Than Kirkwood and Nerd.** [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Additionally, Kirkwood Oil Has Received Lease Suspensions For Two BLM Leases In Wyoming Totaling 1,963 Acres.** [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Steven Kirkwood Of Kirkwood Oil & Gas Gave \$800 To Donald Trump's 2016 Presidential Campaign.

- Steven C. Kirkwood Of Kirkwood Oil & Gas Gave \$400 To Donald J. Trump For President, Inc. On July 19, 2016. [FEC, [07/19/16](#)]
- Steven C. Kirkwood Of Kirkwood Oil & Gas Gave \$400 To Donald J. Trump For President, Inc. On August 24, 2016. [FEC, [08/24/16](#)]

Steve Degenfelder Of Kirkwood Oil and Gas Is The Vice Chairman Of The Petroleum Association Of Wyoming's Board. [Petroleum Association Of Wyoming, accessed [06/02/20](#)]

Cary Brus Of Nerd Gas Company Is The Vice Chairman Of The Petroleum Association Of Wyoming's Board. [Petroleum Association Of Wyoming, accessed [06/02/20](#)]

David Bernhardt Used To Lobby For Samson Resources. The Oil Company, A Petroleum Association Of Wyoming Platinum Sponsor, Got 54 Lease Suspensions From The Bernhardt-Led Interior Department.

Samson Resources Federal Lobbying Disclosure Forms Listed David Bernhardt As Their Lobbyist. [Samson Resources Lobbying Registration, [03/20/12](#)]

- **Samson Resources Is An Oklahoma Oil Company.** "Samson Resources Corp operates as an oil and gas company. The Company explores, develops, and produces oil and natural gas. Samson Resources serves customers in the State of Oklahoma." [Bloomberg, accessed [06/08/20](#)]
- **Samson Resources Has Substantial Oil and Gas Assets in Wyoming.** "The investments in Wyoming's Powder River basin are paying off for Tulsa's Samson Resources II. The company announced production of two major wells in the Frontier formation of Converse County, Wyoming – both with production of more than 3,400 barrels a day. [...] Joseph A. Mills, President and CEO of the Company stated, 'The Bohlander and Allemand Frontier formation well results further illustrate the target rich nature of Samson's 154,000 net acres in the Powder River Basin.'" [OK Energy Today, [11/12/19](#)]

Samson Resources Has Received 54 Separate BLM Lease Suspensions Covering 23,673. Acres Of Public Land In Wyoming. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Of All The Companies Receiving Lease Suspensions, Only One Has Received More Than Samson Resources. Only Chesapeake Exploration has received more lease suspensions than Samson Resources.[BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Samson Resources Is A Platinum Sponsor Of The Petroleum Association Of Wyoming.

2020 PLATINUM SPONSORS



CONTACT

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1351
PHONE: 307.234.5333

[Petroleum Association Of Wyoming, [accessed 06/02/20](#)]

- **Samson Resources Has Received 52 Separate BLM Lease Suspensions.** [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

PUBLIC LAND OIL DRILLERS WITH HISTORIES OF DODGING ROYALTY PAYMENTS GOT ROYALTY RATE REDUCTIONS FROM THE TRUMP ADMINISTRATION

Oil And Gas Companies That Have Paid Close To \$19M For Dodging Royalty Payments Got Royalty Relief And Lease Suspensions From The Trump Administration

SUMMARY: As the COVID-19 pandemic ravages the economy, the Trump Administration's Bureau of Land Management responded by giving royalty relief and lease suspensions to public lands oil drillers. Some recipients of the relief have a long history of dodging royalty payments with combined fines to the oil and gas companies nearing **\$19 million**. These include:

- Royalty rate reductions on 3,813 acres of public land to an oil and gas company with **\$890,000** in fines for offshore royalty dodging in 2019
- Royalty rate reductions and lease suspensions on 2,080 acres of public land to an oil and gas company with a **\$5,189,800** fine for filing false royalty reports
- A lease suspension on 200 acres of public land to an oil and gas company that's incurred **\$8,260,752** in fines and settlement payments for dodging royalties
- 67 lease suspensions to an oil and gas company with **\$3,312,300** in penalties for inaccurate royalty reporting
- Royalty rate reductions and lease suspensions on 37,102 acres of public land to an oil and gas company that was fined **\$81,952** for failing to report production on federal leases
- Royalty rate reductions on 160 acres of public land to an oil and gas company with **\$1,207,800** for inaccurate production reports

The Trump Administration Offered Energy Companies Operating On Public Lands Royalty Relief And Lease Suspensions Through The Bureau Of Land Management

The BLM Offered A COVID-19 Bailout To Public Lands Oil Drillers Through Suspended Leases And Reduced Royalty Rates

The Bureau Of Land Management (BLM) Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. "In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid

processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers.” [E&E, [05/20/20](#)]

The Bureau Of Land Management Gave Royalty Relief To Public Land Oil Drillers With Nearly \$19M In Fines And Settlement Payment From Dodging Royalties

ExxonMobil Got A Royalty Reduction Even Though It Had To Pay Nearly \$1 Million In Penalties For Dodging Royalties In 2018

ExxonMobil Got Its Royalty Rate Cut To 0.5% On Three Public Land Leases In Wyoming And North Dakota. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **XTO Energy Got A Royalty Rate Reduction Of 0.5% On A 120-Acre Oil Lease In Wyoming.** [WYW 03472, accessed [06/10/20](#)]
- **XTO Energy Got Two Royalty Rate Reductions To 0.5% On 3,693 Acres Of Public Lands Oil And Gas Leases In North Dakota.** [NDM 032773, accessed [07/08/20](#) and NDM 015753, accessed [07/08/20](#)]
- **XTO Energy Is A Subsidiary Of ExxonMobil.** “XTO became the largest natural gas producer in the United States, with 5.4 percent of all footage drilled in the country in 2009. XTO merged with ExxonMobil, in a deal valued at \$41 billion. This teamed XTO’s expertise and experience in the natural gas business with ExxonMobil’s cutting-edge technologies, financial strength and historic leadership in the global energy industry.” [XTO Energy, accessed [06/10/20](#)]

ExxonMobil, One Of The World’s Largest Corporations, Brags, “We Operate Facilities Or Market Products In Most Of The World’s Countries.” “ExxonMobil, one of the world’s largest publicly traded energy providers and chemical manufacturers, develops and applies next-generation technologies to help safely and responsibly meet the world’s growing needs for energy and high-quality chemical products. Access to energy underpins human comfort, mobility, economic prosperity and social progress. It touches nearly every aspect of modern life. Over the course of its long history of more than a century, ExxonMobil has evolved from a regional marketer of kerosene to an advanced energy and chemical innovator, and one of the largest publicly traded companies in the world. An industry leader in almost every aspect of the energy and chemical manufacturing businesses, we operate facilities or market products in most of the world’s countries, explore for oil and natural gas on six continents, and research and develop next-generation technologies to help meet the dual challenge of fueling global

economies while addressing the risks of climate change.” [ExxonMobil, accessed [06/10/20](#)]

ExxonMobil Had To Pay \$890,000 In Penalties After Dodging Offshore Royalties In 2019. “XTO Energy: Company knowingly or willfully failed to provide requested information for a royalty audit of fourteen oil and gas communization agreements, preventing auditors from completing the audit within its scheduled timeframe. Amount: \$890,000” [ONRR Penalty Collections FY2019, accessed [06/10/20](#)]

BP Got Royalty Reductions On 2,080 Acres Of Public Land Despite Over \$5 Million In Penalties For Dodging Royalties In 2012

BP America Got A Royalty Reduction To 0.5% And A Lease Suspension On Two BLM Leases In Wyoming Covering 2,080 Acres.

- BP America Production Company Got A Royalty Reduction To 0.5% On A 160-Acre Lease In Wyoming. [WYW 09754, accessed [06/10/20](#)]
- BP America Production Company Got A Suspension On A 1,920 Acre Public Land Lease In Wyoming. [WYW 142974, accessed [06/10/20](#)]

BP Operates In 79 Countries And Has \$278 Billion In Annual Revenues. “We are a global energy business with wide reach across the world's energy system. We have operations in Europe, North and South America, Australasia, Asia and Africa.” [BP, accessed [06/10/20](#)]

BP Was Fined Over \$5 Million For Knowingly Filing False Offshore Royalty Reports In 2012. “BP America: Company knowingly or willfully \$5,189,800.00 submitted at least 21 false, misleading, or inaccurate royalty reports during 2009. Penalty Amount: \$5,189,800.” [ONRR Penalty Collections FY2012, accessed [06/10/20](#)]

Citation Got A Public Lands Oil Lease Suspended After Paying Over \$8M In Fines And Settlements For Dodging Royalties Since 2008

Citation 2002 Investment Received A Lease Suspension On A 200-Acre Public Lands Oil And Gas Lease In Wyoming. The lease covers 200 acres of public land. [WYW 055076, accessed [06/09/20](#)]

- Citation 2002 Investment Is Located At 14077 Cutten Road In Houston, Texas. [WYW 055076, accessed [06/09/20](#)]
- 14077 Cutten Road Is The Address Of The Citation Oil And Gas. [Citation Oil & Gas, accessed [06/09/20](#)]

Citation Oil & Gas Is One Of The Largest Privately-Held Oil Companies In The United States. "Citation Oil & Gas Corp. is one of the largest privately-held independent oil & gas acquisition, development and production companies in the United States. Founded in 1981 by Forrest E. Harrell, Sr., Citation has built a significant portfolio of mature, long-life producing properties through a combination of disciplined acquisitions, focused operations and subsequent development. Since 1985, Citation has invested \$2.1 billion in over 80 oil and gas reserve acquisitions. As a result of these acquisitions and subsequent property development, Citation now has ownership interests in approximately 15,600 wells in over 400 separately designated fields that contain over 216 million net equivalent barrels of proved reserves, and has net production of approximately 27,150 barrels of oil and 32 million cubic feet of gas per day. Citation's reserves are 88% oil and 76% are proved developed and have a reserve life index of 18 years." [Citation Oil & Gas, accessed [06/09/20](#)]

Citation Was Assessed \$2.25 Million In Penalties Under The False Claims Act For Underpaying Royalties Owed On Its Federal Leases In Wyoming. "Citation Oil & Gas Corp. and its affiliates, Citation 2002 Investment Limited Partnership and Citation 2004 Investment Limited Partnership (collectively, "Citation"), have agreed to pay \$2.25 million to resolve allegations under the False Claims Act that they underpaid royalties owed on natural gas produced from federal lands in Wyoming, the Justice Department announced today. Citation Oil & Gas Corp. is an oil and gas acquisition, development, and exploration company headquartered in Houston, Texas." [Department Of Justice, [12/19/17](#)]

- **DOJ Officials Said Citation Sought "To Take Improper Advantage Of The Federal Royalty Program At The Expense Of American Taxpayers."** "'The United States allows companies to remove gas from public lands, which belong to all of us, in exchange for the full payment of royalties owed,' said Acting Assistant Attorney General Chad Readler of the Justice Department's Civil Division. 'This settlement demonstrates that the government will hold accountable those who seek to take improper advantage of the federal royalty program at the expense of American taxpayers.' [...] 'When gas companies reduce the amount of money owed to the government by taking deductions they are not entitled to, American taxpayers don't get their fair share. This settlement is a message to the entire gas industry that the government is working together to hold them accountable,' said Acting U.S. Attorney Bob Troyer for the District of Colorado." [Department Of Justice, [12/19/17](#)]

Citation Was The Subject Of A Class Action Lawsuit For Dodging Royalties To Oklahomans Between 1997 And 2017. "JND Class Action Administration has issued the following news release: All non-excluded owners of a Royalty Interest in Oklahoma wells with respect to whom Citation paid or incurred an obligation to pay proceeds derived from the sale of oil, gas and/or other minerals occurring from the production month of January 1997 through and including the production month of March 2017; provided that excluded from the Settlement Class are those persons and entities listed on Appendix 1 to the Settlement Agreement. The Litigation seeks damages for Defendant's alleged failure to pay statutory interest on allegedly late payments under Oklahoma law. Defendant expressly denies all allegations of wrongdoing or liability with respect to the claims and allegations in the Litigation." [JND Class Action Administration, [10/12/18](#)]

- **Citation Agreed To Pay A Settlement Fund Of \$3,000,000 To Its Private Royalty Owners.** “On September 21, 2018, the Court preliminarily approved a Settlement in which Defendant has agreed to pay Three Million Dollars (\$3,000,000.00) in cash (the ‘Gross Settlement Fund’). From the Gross Settlement Fund, the Court may deduct Class Counsel’s Fees and Expenses, a case contribution award, and any settlement Administration, Notice, and Distribution Costs. The remainder of the fund (the ‘Net Settlement Fund’) will be distributed to Final Class Members or credited to their suspense accounts as provided in the Settlement Agreement. Complete information on the benefits of the Settlement, including information on the distribution of the Net Settlement Fund, can be found in the Settlement Agreement posted on the website listed below. In exchange, Class Members will release Defendant and others identified in the Settlement Agreement from the claims described in the Settlement Agreement.” [JND Class Action Administration, [10/12/18](#); Settlement Agreement, [08/08/18](#)]

Citation Had To Pay \$3,00,000 To Interior After It Was Caught Providing Altered Contracts To Government Auditors In 2008. “Citation Oil & Gas Corporation: Company knowingly or willfully provided altered contracts to government auditors which concealed important information and delayed audit completion.” [ONRR Case CP03-049, accessed [06/09/20](#)]

Citation Had To Pay \$10,752 After Failing To Report Production On A Federal Well In 2014. “Citation Oil And Gas: Company failed to report production on one well for five production months.” [ONRR Case CP12-038, accessed [06/09/20](#)]

Chesapeake Energy Received 67 Lease Suspensions After Paying \$3.3 Million In Penalties For Dodging Royalties

Chesapeake Energy Is An Oil And Gas Company. “We are an independent exploration and production company engaged in the acquisition, exploration and development of properties to produce oil, natural gas and NGL from underground reservoirs.” [SEC EDGAR – Chesapeake Energy 10-K, [02/27/20](#)]

Chesapeake Exploration Has Received 67 Lease Suspensions In Wyoming. [BLM LR2000, accessed [05/15/20](#)]

- **Chesapeake Exploration Is A Subsidiary Of Chesapeake Energy.** [SEC, accessed [05/18/20](#)]

Chesapeake Was Penalized Over \$2 Million For Providing Inaccurate Royalty Information To Interior In 2016. “Chesapeake Energy: Company knowingly maintained \$2,118,900.00 inaccurate information on ONRR’s database pertaining to royalty and/or production reports on two leases for 13 months. Amount: \$2,118,900.” [ONRR Penalty Collections FY2016, accessed [06/15/20](#)]

Chesapeake Was Penalized \$428,400 For Inaccurate Royalty Reporting In 2014. “Chesapeake Energy: Company knowingly or willfully submitted inaccurate royalty report information on two Indian leases for three sales months. Amount: \$428,400.” [ONRR Penalty Collections FY2014, accessed [06/15/20](#)]

Chesapeake Was Penalized \$765,000 For Inaccurate Royalty Reporting In 2014. “Chesapeake Energy: Company knowingly or willfully submitted inaccurate royalty report information on one Federal lease for 15 months. Amount: \$765,000” [ONRR Penalty Collections FY2014, accessed [06/15/20](#)]

Finley Resources Got Royalty Reductions On 12 Different Leases After Cheating On Onshore Royalty Payments From 2010 To 2012

Finley Resources Has Received 13 Separate Royalty Relief Or Lease Suspension Approvals Totaling 37,102 Acres In Utah And Wyoming

- **Finley Resources Has Received One Approved Royalty Rate Reduction To 2.5% In Utah.** The lease covers 5,767 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Finley Resources Has Received One Approved Lease Suspension In Wyoming.** The lease covers 20,000 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Lonesome Oil & Gas Has Received Royalty Relief To 2.5% For 11 Separate BLM Oil & Gas Leases In Utah.** Lonesome’s leases affected by royalty relief affect 11,258.74 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
 - **Lonesome’s New Royalty Rate Is 2.5% For All 11 Leases.** [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
 - **Lonesome Oil & Gas Is A Subsidiary Of Finley Resources.** “Finley Resources, Finley Production and Lonesome Oil & Gas, LLC. (collectively the "Finley Resources Group") own interests in approximately 3,000 wells in thirteen states. Finley Resources now operates over 1,000 of those wells in Texas, Oklahoma, New Mexico, Alabama, Mississippi, North Dakota, Wyoming and Utah. Finley Resources has approximately 100 employees. The company maintains over 100,000 acres of leasehold and mineral interest.” [Finley Resources, accessed [08/09/20](#)]

Finley Resources Was Fined \$81,952 For Failing To Report Production Reports On Its Federal Leases In 2014. Finley Resources, Inc: Company failed to submit production reports for multiple leases and agreements for production months between June 2010 and March 2012.” [ONRR Case CP12-173, accessed [06/08/20](#)]

QEP Resources Got A Reduced Royalty Rate After Falsifying Royalty Reports For 22 Months

QEP Resources Is An Oil And Gas Company. “QEP Resources, Inc. is an independent crude oil and natural gas exploration and production company. The Company focuses on two regions of

the United States: the Northern Region (primarily in North Dakota, Wyoming and Utah) and the Southern Region (primarily in Texas and Louisiana). The Company conducts exploration and production activities in North America's hydrocarbon resource plays." [*Reuters*, accessed [07/15/20](#)]

QEP Resources Had Its Royalty Rate Reduced To 5% On A 160-Acre Public Lands Oil And Gas Lease In Utah. [UTU-064922, accessed [06/22/20](#)]

According To The Office of Natural Resources Revenue, QEP Energy Was Fined \$1,207,800 For "Inaccurate Oil And Gas Volume Information Pertaining To 953 Royalty And/or Production Reports On 35 Leases For As Many As 22 Months." [PENALTY COLLECTIONS FY 2012, accessed [05/28/20](#)]

DOUBLE-DIPPING OIL COMPANIES GOT TAX BENEFITS ON TOP OF ROYALTY RELIEF AND SUSPENDED LEASES FROM THE TRUMP ADMINISTRATION

The Trump Administration Gave Public Land Oil Drillers A Bailout with Royalty Relief And Lease Suspensions After Gifting Them Nearly \$324M In Tax Benefits.

SUMMARY: As the COVID-19 pandemic ravages the economy, the Trump Administration's Bureau of Land Management responded by giving royalty relief and lease suspensions to public lands oil drillers. These backdoor bailouts add to the close to **\$324 million** in tax credits from the CARES Act gifted to four oil and gas companies. These include:

- **\$150 million** in tax credits to an oil and gas company that received royalty reductions on 120 acres of public land
- **\$780,000** in tax credits to an oil and gas company that received lease suspensions on 23,673 acres of public land
- **\$7.6 million** to an oil and gas company with a lease suspension on 840.7 acres of public land
- **\$165.6 million** to an oil and gas company with a royalty rate reduction on 160 acres of public land

The Trump Administration Offered Energy Companies Operating On Public Lands Royalty Relief And Lease Suspensions Through The Bureau Of Land Management

The BLM Offered A COVID-19 Bailout To Public Lands Oil Drillers Through Suspended Leases And Reduced Royalty Rates

The Bureau Of Land Management (BLM) Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. "In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers." [E&E, [05/20/20](#)]

Four Oil & Gas Companies Are Getting A Double-Dip Bailout From The Trump Administration: Massive Tax Benefits On Top Of Royalty Relief And Suspended Public Lands Oil Leases

EOG Resources Got Royalty Rate Reductions On Top Of A Pandemic Tax Break

EOG Resources Got A Royalty Reduction To 0.5% On A Lease In Wyoming.

- **EOG Received A Royalty Reduction To 0.5% On A 120-Acre Public Lands Lease In Wyoming.** [WYW 140806, accessed [06/10/20](#)]

EOG Resources, Formerly Enron, Is One of The Largest Oil Companies In The US. “EOG Resources, Inc. (NYSE:EOG) is one of the largest crude oil and natural gas exploration and production companies in the United States with proved reserves in the United States, Trinidad and China.” [EOG Resources, accessed [06/10/20](#)]

- **EOG Is Formerly A Subsidiary Of Enron.** “Enron Oil & Gas Co. and Enron Corp. split up for good this week. The exploration and production arm of the giant energy and energy services company is now an independent company after the two completed a share exchange. Enron exchanged 62.27 million shares of EOG stock for EOG's China and India operations. And EOG contributed \$600 million in cash to one of its subsidiaries that will remain with Enron.” [*Houston Business Journal*, [08/22/19](#)]

EOG Also Got \$150 Million In Tax Credits As A Result Of The Pandemic. “In response to the economic impacts of the COVID-19 pandemic, the President of the United States signed the Coronavirus Aid, Relief, and Economic Security Act (the CARES Act) into law on March 27, 2020. The CARES Act provides economic support to individuals and businesses through enhanced loan programs, expanded unemployment benefits, and certain payroll and income tax relief, among other provisions. The primary tax benefit of the CARES Act for EOG was the acceleration of approximately \$150 million of additional refundable alternative minimum tax (AMT) credits into tax year 2019. These credits originated from AMT paid by EOG in years prior to 2018 and were reflected as a deferred tax asset and a non-current receivable as of December 31, 2019 since they had been expected to either offset future current tax liabilities or be refunded on a declining balance schedule through 2021. As a result of the CARES Act, EOG has reclassified these credits from a non-current receivable in Other Assets to a current receivable in Income Taxes Receivable on the Condensed Consolidated Balance Sheet at March 31, 2020.” [EOG SEC Form 10-Q, [03/31/20](#)]

Australia-Based Samson Resources Got A Tax Break And 54 Lease Suspensions From The Trump Administration

Samson Resources Is An Oil And Gas Company. “Samson Resources Corp operates as an oil and gas company. The Company explores, develops, and produces oil and natural gas. Samson Resources serves customers in the State of Oklahoma.” [*Bloomberg*, accessed [07/13/20](#)]

- **Samson Resources Is Incorporated In Australia And Has Its Principal Executive Offices In Perth.** [Samson Resources 10-Q, [05/20/20](#)]

Samson Resources Got A \$780,000 Tax Benefit From The CARES Act. “A valuation allowance is provided if it is more likely than not that some portion or all of the deferred tax assets will not be realized. The Company’s ability to realize the benefits of its deferred tax assets will depend on the generation of future taxable income through profitable operations. Due to the Company’s history of losses and the uncertainty of future profitable operations, the Company has recorded a full valuation allowance against its deferred tax assets, except for a tax asset for certain refundable alternative minimum tax (‘AMT’) credit carryforwards. In March 2020, the Coronavirus Aid, Relief, and Economic Security (‘CARES’) Act contains a significant number of provisions that impacted business related to income taxes. One of the changes was to the AMT credit refunds. The CARES Act changed the rules to allow a full refund of any excess credits immediately in 2019. The Company filed its fiscal year end June 30, 2019, tax return and has requested a full refund of its \$780,000 AMT credit. This amount has been classified as a tax receivable in the balance sheet.” [Samson Resources 10-Q, [05/31/20](#)]

Samson Resources Has Received 54 Separate BLM Lease Suspensions Covering 23,673. Acres Of Public Land In Wyoming. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **Of All The Companies Receiving Lease Suspensions, Only One Has Received More Than Samson Resources.** Only Chesapeake Exploration has received more lease suspensions than Samson Resources. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

SM Energy Was Gifted A \$7.6M Tax Benefit And Lease Suspension From The Trump Administration During Coronavirus

SM Energy Is An Oil And Gas Company. “SM Energy Company is an independent energy company that explores for and produces natural gas and crude oil. The Company's operations are focused on The ArkLaTex, Gulf Coast, Mid-Continent, Rocky Mountains, and Permian Basin regions.” [Bloomberg, accessed [07/15/20](#)]

SM Energy Got A Tax Benefit From The CARES Act Of \$7,600,000. “The Coronavirus Aid, Relief, and Economic Security Act (‘CARES Act’) was enacted on March 27, 2020. The primary feature of the CARES Act that the Company will benefit from is the acceleration of its refundable Alternative Minimum Tax (‘AMT’) credits. On April 1, 2020, the Company filed an election to accelerate its remaining refundable AMT credits of \$7.6 million that are expected to be received during the second quarter of 2020.” [SM Energy 10-Q, [05/31/20](#)]

SM Energy Got A Public Lands Oil Lease Suspended.[BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **The 840.7-Acre Lease Is In Converse, Campbell, And Johnson Counties In Wyoming.** 0WYW-185877, accessed [06/22/20](#)]

The Trump Administration Gave QEP Resources A Royalty Rate Reduction On Top Of An Over \$165M Tax Benefit

QEP Resources Is An Oil And Gas Company. “QEP Resources, Inc. is an independent crude oil and natural gas exploration and production company. The Company focuses on two regions of the United States: the Northern Region (primarily in North Dakota, Wyoming and Utah) and the Southern Region (primarily in Texas and Louisiana). The Company conducts exploration and production activities in North America's hydrocarbon resource plays.” [Reuters, accessed [07/15/20](#)]

QEP Resources Got A \$165,600,000 Tax Benefit From The CARES Act. “The tax legislation enacted in December 2017 reduced our federal corporate tax rate from 35% to 21%. In addition, the tax legislation eliminated the corporate Alternative Minimum Tax (AMT), allowing the Company to claim AMT refunds for AMT credits carried forward from prior tax years. The Company received \$73.9 million of AMT credit refunds in 2019. The Coronavirus Aid Relief, and Economic Security Act (CARES Act) enacted in March 2020 permitted the Company to carry back its net operating loss (NOL) generated in 2018, creating additional AMT credits, and accelerate all of its AMT refunds into 2020. The Company now anticipates it will receive \$165.6 million of AMT credit refunds, after carrybacks, in the next 12 months. The AMT credit refunds are included in "Income tax receivable" on the balance sheets as of March 31, 2020.” [QEP Resources, [05/31/20](#)]

- **QEP Energy Is The “Wholly Owned Subsidiary” Of QEP Resources.** [QEP Resources Press Release, [08/23/12](#)]

QEP Resources Had Its Royalty Rate Reduced To 5% On A 160-Acre Public Lands Oil And Gas Lease In Utah. [UTU-064922, accessed [06/22/20](#)]

OIL GIANTS WITH LONG HISTORIES OF ENVIRONMENTAL VIOLATIONS GOT BACKDOOR BAILOUTS FROM THE TRUMP ADMINISTRATION

The Trump Administration Public Land Drillers With Histories Of Corruption, Poor Safety, And \$15.89B In Environmental Violations Royalty Relief And Lease Suspensions On Thousands Of Acres Of Public Land

SUMMARY: As the COVID-19 pandemic ravages the economy, the Trump Administration's Bureau of Land Management responded by giving royalty relief and lease suspensions to public lands oil drillers. Seven recipients of these bailouts had a combined **\$15.89 billion in environmental violation** penalties in addition to fines for **corruption and safety violations**. These include:

- ExxonMobil has **\$1.57 billion** in environmental violations and received royalty reductions on 3,813 acres of public land
- BP was charged **\$14.3 billion** for causing the largest oil spill in history and received royalty reductions and a lease suspension on 2,080 acres of public land
- EOG Resources has been assessed **\$617,724** in environmental penalties and received a royalty reduction on 120 acres of public land
- Chesapeake Energy has paid **\$13.9 million** in environmental violations and a history of corruption and price-fixing. They received 67 lease suspensions.
- Samson Resources has paid **\$101,800** for environmental and workplace safety violations. They received lease suspensions on 23,673 acres of public land.
- Citation has been assessed **\$1.129 million** for Clean Air Act violations and received a lease suspension on 200 acres of public land
- QEP Energy has been fined at least **\$621,000** for environmental violations and was sued for unsafe working conditions. They received royalty relief on 160 acres of public land

The Trump Administration Offered Energy Companies Operating On Public Lands Royalty Relief And Lease Suspensions Through The Bureau Of Land Management

The BLM Offered A COVID-19 Bailout To Public Lands Oil Drillers Through Suspended Leases And Reduced Royalty Rates

The Bureau Of Land Management (BLM) Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. "In all, more than 1,000

applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers.” [E&E, [05/20/20](#)]

The Trump Administration Doled Out Royalty Relief And Lease Suspensions To Seven Companies With Billions In Environments And Safety Violations

ExxonMobil Has Accumulated \$1.57 Billion In Fines Since 2000, Yet The Trump Administration Still Cut Their Royalty Rates

ExxonMobil Got Its Royalty Rate Cut To 0.5% On Three Public Land Leases In Wyoming And North Dakota. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **XTO Energy Got A Royalty Rate Reduction Of 0.5% On A 120-Acre Oil Lease In Wyoming.** [WYW 03472, accessed [06/10/20](#)]
- **XTO Energy Got Two Royalty Rate Reductions To 0.5% On 3,693 Acres Of Public Lands Oil And Gas Leases In North Dakota.** [NDM 032773, accessed [07/08/20](#) and NDM 015753, accessed [07/08/20](#)]
- **XTO Energy Is A Subsidiary Of ExxonMobil.** “XTO became the largest natural gas producer in the United States, with 5.4 percent of all footage drilled in the country in 2009. XTO merged with ExxonMobil, in a deal valued at \$41 billion. This teamed XTO’s expertise and experience in the natural gas business with ExxonMobil’s cutting-edge technologies, financial strength and historic leadership in the global energy industry.” [XTO Energy, accessed [06/10/20](#)]

ExxonMobil, One Of The World’s Largest Corporations, Brags, “We Operate Facilities Or Market Products In Most Of The World’s Countries.” “ExxonMobil, one of the world’s largest publicly traded energy providers and chemical manufacturers, develops and applies next-generation technologies to help safely and responsibly meet the world’s growing needs for energy and high-quality chemical products. Access to energy underpins human comfort, mobility, economic prosperity and social progress. It touches nearly every aspect of modern life. Over the course of its long history of more than a century, ExxonMobil has evolved from a regional marketer of kerosene to an advanced energy and chemical innovator, and one of the largest publicly traded companies in the world. An industry leader in almost every aspect of the energy and chemical manufacturing businesses, we operate facilities or market products in most of the world’s countries, explore for oil and natural gas on six continents, and research and develop next-generation technologies to help meet the dual challenge of fueling global economies while addressing the risks of climate change.” [ExxonMobil, accessed [06/10/20](#)]

ExxonMobil And Its Subsidiaries Have Accumulated \$1,570,595,577 In Penalties Since 2000. Of that total, \$1,523,124,985 was for 304 separate environmental violations. [GoodJobsFirst, accessed [06/12/20](#)]

- ExxonMobil Was Ordered To Pay \$2.03 Million In Civil Penalties For Clean Air Act Violations In 2018.** “The settlement resolves allegations that ExxonMobil violated the Clean Air Act by failing to properly operate and monitor industrial flares at their petrochemical facilities, which resulted in excess emissions of harmful air pollution. The CD will eliminate thousands of tons of harmful air pollution from eight of Exxon's petrochemical manufacturing facilities in Texas and Louisiana. ExxonMobil will spend approximately \$300 million to install and operate air pollution control and monitoring technology to reduce harmful air pollution from 26 industrial flares at five ExxonMobil facilities in Texas, located near Baytown, Beaumont, and Mont Belvieu, and three of the company's facilities in Baton Rouge, Louisiana.” [EPA Case 06-2010-3405, [06/06/18](#)]
- ExxonMobil Was Ordered To Pay \$12 Million In Penalties In 2016 After It Dumped 63,000 Gallons Of Oil Into The Yellowstone River.** “The Departments of Justice and the Interior joined with the state of Montana today to announce a proposed settlement with ExxonMobil Pipeline Company to resolve claims stemming from the July 2011 oil spill into the Yellowstone River. ExxonMobil Pipeline Company has agreed to pay \$12 million in natural resource damages to the federal government and the state of Montana as trustees for the natural resources injured by the spill. A proposed consent decree was filed in federal court today. The state and federal government have also issued a draft restoration plan which sets forth proposed actions to restore the river and wildlife habitat, and improve public lands and recreational resources. [...] On July 1, 2011, a 12-inch diameter Silvertip pipeline owned by ExxonMobil Pipeline Company ruptured near Laurel, Montana, resulting in the discharge of crude oil into the Yellowstone River and floodplain. The discharge is estimated to have been approximately 63,000 gallons (about 1,500 barrels) of oil. The discharge occurred during a high-flow event, affecting approximately 85 river miles and associated floodplain. Oil from the spill, along with the cleanup activities, harmed natural resources including fish and other aquatic life, birds (including migratory birds), wildlife, large woody debris piles, aquatic habitat, terrestrial habitat, recreational use and the services provided by these natural resources. These public natural resources are under Trusteeship of the state of Montana and the U.S. Department of the Interior under the Oil Pollution Act and other laws.” [Department of Justice Press Release, [09/21/16](#)]
- ExxonMobil Had To Pay A \$616,000 Civil Penalty In 2019 After A Refinery Fire Killed Two Employees And Injured Ten Others.** “The U.S. Department of Justice (DOJ) and the U.S. Environmental Protection Agency (EPA) announced a settlement with ExxonMobil Oil Corporation (ExxonMobil) today to resolve federal Clean Air Act claims arising from a 2013 fire at the company’s oil refinery in Beaumont, Texas that killed two employees and injured ten others. In a complaint filed today with the settlement, the United States alleges that the company violated Section 112(r) of the Clean Air Act, which requires measures to prevent accidental releases of extremely hazardous substances that can have serious public health and environmental consequences. [...] Under the consent decree, ExxonMobil will pay a \$616,000 civil penalty, hire an independent third party auditor to conduct a compliance audit of ExxonMobil’s procedures for opening process equipment at ten different process units at the refinery, and perform a supplemental environmental project (SEP) under EPA’s SEP Policy to purchase a hazardous materials Incident Command Vehicle (ICV), valued at \$730,000,

for the Beaumont Fire & Rescue Service (BFRS). The auditor will also evaluate the company's procedures for conducting risk-based mechanical integrity inspections." [EPA Press Release, [03/07/19](#)]

BP Got Royalty Rate Reductions Despite Having Billions In Fines And Causing The Largest Oil Spill In History

BP America Got A Royalty Reduction To 0.5% And A Lease Suspension On Two BLM Leases In Wyoming Covering 2,080 Acres.

- **BP America Production Company Got A Royalty Reduction To 0.5% On A 160-Acre Lease In Wyoming.** [WYW 09754, accessed [06/10/20](#)]
- **BP America Production Company Got A Suspension On A 1,920 Acre Public Land Lease In Wyoming.** [WYW 142974, accessed [06/10/20](#)]

BP Operates In 79 Countries And Has \$278 Billion In Annual Revenues. "We are a global energy business with wide reach across the world's energy system. We have operations in Europe, North and South America, Australasia, Asia and Africa." [BP, accessed [06/10/20](#)]

BP's Deepwater Horizon Oil Spill Was The Largest Oil Spill In History, Killing 11 Workers and Dumping Four Million Of Barrels Of Oil Into The Gulf Of Mexico. "On April 20, 2010, the oil drilling rig Deepwater Horizon, operating in the Macondo Prospect in the Gulf of Mexico, exploded and sank resulting in the death of 11 workers on the Deepwater Horizon and the largest spill of oil in the history of marine oil drilling operations. 4 million barrels of oil flowed from the damaged Macondo well over an 87-day period, before it was finally capped on July 15, 2010. On December 15, 2010, the United States filed a complaint in District Court against BP Exploration & Production and several other defendants alleged to be responsible for the spill." [EPA, accessed [06/14/20](#)]

- **BP Was Charged An Unprecedented \$5.5 Billion In Clean Water Act Violations And Up To \$8.8B In Damages.** "This webpage provides information and materials on EPA's enforcement response to the Deepwater Horizon Oil Spill, settlements with several of the defendants, including the record-setting settlement with BP Exploration & Production for an unprecedented \$5.5 billion Clean Water Act penalty and up to \$8.8 billion in natural resource damages." [EPA, accessed [06/14/20](#)]

BP Agreed To Pay A \$102 Million Settlement In 2018 After Years Of Overcharges To The State Of California. "California Attorney General Xavier Becerra today announced a \$102 million settlement with BP Energy Company and affiliates (BP) over allegations that it intentionally overcharged the State of California for natural gas that the State purchased under three successive contracts from March 2003 to August 2012. The contracts allowed the California Department of General Services, which buys natural gas for numerous state agencies and political subdivisions, to cap the price it would pay BP for specific volumes of gas. BP regularly quoted and charged the State of California prices that violated this cap and concealed its overpricing by providing false and misleading information. These acts constitute violations of the California False Claims Act. 'BP thought it could get away with providing false and

misleading information in order to line its own pockets. Today, we send a clear message: cheating the People of California will cost you more than it's worth,' said Attorney General Becerra. 'My Office is committed to holding accountable those who unscrupulously put profits ahead of people.'" [California Attorney General Press Release, [01/11/18](#)]

BP Agreed To Pay A Penalty Of \$3,450,000 For Clean Air Act Violations At Texas Refineries In 2016. "On November 4, 2013, the Court entered the Ninth Amendment to the Refinery Initiative Consent Decree in this matter. The Ninth Amendment transfers the Consent Decree's obligations for the Texas City Refinery from BP Products to Blanchard Refining Company LLC, a wholly owned subsidiary of Marathon Petroleum Company. Blanchard recently purchased the refinery. The Ninth Amendment requires Blanchard to perform approximately \$190 million in corrective actions to fix Clean Air Act and RCRA violations that BP committed at the refinery before it was sold. BP must pay a penalty of \$950,000. On April 1, the Court entered our modification of the Ninth Amendment to BP's 2001 refinery initiative consent decree. The modification extends several of the Ninth Amendment's deadlines for completing work to upgrade the Texas City refinery's wastewater treatment system. Blanchard (a subsidiary of Marathon) bought the refinery from BP in 2013 and agreed to undertake a variety of projects to fix historical RCRA and Clean Air Act NSPS QQQ compliance issues involving the wastewater treatment system. However, Blanchard encountered circumstances that it asserts amount to force majeure and, therefore, requested an extension of time." [EPA Civil Enforcement Case 06-2000-0910, [04/01/16](#)]

A Former Enron Subsidiary Has Been Assessed \$617,724 In Environmental Penalties. It Still Was Given A Royalty Reduction From The Trump Administration

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- **EOG Received A Royalty Reduction To 0.5% On A 120-Acre Public Lands Lease In Wyoming.** [WYW 140806, accessed [06/10/20](#)]

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EOG Resources Has Been Assessed \$617,724 In Environmental Penalties Since 2004. [Violation Tracker, accessed [06/15/20](#)]

EOG Was Assessed \$477,000 In Penalties Under The Clean Air Act For Failing To Obtain

Permits Before Construction Of Stationary Sources. “THIS AMENDED ADMINISTRATIVE COMPLAINT AND CONSENT AGREEMENT IS ISSUED TO EOG RESOURCES FOR CONSTRUCTING MAJOR STATIONARY SOURCES WITHOUT FIRST OBTAINING A PSD PERMIT. THESE SOURCES ARE LOCATED WITHIN THE EXTERIOR BOUNDARIES OF THE FORT BERTHOLD RESERVATION.” [EPA Civil Enforcement Case 08-2011-0163, [06/09/12](#)]

Bankrupt Chesapeake Exploration Got 67 Lease Suspensions Despite Paying Millions For Corruption, Safety Failures, And Environmental Violations

Chesapeake Energy, An Oil And Gas Producer, Filed For Bankruptcy On June 28, 2020.

“Chesapeake Energy Corp (CHK.N) filed for Chapter 11 on Sunday, becoming the largest U.S. oil and gas producer to seek bankruptcy protection in recent years as it bowed to heavy debts and the impact of the coronavirus outbreak on energy markets.” [Reuters, [06/28/20](#)]

Chesapeake Exploration Received 67 Lease Suspensions In Wyoming. [BLM LR2000, accessed [05/15/20](#)]

- **Chesapeake Exploration Is A Subsidiary Of Chesapeake Energy.** [SEC, accessed [05/18/20](#)]

Chesapeake Energy Has Been Assessed \$13,889,964 For 14 Environmental Violations Since 2000. [Violation Tracker, accessed [05/18/20](#)]

- **Chesapeake Paid \$6.5 Million In Clean Water Act Penalties After It Was Caught Dumping Waste At 27 Separate Sites, Impacting Streams And Wetlands.** “The U.S. Environmental Protection Agency and the Department of Justice announced that Chesapeake Appalachia, LLC, a subsidiary of Chesapeake Energy, the nation’s second largest natural gas producer, will spend an EPA-estimated \$6.5 million to restore 27 sites damaged by unauthorized discharges of fill material into streams and wetlands and to implement a comprehensive plan to comply with federal and state water protection laws at the company’s natural gas extraction sites in West Virginia, many of which involve hydraulic fracturing operations.” [EPA, [12/19/13](#)]

Chesapeake Paid A \$25 Million Penalty In Michigan After It Conspired With Another Oil Company To Avoid Bidding Wars In 2015. “Chesapeake Energy Corp. agreed to pay \$25 million to a victims compensation fund in settlement of allegations it conspired with Encana Oil & Gas to avoid bidding wars for Michigan oil and gas leases. It also pleaded guilty to one count of attempted antitrust violations, a misdemeanor, and one count of false pretenses, a misdemeanor. Criminal sentencing was suspended on condition of abiding by settlement terms. Encana settled the allegations against it in 2014.” [Violation Tracker, accessed [05/18/20](#)]

- **Chesapeake’s \$25 Million Civil Penalty Was Paid After A Racketeering Complaint.** “Michigan Attorney General Bill Schuette and Michigan Department of Natural Resources (DNR) Director Keith Creagh today announced that the state has reached a \$25 million civil settlement with Oklahoma-based energy company Chesapeake Energy Corporation. This settlement resolves allegations the company conspired with Calgary-based Encana Oil & Gas to avoid bidding wars against each other in Michigan public

auctions for oil and gas leases that caused lease prices to plummet in October 2010. This settlement also addresses complaints that Chesapeake defrauded hundreds of private citizens by fraudulently cancelling their oil and gas leases in 2010. Schuette previously reached a \$5 million settlement agreement with Encana in May 2014. [...] A \$25 million victims' compensation fund will be established and every victim listed in the state's Racketeering complaint will be paid back 100% of their losses and attorney fees." [State of Michigan, [04/24/15](#)]

In 2016, Chesapeake Energy's Former CEO Aubrey McClendon Was Charged With Rigging Bids For Oil And Gas Leases In Oklahoma After A 4-Year Antitrust Probe. "Aubrey McClendon, former chief executive officer of Chesapeake Energy Corp (CHK.N) and a legend in the U.S. energy industry, was charged on Tuesday with conspiring to rig bids to buy oil and natural gas leases in Oklahoma, the Justice Department said. [...] The indictment follows a nearly four-year federal antitrust probe that began after a 2012 Reuters investigation found that Chesapeake had discussed with a rival how to suppress land lease prices in Michigan during a shale-drilling boom. Although the Michigan case was subsequently closed, investigators uncovered evidence of alleged bid-rigging in Oklahoma." [[Reuters](#), 03/01/16]

- **The Indictment Claimed Aubrey McClendon Colluded With 2 Energy Companies To Not Bid Against Each Other From 2007 To 2012.** "The seven-page indictment alleges that McClendon set up a conspiracy of two energy companies which agreed not to bid against each other in purchasing oil and natural gas leases in northwest Oklahoma from 2007 to 2012. The indictment did not name either company." [[Reuters](#), 03/01/16]

Chesapeake Energy Was Sued In 2016 For "Conspiring To Depress The Market" For Oil And Gas Leases In Kansas And Other States. "Investors who sold oil and natural gas land leases to Chesapeake Energy Corp and now-bankrupt SandRidge Energy Corp sued Chesapeake and Tom Ward, SandRidge's former CEO, alleging that they conspired to depress the market for those leases. [...] Chisholm alleged Chesapeake and SandRidge divided the area covering the Anadarko Basin in Kansas and other states and agreed not to compete, which drove down prices for the leases." [[Reuters](#), 07/19/16]

- **SandRidge's Former CEO Who Also Faced Charged In This Case Was A Cofounder Of Chesapeake Energy** "Chisholm said in the complaint that many believe the other unnamed co-conspirators were Chesapeake, SandRidge and Ward. Before Ward founded SandRidge in 2006, he co-founded Chesapeake with McClendon in 1989." [[Reuters](#), 07/19/16]

On January 12, 2007, Chesapeake Energy Was Fined \$30,000 For A "Labor Relations Violation." [Violation Tracker Individual Record - [Chesapeake Energy](#), accessed 05/28/20]

On June 14, 2012, Chesapeake Energy Subsidiary Chesapeake Appalachia LLC Was Fined \$250,000 For A "Consumer-Protection-Related Violation." [Violation Tracker Individual Record - [Chesapeake Appalachia LLC](#), accessed 05/28/20]

On February 24, 2011, Chesapeake Energy Subsidiary Chesapeake Operating Inc Was Fined \$12,000 For A “Workplace Safety Or Health Violation.” [Violation Tracker Individual Record - [Chesapeake Operating Inc](#), accessed 05/28/20]

On November 16, 2011, Chesapeake Energy Subsidiary Chesapeake Operating Inc Was Fined \$7,000 For A “Workplace Safety Or Health Violation.” [Violation Tracker Individual Record - [Chesapeake Operating Inc](#), accessed 05/28/20]

On January 31, 2013, Chesapeake Energy Subsidiary Chesapeake Operating Inc Was Fined \$13,627 For A “Workplace Safety Or Health Violation.” [Violation Tracker Individual Record - [Chesapeake Operating Inc](#), accessed 05/28/20]

Samson Resources Got Royalty Relief On 23,673 Acres Of Public Land Despite A History Of Environmental And Safety Violations

Samson Resources Is An Oil And Gas Company. “Samson Resources Corp operates as an oil and gas company. The Company explores, develops, and produces oil and natural gas. Samson Resources serves customers in the State of Oklahoma.” [Bloomberg, accessed [07/13/20](#)]

Samson Resources Has Received 54 Separate BLM Lease Suspensions Covering 23,673. Acres Of Public Land In Wyoming. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **Of All The Companies Receiving Lease Suspensions, Only One Has Received More Than Samson Resources.** Only Chesapeake Exploration has received more lease suspensions than Samson Resources.[BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Samson Resources Agreed To Pay Penalties Of \$75,000 For Environmental Violations To The EPA In 2013. EPA says that Samson Resources failed to obtain a permit before building a facility in Colorado and “numerous other violations” in 2013. “RESPONDENT FAILED TO OBTAIN A PSD PERMIT FOR THE FACILITY BEFORE BEGINNING CONSTRUCTION; FAILED TO SUBMIT NOTICE OF SUBPART ZZZZ; FAILURE TO SUBMIT A NOTICE OF COMPLIANCE; AND NUMEROUS OTHER VIOLATIONS.” [EPA Civil Enforcement Case 08-2013-0137, accessed [06/08/20](#)]

Samson Resources Had To Pay Civil Penalties Of \$12,100 After It Was Caught Spilling Produced Water In Colorado. [EPA Civil Enforcement Case 08-2015-0108, accessed [06/08/20](#)]

- **Samson’s Spill Resulted In Discharges Of Pollutants Into The Beaver Creek On The Southern Ute Reservation.** “On October 20, 2014, the U.S. Environmental Protection Agency (EPA) received a report from the National Response Center of a produced water spill on the Southern Ute Reservation from a pipeline owned and operated by Samson Resources. Samson Resources reported a discharge of approximately 100 barrels of produced water as a result of a corroded pipeline. Approximately 15 barrels of the spilled produced water went into Beaver Creek in the Southern Ute Reservation. Copies of photos provided to the EPA by the Southern Ute Indian Tribe Environmental

Programs Division, suggest discharges of pollutants into the Beaver Creek may have occurred in connection with the spill resulting from the corrosion of a pipeline.” [EPA Civil Enforcement Case 08-2015-0108, accessed [06/08/20](#)]

Samson Resources Had To Pay \$19,800 In Penalties After OSHA Found Four “Serious” Safety Violations At Its Oil & Gas Wells In Wyoming. [OSHA, accessed [06/08/20](#)]

Samson Resources Had To Pay \$7,000 In Penalties After OSHA Found A “Serious” Safety Violations At One Of Its Worksites In Colorado. [OSHA, accessed [06/08/20](#)]

Citation Got A Lease Suspensions Despite A History Of Clean Water Act Violations - Including A Violation As Recent As March 2020

Citation 2002 Investment Received A Lease Suspension On A 200-Acre Public Lands Oil And Gas Lease In Wyoming. The lease covers 200 acres of public land. [WYW 055076, accessed [06/09/20](#)]

- **Citation 2002 Investment Is Located At 14077 Cutten Road In Houston, Texas.** [WYW 055076, accessed [06/09/20](#)]
- **14077 Cutten Road Is The Address Of The Citation Oil And Gas.** [Citation Oil & Gas, accessed [06/09/20](#)]

Citation Oil & Gas Is One Of The Largest Privately-Held Oil Companies In The United States. “Citation Oil & Gas Corp. is one of the largest privately-held independent oil & gas acquisition, development and production companies in the United States. Founded in 1981 by Forrest E. Harrell, Sr., Citation has built a significant portfolio of mature, long-life producing properties through a combination of disciplined acquisitions, focused operations and subsequent development. Since 1985, Citation has invested \$2.1 billion in over 80 oil and gas reserve acquisitions. As a result of these acquisitions and subsequent property development, Citation now has ownership interests in approximately 15,600 wells in over 400 separately designated fields that contain over 216 million net equivalent barrels of proved reserves, and has net production of approximately 27,150 barrels of oil and 32 million cubic feet of gas per day. Citation’s reserves are 88% oil and 76% are proved developed and have a reserve life index of 18 years.” [Citation Oil & Gas, accessed [06/09/20](#)]

Citation Was Assessed Civil Penalty Of \$115,000 In March 2020 For Clean Water Act Violations In Park County, Wyoming. “The U.S. Environmental Protection Agency (EPA) today announced a proposed settlement with Citation Oil & Gas Corp. (Citation) of Houston, Texas, to resolve alleged violations of federal regulations intended to prevent oil pollution. The Clean Water Act violations pertain to oil spill prevention requirements and Spill Prevention, Control, and Countermeasure (SPCC) regulations at Citation’s Park County, Wyoming, oil production facilities. Citation will pay a civil penalty of \$115,000 to resolve the alleged violations.” [EPA Press Release, [03/28/20](#)]

- **Citation Dumped 300 Barrels Of Crude Oil And 1,000 Barrels Of Produced Water Into A Tributary Of The Big Horn River.** “This proposed settlement resulted from EPA’s

investigation of two spills at Citation facilities. The first spill occurred on February 9, 2016, when Citation released approximately 300 barrels of crude oil from its Embar 3 Facility into Buffalo Creek, a tributary of the Big Horn River. The second spill occurred on August 21, 2019, when Citation released approximately 1000 barrels of produced water from its North Waterflood Station into the same tributary." [EPA Press Release, [03/28/20](#)]

Citation Paid \$22,125 In Violations For Clean Air Act Violations At Its East Fitts Unit In Oklahoma In 2018. [EPA Civil Enforcement Case Report, [07/24/18](#)]

Citation Paid \$70,000 In Penalties In 2016 For Clean Air Act Violations Involving Sulfur Dioxide At Its Healdton Gas Plant In Oklahoma. [EPA Civil Enforcement Case Report, [10/18/16](#)]

Citation Had To Pay \$10,000 In Penalties Under The Clean Water Act For Unauthorized Discharges At Its Healdton Gas Plant In Oklahoma. "In 2015, EPA Region 6 issued an Administrative Complaint (APO) under its authority pursuant to Section 309 of the Clean Water Act (CWA) to Citation Oil & Gas Corp (Respondent), located in Carter County, Oklahoma. The APO was issued in response to violation of Section 301 of the CWA for discharging fluids high in Total Dissolved Salts to waters of the U.S. The APO proposes that Respondent pay a penalty. Respondent must respond to EPA Region 6 within thirty days of receipt of the Complaint." [EPA Civil Enforcement Case Report, [04/09/15](#)]

Citation Had To Pay \$26,000 In Clean Water Act Penalties For A Discharge Of Produced Wastewater At Its Healdton Field IV Facility In Oklahoma In 2014. "The Respondent is Citation Oil & Gas Corp. Violations were identified as the result of an inspection and a 308 Information Request response. The inspection was conducted but the Environmental Protection Agency (EPA) on June 30, 2013 at the facility located in Carter County, Oklahoma. The response to the 308 Information Request was received by the EPA on October 17, 2013, and was in reference to National Response Center incident report number 1050496. The violations alleged are for the unauthorized discharge of oil field brine and produced wastewater, to waters of the United States." [EPA Civil Enforcement Case Report, [07/08/14](#)]

Citation Had To Pay \$18,000 In Clean Water Act Violations For Discharging Produced Wastewater At Three Oklahoma Locations In 2013. "On February 11, 2013, EPA Region 6 issued an Administrative Complaint (Complaint) under its authority pursuant to Section 309 of the Clean Water Act (CWA) to Citation Oil & Gas Corp., located in Healdton, Oklahoma. The Complaint was issued in response to violation of Section 301 of the CWA for an unauthorized discharge of oil field brine and produced wastewater to a water of the U.S. The Complaint proposes that Citation Oil & Gas Corp. pay a penalty. Citation Oil & Gas Corp. must respond to EPA Region 6 within 30 days of receiving the Complaint." [EPA Civil Enforcement Case Report, [02/25/13](#)]

Citation Had To Pay \$8,000 In Clean Water Act Violations In 2011 After Dumping 20 Barrels Of Crude Oil Into A Tributary Of The Yellowstone River In Montana. "This complaint and settlement agreement is issued to citation oil and gas corporation for placing booms in the spill area and remediated spill-stained shorelines on June 11th and 12th 2009. Respondent

discharged approximately 20 barrels of crude oil into its secondary containment which overflowed and allowed oil to travel approximately 2,200 feet and enter cabin creek a tributary to the Yellowstone River.” [EPA Civil Enforcement Case Report, [09/19/11](#)]

Citation Paid A Total \$860,000 In Penalties Related To Clean Water Act Violations In Wyoming In 2009. “Citation Oil and Gas Corp. will invest approximately \$580,000 on new and upgraded spill prevention controls at its Cellers Ranch production field in Johnson County, Wyo., and pay a \$280,000 penalty to resolve the government’s claims for violations of the Clean Water Act. The U.S. Environmental Protection Agency and U.S. Department of Justice announced the agreement on January 7 under a consent decree lodged in the United States District Court for the District of Wyoming.” [EPA Press Release, [01/08/09](#)]

- **Citation Dumped More Than 25,000 Gallons Of Crude, Which Made Its Way Into The North Fork Powder River In Wyoming.** “The agreement resolves a discharge of more than 25,000 gallons (597 barrels) of crude oil and produced water at Citation's Cellers Ranch Unit and inadequacies in the company's Spill Prevention Control and Countermeasure (SPCC) plan, an oil pollution prevention requirement under the Clean Water Act. On June 19, 2004, a flow line ruptured at Cellers Ranch, resulting in a spill that contaminated six miles of the North Fork Powder River and adversely impacted waterfowl and other wildlife. The spill was caused by corroded bolts on a buried coupling.” [EPA Press Release, [01/08/09](#)]
- **The Spill Partially Coated The River’s Bank And Harmed Wildlife And Soil.** “The spill at the Cellers Ranch field discharged 25,074 gallons of oil into nearby soils and waters, impacting wildlife, habitat and vegetation. The spill partially coated the banks of the North Fork Powder River and soaked at least eighteen Canada Geese, one Mallard duck and several beaver.” [EPA Press Release, [01/08/09](#)]

QEP Energy Has Been Fined At Least \$621,000 For Environmental Violations On Top Of Their Safety Failures. The Oil And Gas Company Still Got A Royalty Reduction From The Trump Administration.

QEP Resources Is An Oil And Gas Company. “QEP Resources, Inc. is an independent crude oil and natural gas exploration and production company. The Company focuses on two regions of the United States: the Northern Region (primarily in North Dakota, Wyoming and Utah) and the Southern Region (primarily in Texas and Louisiana). The Company conducts exploration and production activities in North America's hydrocarbon resource plays.” [Reuters, accessed [07/15/20](#)]

According To The Bureau Of Land Management, QEP Energy Is Having Its Royalties Reduced On 160 Acres Of Land In Utah. [UTU 064922, accessed [05/28/20](#)]

QEP Energy Has Been Fined At Least \$621,000 For Environmental Violations By The Environmental Protection Agency.

- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On June 28th, 2013, Resulting In A \$150,000 Penalty.** [EPA Civil Enforcement Case Report For 06-2013-2716, accessed [05/28/20](#)]
- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On August 29th, 2011, Resulting In A \$126,000 Penalty.** [EPA Civil Enforcement Case Report For 08-2011-0160, accessed [05/28/20](#)]
- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On February 21st, 2015, Resulting In A \$117,150 Penalty.** [EPA Civil Enforcement Case Report For 06-2015-2702, accessed [05/28/20](#)]
- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On September 30th, 2010, Resulting In A \$89,798 Penalty.** [EPA Civil Enforcement Case Report For 08-2010-0222, accessed [05/28/20](#)]
- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On February 21st, 2015, Resulting In A \$45,521 Penalty.** [EPA Civil Enforcement Case Report For 06-2015-2703, accessed [05/28/20](#)]
- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On May 6th, 2011, Resulting In A \$35,000 Penalty.** [EPA Civil Enforcement Case Report For WY000A0000560370017000006, accessed [05/28/20](#)]
- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On February 12th, 2010, Resulting In A \$33,000 Penalty.** [EPA Civil Enforcement Case Report For WY000A0000560350009600004, accessed [05/28/20](#)]
- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On June 12th, 2012, Resulting In A \$17,850 Penalty.** [EPA Civil Enforcement Case Report For CO000A0000080330001300013, accessed [05/28/20](#)]
- **According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On December 2nd, 2013, Resulting In A \$7,000 Penalty.** [EPA Civil Enforcement Case Report For WY000A0000560350034700005, accessed [05/28/20](#)]

According To The United States Department Of Labor's Occupational Safety and Health Administration, QEP Energy Had Two Safety Violations On November 1st, 2016, Resulting In A \$6,000 Fine. [Inspection: 1152829.015 - Qep Energy Company, accessed [05/28/20](#)]

In December 2011, QEP Energy Was Sued After Rig Components Failed And Exploded.
 "This civil action is commenced in consequence of the death of Kyle L. Rooke, a husband and father who was killed on January 5, 2011 on a drilling rig in Sublette County, Wyoming. Components of the rig system failed and exploded. The ensuing fire engulfed Mr. Rooke and he

was burned to death. [...] The actions of the defendants---in failing to provide a safe place to work---were undertaken in spite of the defendants' knowledge that Wyoming's workplace fatality rate has been a multiple of the national fatality rate and that Wyoming has been ranked as the least safe state for workers amongst all fifty (50) states for most of the past decade. Rather than those facts being a mandate to focus vigilant and transformative safety practices, the defendants recklessly neglected safety and risked further loss of human life." [[2:2011cv00377](#): Rooke v. QEP Energy Company et al, accessed 05/28/20]

BERNHARDT SAYS HE WILL PERSONALLY REVIEW OFFSHORE OIL DRILLERS' REQUESTS FOR CORONAVIRUS BAILOUTS

Though The Trump Administration Has So Far Declined To Offer Special Royalty Relief To Offshore Oil Companies, A Handful Of Companies Have Still Applied Through A Process That Lacks Transparency

SUMMARY: Despite the Trump Administration's reluctance to give offshore oil producers royalty relief during the COVID-19 pandemic, offshore oil companies are still applying for relief. Their continued efforts are bolstered assurances from Interior Secretary David Bernhardt to personally oversee their applications and refusal by the Interior Department to disclose which companies have applied for royalty relief.

The Trump Administration Is Offering No Blanket Program To Help Offshore Oil Producers, But Interior Secretary David Bernhardt Said He Would "Personally" Oversee Applications Through The Existing Process

The BLM Offered A COVID-19 Bailout To Public Lands Oil Drillers Through Suspended Leases And Reduced Royalty Rates...

The Bureau Of Land Management (BLM) Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. "In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers." [E&E, [05/20/20](#)]

...But The Trump Administration Has Been Reluctant To Grant Offshore Oil Producers Any Special Royalty Relief During The Coronavirus Pandemic

Interior Has Declined To Offer Any Blanket Royalty Relief To Offshore Oil And Gas Producers. "U.S. oil and gas producers face financial challenges stemming from demand reduction, oversupply, and commodity price drops during the COVID-19 pandemic. Some Members of Congress have asked the Department of the Interior (DOI) to offer royalty relief on federal oil and gas leases – a temporary reduction or waiver of the royalties that companies pay the federal government on production from these leases. Some other Members have opposed a comprehensive royalty relief program for federal oil and gas producers. DOI has stated that affected producers may apply for royalty relief individually using existing options, clarifying

that the Department does not plan to pursue a new program of blanket royalty relief at this time.” [Congressional Research Service, [05/13/20](#)]

But Interior Did Offer Guidance For “Special Case Royalty Relief” Under Existing Processes.

“On April 30, 2020, BSEE posted new guidance for producers on special case royalty relief. Applicants are to follow standard application procedures as outlined in BSEE regulations. The April 2020 guidance states that, ‘while past special case applications were for leases or projects that included the drilling of a well(s), BSEE envisions applications on a lease or unit basis will be pursued where no drilling will be included.’” [Congressional Research Service, [05/13/20](#)]

Offshore Oil Companies Are Not Happy

The Offshore Industry Complains That The Existing Process Is “So Complicated.” “Similar royalty relief guidance was provided for offshore operators by the Interior's Bureau of Safety and Environmental Enforcement. Experts and industry representatives said the offshore guidance was so complicated as to offer little relief during the pandemic. Only two royalty relief requests for offshore operators have been approved since BSEE's formation in 2011.” [E&E, [05/20/20](#)]

The Oil Industry Wants A Broader Royalty Relief Bailout, Either Through A Comprehensive Initiative Or An Expedited Version Of The Current Process. “Some stakeholders reportedly have expressed dissatisfaction with BSEE's guidance and, more generally, with DOI's reliance on existing procedures for seeking royalty relief during the pandemic. They have sought more comprehensive royalty relief initiatives, or measures to expedite the individual application process, which is complex and involves multiple steps (as shown in a February 2020 BSEE flowchart [slide 19]). They contend that more rapid royalty relief could help producers avoid having to shut in wells for financial reasons and that royalty relief generally would have fewer market-distorting effects than some other proposals to aid the sector.” [Congressional Research Service, [05/13/20](#)]

So The Industry's Allies In Congress Are Also Asking For Special, Broad Royalty Relief.

“Offshore oil producers and their allies in Congress are asking the Trump administration to make it easier for them to get a break on payments to the government amid the coronavirus pandemic. Drillers working in the Gulf of Mexico argue they have been left high and dry during a historic rout in oil markets that saw the price per barrel briefly plummet below \$0.” [Washington Post, [05/22/20](#)]

- **Sixty Members Of Congress Signed A Letter Asking To Implement Oil Industry-Friendly Reforms For Royalty Relief.** “Sixty members of Congress also are urging the Trump administration to change its formula for counting a well's expenses. ‘While the current process is a good first step, we would like to work with you to implement these additional reforms to help keep businesses afloat,’ they wrote to Interior Secretary David Bernhardt on Thursday.” [Washington Post, [05/22/20](#)]

But So Far, Interior Has Stood Its Ground. “These laws and regulations have existed for decades and across multiple administrations,” spokesman Nicholas Goodwin said by email, when asked about the House letter. ‘The Bureau of Land Management and the Bureau of Safety

and Environmental Enforcement each have separate, longstanding regulations that provide for the processing of applications for royalty relief.’ The department, he added, ‘has not authorized royalty relief beyond these preexisting processes.’” [Washington Post, [05/22/20](#)]

Offshore Oil Companies Are Applying For Royalty Relief Anyway, And Have Assurance From David Bernhardt That He Will “Personally” Oversee Their Applications

In April, Only One Company Had Applied For Offshore Royalty Relief. “The U.S. Interior Department said on Wednesday that one oil company had begun the process of requesting relief from royalty payments on its offshore production as the industry reels from slumping prices. Lawmakers representing U.S. Gulf Coast states have asked Interior Secretary David Bernhardt to cut the royalty rate oil and gas companies must pay on their offshore drilling operations temporarily to counter the fallout of the coronavirus pandemic, which has reduced demand for fuel and crushed prices. Department of Interior spokesman.” [Reuters, [04/08/20](#)]

By May 22nd, That Number Had Increased To Four. “Given the hurdles, only four offshore producers have begun the process of applying for royalty relief, according to the Interior Department, which manages both on- and offshore oil and gas leasing. None have yet received it. The bureaucratic tangle for offshore producers comes even as President Trump has promised aid for the domestic oil sector, which is ailing as driving, flying and industrial activity have been severely curtailed to stop the spread of the virus.” [Washington Post, [05/22/20](#)]

Interior Secretary David Bernhardt Said That He Would ‘Personally’ See That Applications Are Processed Without Delays. “The U.S. Department of the Interior thus far has directed struggling producers to apply for relief using an existing system under the Bureau of Safety and Environmental Enforcement. That case-by-case process has been criticized by the industry as onerous and lengthy. Cassidy said he had heard from one producer who had been seeking royalty relief for two years. Bernhardt assured Cassidy that he would ‘personally’ see that applications were processed without delays, Cassidy said.” [Reuters, [04/22/20](#)]

- **David Bernhardt Was Formerly A Lobbyist For The National Ocean Industries Association, A Trade Group That Represents Offshore Oil Companies.** “The National Ocean Industries Association is a trade and lobbying group for the offshore oil and gas industry. Bernhardt represented NOIA as a lobbyist. According to a presentation outlining the offshore industry’s policy goals from 2017, NOIA has been remarkably successful. Top officials from the DOI have met at least 12 times with NOIA.” [Documented, [03/27/19](#)]
- **NOIA’s Leadership Has Enjoyed Increased Access To Interior Since Bernhardt Joined The Trump Administration.** “In an April 2017 meeting between NOIA leaders and DOI staff, NOIA’s first topic of business was ‘Increased access to the OCS,’ highlighting that 94% was ‘off limits to oil and natural gas exploration.’ At the direction of Bernhardt, the DOI is presently planning on opening large portions of previously restricted tracts in the Atlantic to oil and gas exploration. NOIA President Randall Luthi has ready access to Bernhardt’s staff; he is the Co-Director of DOI’s Royalty Policy Committee, which

recommended lowering offshore royalty rates. Luthi was present for at least 4 of the 12 meetings between DOI and NOIA. A 2013 NOIA report pictures Bernhardt alongside Luthi, Dick Cheney, and other influential supporters of the fossil fuel industry at NOIA's fall meeting. Luthi and Bernhardt were presenters at a 2011 NOIA meeting where Bernhardt 'provided insight on the use of NEPA and the ESA as a litigation tool.' Luthi applauded Bernhardt's nomination to Secretary of the Interior." [Documented, [03/27/19](#)]

Interior Has Not Disclosed Which Companies Have Applied For Offshore Royalty Relief

Interior Refused To Identify Companies That Have Applied For Royalty Relief "The U.S. Interior Department said on Wednesday that one oil company had begun the process of requesting relief from royalty payments on its offshore production as the industry reels from slumping prices. Lawmakers representing U.S. Gulf Coast states have asked Interior Secretary David Bernhardt to cut the royalty rate oil and gas companies must pay on their offshore drilling operations temporarily to counter the fallout of the coronavirus pandemic, which has reduced demand for fuel and crushed prices. Department of Interior spokesman Nicholas Goodwin said the Bureau of Safety and Environmental Enforcement, which processes royalty relief requests for offshore drilling, had thus far received just one 'pre-application letter.' He did not name the company." [Reuters, [04/08/20](#)]

But It's Possible That Once Applications Are Approved Or Denied, They Will Be Posted Online. [BSEE, accessed [05/26/2020](#)]

COMPANIES

QEP ENERGY

The Trump Administration Allowing QEP Energy To Double Dip In Corporate Bailouts, Giving More Than \$165 Million In Tax Credit Refunds And Royalty Reductions, Despite QEP Having More Than \$1.8 Million Dollars In Federal Fines For Various Violations

QEP Energy Parent Company QEP Resource Anticipated It Would Receive \$165.6 Million In Alternative Minimum Tax Credit Refunds Through The CARES Act

QEP Resources Also Noted Its Federal Corporate Tax Rate Would Be Reduced From 35% To 21%.

QEP Resources Announced In Its 10-Q That It Expected To Receive \$165.6 Million In AMT Credit Refunds. "The tax legislation enacted in December 2017 reduced our federal corporate tax rate from 35% to 21%. In addition, the tax legislation eliminated the corporate Alternative Minimum Tax (AMT), allowing the Company to claim AMT refunds for AMT credits carried forward from prior tax years. The Company received \$73.9 million of AMT credit refunds in 2019. The Coronavirus Aid Relief, and Economic Security Act (CARES Act) enacted in March 2020 permitted the Company to carry back its net operating loss (NOL) generated in 2018, creating additional AMT credits, and accelerate all of its AMT refunds into 2020. The Company now anticipates it will receive \$165.6 million of AMT credit refunds, after carrybacks, in the next 12 months. The AMT credit refunds are included in "Income tax receivable" on the balance sheets as of March 31, 2020." [QEP Resources 10-Q, [04/29/20](#)]

- QEP Energy Is The "Wholly Owned Subsidiary" Of QEP Resources. [QEP Resources Press Release, [08/23/12](#)]

QEP Energy Is Also Getting Royalty Reductions On Its Bureau Of Land Management Leases

According To The Bureau Of Land Management, QEP Energy Is Having Its Royalties Reduced On 160 Acres Of Land In Utah. [UTU 064922, accessed [05/28/20](#)]

QEP Energy Has Been Fined More Than \$1.8 Million Dollars For Various Environmental, Workplace Safety And Leasing Royalty Violations

QEP Energy Has Been Fined At Least \$1,207,800 For Inaccurate Oil And Gas Volume Reports By The Office Of Natural Resources Revenue.

According To The Office Of Natural Resources Revenue, QEP Energy Was Fined \$1,207,800 For "Inaccurate Oil And Gas Volume Information Pertaining To 953 Royalty And/or

Production Reports On 35 Leases For As Many As 22 Months.” [PENALTY COLLECTIONS FY 2012, accessed [05/28/20](#)]

QEP Energy Has Been Fined At Least \$621,000 For Environmental Violations By The Environmental Protection Agency.

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On June 28th, 2013, Resulting In A \$150,000 Penalty. [EPA Civil Enforcement Case Report For 06-2013-2716, accessed [05/28/20](#)]

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On August 29th, 2011, Resulting In A \$126,000 Penalty. [EPA Civil Enforcement Case Report For 08-2011-0160, accessed [05/28/20](#)]

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On February 21st, 2015, Resulting In A \$117,150 Penalty. [EPA Civil Enforcement Case Report For 06-2015-2702, accessed [05/28/20](#)]

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On September 30th, 2010, Resulting In A \$89,798 Penalty. [EPA Civil Enforcement Case Report For 08-2010-0222, accessed [05/28/20](#)]

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On February 21st, 2015, Resulting In A \$45,521 Penalty. [EPA Civil Enforcement Case Report For 06-2015-2703, accessed [05/28/20](#)]

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On May 6th, 2011, Resulting In A \$35,000 Penalty. [EPA Civil Enforcement Case Report For WY000A0000560370017000006, accessed [05/28/20](#)]

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On February 12th, 2010, Resulting In A \$33,000 Penalty. [EPA Civil Enforcement Case Report For WY000A0000560350009600004, accessed [05/28/20](#)]

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On June 12th, 2012, Resulting In A \$17,850 Penalty. [EPA Civil Enforcement Case Report For CO000A0000080330001300013, accessed [05/28/20](#)]

According To The Environmental Protection Agency, QEP Energy Was Issued One Administrative Penalty Order On December 2nd, 2013, Resulting In A \$7,000 Penalty. [EPA Civil Enforcement Case Report For WY000A0000560350034700005, accessed [05/28/20](#)]

QEP Energy Has Been Fined At Least \$6,000 For Safety Violations By The Occupational Safety And Health Administration.

According To The United States Department Of Labor's Occupational Safety and Health Administration, QEP Energy Had Two Safety Violations On November 1st, 2016, Resulting In A \$6,000 Fine. [Inspection: 1152829.015 – QEP Energy Company, accessed [05/28/20](#)]

QEP Energy Was Sued For "Failing To Provide A Safe Place To Work."

In December 2011, QEP Energy Was Sued After Rig Components Failed And Exploded."

"This civil action is commenced in consequence of the death of Kyle L. Rooke, a husband and father who was killed on January 5, 2011 on a drilling rig in Sublette County, Wyoming. Components of the rig system failed and exploded. The ensuing fire engulfed Mr. Rooke and he was burned to death. [...] The actions of the defendants---in failing to provide a safe place to work---were undertaken in spite of the defendants' knowledge that Wyoming's workplace fatality rate has been a multiple of the national fatality rate and that Wyoming has been ranked as the least safe state for workers amongst all fifty (50) states for most of the past decade. Rather than those facts being a mandate to focus vigilant and transformative safety practices, the defendants recklessly neglected safety and risked further loss of human life." [[2:2011cv00377](#): Rooke v. QEP Energy Company et al, accessed 05/28/20]

FINLEY RESOURCES

Finley Resources, A Company With A History Of Royalty Violations And Giving Contributions Directly To State Oil Regulators, Got A Bailout For Its Public Lands Oil And Gas Leases

Finley Resources And Its Subsidiaries Were Given Lease Suspensions And Royalty Reductions On Public Land In Two States

Finley Resources And Its Subsidiary Lonesome Oil & Gas Have Received Royalty Rate Reductions And Suspended Leases In Utah And Wyoming

BLM Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. “In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers.” [E&E, [05/20/20](#)]

Finley Resources Has Received 13 Separate Royalty Relief Or Lease Suspension Approvals Totaling 37,102 Acres In Utah And Wyoming

- **Finley Resources Has Received One Approved Royalty Rate Reduction To 2.5% In Utah.** The lease covers 5,767 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Finley Resources Has Received One Approved Lease Suspension In Wyoming.** The lease covers 20,000 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
- **Lonesome Oil & Gas Has Received Royalty Relief To 2.5% For 11 Separate BLM Oil & Gas Leases In Utah.** Lonesome’s leases affected by royalty relief affect 11,258.74 acres of public land. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]
 - **Lonesome’s New Royalty Rate Is 2.5% For All 11 Leases.** [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Lonesome Oil & Gas Is A Subsidiary Of Finley Resources. “Finley Resources, Finley Production and Lonesome Oil & Gas, LLC. (collectively the "Finley Resources Group") own interests in approximately 3,000 wells in thirteen states. Finley Resources now operates over 1,000 of those wells in Texas, Oklahoma, New Mexico, Alabama, Mississippi, North Dakota, Wyoming and Utah. Finley Resources has approximately 100 employees. The company maintains over 100,000 acres of leasehold and mineral interest.” [Finley Resources, accessed [08/09/20](#)]

Finley Resources Has Paid Tens Of Thousands In Federal Royalty Violations

Finley Resources Was Fined \$81,952 For Failing To Report Production Reports On Its Federal Leases In 2014. Finley Resources, Inc: Company failed to submit production reports for multiple leases and agreements for production months between June 2010 and March 2012." [ONRR Case CP12-173, accessed [06/08/20](#)]

Finley Resources Paid State Regulators In Texas \$55,000 Before They Decided To Allow Finley To Continue Fracking Near A Town

Texas Regulators Decided To Allow Frackers To Continue Injecting Wastewater Near A Fort Worth Suburb After Scientists Said Fracking May Have Caused Earthquakes There. "Two members of the state panel that regulates oil and natural gas drilling received more than \$70,000 in campaign contributions from individuals and political action committees associated with injection well operators near Azle, the Fort Worth suburb rattled by earthquakes that scientists say could be caused by such wells. Aides to Railroad Commissioners Christi Craddick and David Porter, both Republicans who aren't on the ballot this year, said the donations received between 2010 and 2013 did not play a role in the decision to allow operators to continue injecting wastewater into wells near Azle." [Houston Chronicle, [07/05/14](#)]

Finley Resources's Owner And CEO Paid Regulators \$55,000 Before The Beneficial Decisions. "Jim Finley, chief executive and owner of Finley Resources, an oil and gas company with injection wells near Azle, gave \$40,000 to Porter and \$15,000 to Craddick. Finley could not be reached for comment. The commissioners also received contributions greater than \$1,000 from EnerVest, Ltd., Devon Energy PAC and XTO Energy Inc. PAC, according to Texas Ethics Commission reports." [Houston Chronicle, [07/05/14](#)]

CITATION OIL & GAS

Citation Oil & Gas Got A Bailout Even Though It Has A History Of Dodging Royalties And Dumping Crude Oil Into Rivers

Citation Oil Received A Bailout On Its Public Lands Oil And Gas Leases After It Had To Pay \$2.25 Million In Penalties For Underpaying Royalties

Citation Oil Received A Bailout On A Public Lands Oil And Gas Lease In Wyoming

BLM Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. “In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers.” [E&E, [05/20/20](#)]

Citation 2002 Investment Received A Lease Suspension On A 200-Acre Public Lands Oil And Gas Lease In Wyoming. The lease covers 200 acres of public land. [WYW 055076, accessed [06/09/20](#)]

- **Citation 2002 Investment Is Located At 14077 Cutten Road In Houston, Texas.** [WYW 055076, accessed [06/09/20](#)]
- **14077 Cutten Road Is The Address Of The Citation Oil And Gas.** [Citation Oil & Gas, accessed [06/09/20](#)]

Citation Oil & Gas Is One Of The Largest Privately-Held Oil Companies In The United States. “Citation Oil & Gas Corp. is one of the largest privately-held independent oil & gas acquisition, development and production companies in the United States. Founded in 1981 by Forrest E. Harrell, Sr., Citation has built a significant portfolio of mature, long-life producing properties through a combination of disciplined acquisitions, focused operations and subsequent development. Since 1985, Citation has invested \$2.1 billion in over 80 oil and gas reserve acquisitions. As a result of these acquisitions and subsequent property development, Citation now has ownership interests in approximately 15,600 wells in over 400 separately designated fields that contain over 216 million net equivalent barrels of proved reserves, and has net production of approximately 27,150 barrels of oil and 32 million cubic feet of gas per day. Citation’s reserves are 88% oil and 76% are proved developed and have a reserve life index of 18 years.” [Citation Oil & Gas, accessed [06/09/20](#)]

Citation Oil And Gas Was Forced To Pay \$2.25 Million In Penalties In 2017 After Underpaying Its Royalties On Federal Leases In Wyoming

Citation Was Assessed \$2.25 Million In Penalties Under The False Claims Act For Underpaying Royalties Owed On Its Federal Leases In Wyoming. "Citation Oil & Gas Corp. and its affiliates, Citation 2002 Investment Limited Partnership and Citation 2004 Investment Limited Partnership (collectively, "Citation"), have agreed to pay \$2.25 million to resolve allegations under the False Claims Act that they underpaid royalties owed on natural gas produced from federal lands in Wyoming, the Justice Department announced today. Citation Oil & Gas Corp. is an oil and gas acquisition, development, and exploration company headquartered in Houston, Texas." [Department Of Justice, [12/19/17](#)]

DOJ Officials Said Citation Sought "To Take Improper Advantage Of The Federal Royalty Program At The Expense Of American Taxpayers." "The United States allows companies to remove gas from public lands, which belong to all of us, in exchange for the full payment of royalties owed," said Acting Assistant Attorney General Chad Readler of the Justice Department's Civil Division. "This settlement demonstrates that the government will hold accountable those who seek to take improper advantage of the federal royalty program at the expense of American taxpayers." [...] "When gas companies reduce the amount of money owed to the government by taking deductions they are not entitled to, American taxpayers don't get their fair share. This settlement is a message to the entire gas industry that the government is working together to hold them accountable," said Acting U.S. Attorney Bob Troyer for the District of Colorado." [Department Of Justice, [12/19/17](#)]

Citation Had To Pay Out \$3 Million In A Class Action Lawsuit After Ripping Private Parties Off On Royalties For Twenty Years

Citation Was The Subject Of A Class Action Lawsuit For Dodging Royalties To Oklahomans Between 1997 And 2017. "JND Class Action Administration has issued the following news release: All non-excluded owners of a Royalty Interest in Oklahoma wells with respect to whom Citation paid or incurred an obligation to pay proceeds derived from the sale of oil, gas and/or other minerals occurring from the production month of January 1997 through and including the production month of March 2017; provided that excluded from the Settlement Class are those persons and entities listed on Appendix 1 to the Settlement Agreement. The Litigation seeks damages for Defendant's alleged failure to pay statutory interest on allegedly late payments under Oklahoma law. Defendant expressly denies all allegations of wrongdoing or liability with respect to the claims and allegations in the Litigation." [JND Class Action Administration, [10/12/18](#)]

- **Citation Agreed To Pay A Settlement Fund Of \$3,000,000 To Its Private Royalty Owners.** "On September 21, 2018, the Court preliminarily approved a Settlement in which Defendant has agreed to pay Three Million Dollars (\$3,000,000.00) in cash (the 'Gross Settlement Fund'). From the Gross Settlement Fund, the Court may deduct Class Counsel's Fees and Expenses, a case contribution award, and any settlement Administration, Notice, and Distribution Costs. The remainder of the fund (the 'Net Settlement Fund') will be distributed to Final Class Members or credited to their suspense accounts as provided in the Settlement Agreement. Complete information on the benefits of the Settlement, including information on the distribution of the Net Settlement Fund, can be found in the Settlement Agreement posted on the website listed below. In exchange, Class Members will release Defendant and others identified in the

Settlement Agreement from the claims described in the Settlement Agreement.” [JND Class Action Administration, [10/12/18](#); Settlement Agreement, [08/08/18](#)]

Citation “Willfully” Lied To Government Auditors About Royalties Due In 2008 And 2014

Citation Had To Pay \$3,00,000 To Interior After It Was Caught Providing Altered Contracts To Government Auditors In 2008. “Citation Oil & Gas Corporation: Company knowingly or willfully provided altered contracts to government auditors which concealed important information and delayed audit completion.” [ONRR Case CP03-049, accessed [06/09/20](#)]

Citation Had To Pay \$10,752 After Failing To Report Production On A Federal Well In 2014. “Citation Oil And Gas: Company failed to report production on one well for five production months.” [ONRR Case CP12-038, accessed [06/09/20](#)]

Citation Oil Has A Lengthy Environmental Rap Sheet And Over A Million Dollars In Penalties In The Last 11 Years

Citation Was Assessed A Penalty Of \$115,000 In March 2020 After Dumping Hundreds Of Barrels Of Crude Oil Into A Tributary Of The Big Horn River

Citation Was Assessed Civil Penalty Of \$115,000 In March 2020 For Clean Water Act Violations In Park County, Wyoming. “The U.S. Environmental Protection Agency (EPA) today announced a proposed settlement with Citation Oil & Gas Corp. (Citation) of Houston, Texas, to resolve alleged violations of federal regulations intended to prevent oil pollution. The Clean Water Act violations pertain to oil spill prevention requirements and Spill Prevention, Control, and Countermeasure (SPCC) regulations at Citation’s Park County, Wyoming, oil production facilities. Citation will pay a civil penalty of \$115,000 to resolve the alleged violations.” [EPA Press Release, [03/28/20](#)]

- **Citation Dumped 300 Barrels Of Crude Oil And 1,000 Barrels Of Produced Water Into A Tributary Of The Big Horn River.** “This proposed settlement resulted from EPA’s investigation of two spills at Citation facilities. The first spill occurred on February 9, 2016, when Citation released approximately 300 barrels of crude oil from its Embar 3 Facility into Buffalo Creek, a tributary of the Big Horn River. The second spill occurred on August 21, 2019, when Citation released approximately 1000 barrels of produced water from its North Waterflood Station into the same tributary.” [EPA Press Release, [03/28/20](#)]

Citation Paid \$1,293,145 In Penalties For Environmental Violations Between 2009 And 2018

Citation Paid \$22,125 In Violations For Clean Air Act Violations At Its East Fitts Unit In Oklahoma In 2018. [EPA Civil Enforcement Case Report, [07/24/18](#)]

Citation Paid \$70,000 In Penalties In 2016 For Clean Air Act Violations Involving Sulfur Dioxide At Its Healdton Gas Plant In Oklahoma. [EPA Civil Enforcement Case Report, [10/18/16](#)]

Citation Had To Pay \$10,000 In Penalties Under The Clean Water Act For Unauthorized Discharges At Its Healdton Gas Plant In Oklahoma. "In 2015, EPA Region 6 issued an Administrative Complaint (APO) under its authority pursuant to Section 309 of the Clean Water Act (CWA) to Citation Oil & Gas Corp (Respondent), located in Carter County, Oklahoma. The APO was issued in response to violation of Section 301 of the CWA for discharging fluids high in Total Dissolved Salts to waters of the U.S. The APO proposes that Respondent pay a penalty. Respondent must respond to EPA Region 6 within thirty days of receipt of the Complaint." [EPA Civil Enforcement Case Report, [04/09/15](#)]

Citation Had To Pay \$26,000 In Clean Water Act Penalties For A Discharge Of Produced Wastewater At Its Healdton Field IV Facility In Oklahoma In 2014. "The Respondent is Citation Oil & Gas Corp. Violations were identified as the result of an inspection and a 308 Information Request response. The inspection was conducted but the Environmental Protection Agency (EPA) on June 30, 2013 at the facility located in Carter County, Oklahoma. The response to the 308 Information Request was received by the EPA on October 17, 2013, and was in reference to National Response Center incident report number 1050496. The violations alleged are for the unauthorized discharge of oil field brine and produced wastewater, to waters of the United States." [EPA Civil Enforcement Case Report, [07/08/14](#)]

Citation Had To Pay \$18,000 In Clean Water Act Violations For Discharging Produced Wastewater At Three Oklahoma Locations In 2013. "On February 11, 2013, EPA Region 6 issued an Administrative Complaint (Complaint) under its authority pursuant to Section 309 of the Clean Water Act (CWA) to Citation Oil & Gas Corp., located in Healdton, Oklahoma. The Complaint was issued in response to violation of Section 301 of the CWA for an unauthorized discharge of oil field brine and produced wastewater to a water of the U.S. The Complaint proposes that Citation Oil & Gas Corp. pay a penalty. Citation Oil & Gas Corp. must respond to EPA Region 6 within 30 days of receiving the Complaint." [EPA Civil Enforcement Case Report, [02/25/13](#)]

Citation Had To Pay \$8,000 In Clean Water Act Violations In 2011 After Dumping 20 Barrels Of Crude Oil Into A Tributary Of The Yellowstone River In Montana. "This complaint and settlement agreement is issued to citation oil and gas corporation for placing booms in the spill area and remediated spill-stained shorelines on June 11th and 12th 2009. Respondent discharged approximately 20 barrels of crude oil into its secondary containment which overflowed and allowed oil to travel approximately 2,200 feet and enter cabin creek a tributary to the Yellowstone River." [EPA Civil Enforcement Case Report, [09/19/11](#)]

Citation Paid A Total \$860,000 In Penalties Related To Clean Water Act Violations In Wyoming In 2009. "Citation Oil and Gas Corp. will invest approximately \$580,000 on new and upgraded spill prevention controls at its Cellers Ranch production field in Johnson County, Wyo., and pay a \$280,000 penalty to resolve the government's claims for violations of the Clean Water Act. The U.S. Environmental Protection Agency and U.S. Department of Justice

announced the agreement on January 7 under a consent decree lodged in the United States District Court for the District of Wyoming.” [EPA Press Release, [01/08/09](#)]

- **Citation Dumped More Than 25,000 Gallons Of Crude, Which Made Its Way Into The North Fork Powder River In Wyoming.** “The agreement resolves a discharge of more than 25,000 gallons (597 barrels) of crude oil and produced water at Citation's Cellers Ranch Unit and inadequacies in the company's Spill Prevention Control and Countermeasure (SPCC) plan, an oil pollution prevention requirement under the Clean Water Act. On June 19, 2004, a flow line ruptured at Cellers Ranch, resulting in a spill that contaminated six miles of the North Fork Powder River and adversely impacted waterfowl and other wildlife. The spill was caused by corroded bolts on a buried coupling.” [EPA Press Release, [01/08/09](#)]
- **The Spill Partially Coated The River’s Bank And Harmed Wildlife And Soil.** “The spill at the Cellers Ranch field discharged 25,074 gallons of oil into nearby soils and waters, impacting wildlife, habitat and vegetation. The spill partially coated the banks of the North Fork Powder River and soaked at least eighteen Canada Geese, one Mallard duck and several beaver.” [EPA Press Release, [01/08/09](#)]

KIRKWOOD OIL & GAS

Kirkwood Oil & Gas, Which Drills For Oil In Bears Ears National Monument, Is The Biggest Beneficiary Of BLM's Royalty Relief Bailout

Kirkwood Oil And Nerd Gas Are The Largest Recipients Of Royalty Relief Bailouts From Donald Trump's Bureau Of Land Management

Kirkwood Oil & Gas Is One Of The Biggest Beneficiaries Of Interior's Royalty Relief Bailout To Public Lands Oil And Gas Drillers

BLM Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. "In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers." [E&E, [05/20/20](#)]

Kirkwood Oil & Gas Has Received Royalty Relief For 54 Separate BLM Oil & Gas Leases In Utah. Kirkwood is a co-lessee with Nerd Gas on 54 separate oil and gas leases covering 71,328 acres of public land in Utah. Its royalty rate has been reduced from 12.5% to 0.5%. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

- **Of All The Companies Receiving Relief, None Has Received More Than Kirkwood and Nerd.** [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Additionally, Kirkwood Oil Has Received Lease Suspensions For Two BLM Leases In Wyoming Totaling 1,963 Acres. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Kirkwood Oil & Gas Drills For Oil In What Used To Be Bears Ears National Monument...

Bears Ears National Monument Included BLM Leases Held By Kirkwood Oil & Gas. "Under President Barack Obama's Bears Ears proclamation on Dec. 28, the monument's 1.3 million acres were withdrawn from future mineral leasing. But existing mineral rights are honored, such as those held by Kirkwood Oil and Gas, one of the firms that also had asked to lease additional lands inside what are now the boundaries." [Salt Lake Tribune, [06/19/17](#)]

Even Though The Monument Designation Protected Kirkwood's Mineral Rights, The Company Wanted To Drill More In Bears Ears, And Opposed The Monument. "But industry is curious about lands in the north end of the new monument, in the Canyon Rim area just

across the Colorado River from Canyonlands National Park. Here the Bears Ears designation overlaps two exploratory oil and gas fields — known as Hatch Point and Three Mile — that had long been approved by BLM, according to Steven Degenfelder spokesman for Kirkwood. The company can drill on the leases it had before the designation, but without the ability to expand operations onto new leases nearby, the project might not be economically feasible. For that reason, ‘we were concerned with the monument initially that it negatively impacts some of our existing lease rights,’ he said.” [Salt Lake Tribune, [06/19/17](#)]

Kirkwood Also Drills Just Outside The North Entrance To Canyonlands National Park. “The Casper, Wyo.-based producer has acquired a highly productive oil field at nearby Big Flat, outside Canyonlands' north entrance, and an interest in three San Juan County fields. Kirkwood has three nonproducing wells at Hatch Point, but hopes to keep looking and plans a seismic study.” [Salt Lake Tribune, [06/19/17](#)]

...And Got Royalty Relief For A Lease That Was Cut From The Monument's Boundary

Kirkwood Oil Received A Reduced Royalty Rate On Lease UTU 079184. The case recordation shows that lease UTU 079184, for which Kirkwood Oil & Gas and Nerd Gas Co are each lessees with a 50% interest, was approved for a reduced royalty rate of 5% on April 30, 2020. [BLM Case Recordation UTU 079184, accessed [06/08/20](#)]

UTU 079184 Was Cut From Bears Ears National Monument When Donald Trump Ordered A Reduction Of The Monument. UTU 079184 is a BLM oil & gas lease on 1,638 acres of public land. [Western Values Project, [12/18/18](#)]

- **Kirkwood Is A Lessee For 10 Other Leases Cut From The Bears Ears National Monument Boundary.** [Western Values Project, [12/18/18](#)]

Steven Kirkwood Of Kirkwood Oil Was A Donor To Donald Trump's 2016 Campaign

Steven Kirkwood Of Kirkwood Oil & Gas Gave \$800 To Donald Trump's 2016 Presidential Campaign.

- Steven C. Kirkwood Of Kirkwood Oil & Gas Gave \$400 To Donald J. Trump For President, Inc. On July 19, 2016. [FEC, [07/19/16](#)]
- Steven C. Kirkwood Of Kirkwood Oil & Gas Gave \$400 To Donald J. Trump For President, Inc. On August 24, 2016. [FEC, [08/24/16](#)]

CHESAPEAKE ENERGY

The Trump Administration Gave Almost-Bankrupt Chesapeake Energy Royalty Relief On 109 Leases Despite Chesapeake's Long History Of Price-Fixing, Underpaying Royalties, And Environmental Violations

Chesapeake Energy Got Royalty Relief From The Bureau Of Land Management On Over 72,000 Acres Of Land Despite Various Lawsuits Against The Company For Underpaying Royalties

The Trump Administration Has Given Chesapeake Energy Royalty Relief On 109 Leases Totaling 72,319 Acres...

Chesapeake Energy Is An Oil And Gas Company. “We are an independent exploration and production company engaged in the acquisition, exploration and development of properties to produce oil, natural gas and NGL from underground reservoirs.” [SEC EDGAR – Chesapeake Energy 10-K, [02/27/20](#)]

On May 1, 2020, Chesapeake Energy Received Lease Suspensions On 40 Leases Totaling 28,016 Acres Of Land. [[COVID-19 Royalty Reduction And Lease Suspensions](#), accessed 05/28/20]

On May 14, 2020, Chesapeake Energy Received Lease Suspensions On 68 Leases Totaling 44,062 Acres Of Land. [[COVID-19 Royalty Reduction And Lease Suspensions](#), accessed 05/28/20]

On May 18, 2020, Chesapeake Energy Received A Lease Suspension On 1 Lease Totaling 240 Acres Of Land. [[COVID-19 Royalty Reduction And Lease Suspensions](#), accessed 05/28/20]

...Even Though Chesapeake Energy Had Already Been Underpaying Royalties

Chesapeake Energy Is Involved In Various Lawsuits Claiming They Underpaid Royalties, Made Improper Deductions, And Use Below-Market Prices. “We and other natural gas producers have been named in various lawsuits alleging underpayment of royalties and other shares of the proceeds of production. The lawsuits against us allege, among other things, that we used below-market prices, made improper deductions, utilized improper measurement techniques, entered into arrangements with affiliates that resulted in underpayment of amounts owed in connection with the production and sale of natural gas and NGL, or similar theories.” [SEC EDGAR – Chesapeake Energy 10-K, [02/27/20](#)]

On September 30, 2014, Chesapeake Energy Was Fined \$765,000 For A “Federal Leasing Royalty Violation.” [Violation Tracker Individual Record - [Chesapeake Energy Corporation](#), accessed 05/28/20]

On September 30, 2014, Chesapeake Energy Was Fined \$428,400 For A “Federal Leasing Royalty Violation.” [Violation Tracker Individual Record - [Chesapeake Energy](#), accessed 05/28/20]

On September 30, 2016, Chesapeake Energy Was Fined \$2,118,900 For A “Federal Leasing Royalty Violation.” [Violation Tracker Individual Record - [Chesapeake Energy](#), accessed 05/28/20]

Before Coronavirus Hit, Chesapeake Energy Was Already On The Verge Of Bankruptcy After Losing \$8.3B In The First Quarter Of 2020 On Top Of Billions In Debt And Millions In Losses

In December 2019, Chesapeake Energy Was Notified It Was At Risk Of Being Delisted From The New York Stock Exchange After \$308M In Net Losses...

Chesapeake Energy Had A Net Loss Of \$308 Million In 2019. [SEC EDGAR – Chesapeake Energy 10-K, [02/27/20](#)]

On December 10, 2019, Chesapeake Energy Was Informed They Were At Risk Of Being Delisted From The New York Stock Exchange Due To Consistently Low Share Prices. “On December 10, 2019, we were notified by the New York Stock Exchange (the “NYSE”) that the average closing price of our common stock, \$0.01 par value per share (the “Common Stock”), over a prior 30 consecutive trading day period was below \$1.00 per share, which is the minimum average closing price per share required to maintain listing on the NYSE under Section 802.01C of the NYSE Listed Company Manual. We have a period of six months following the receipt of the notice to regain compliance with the minimum share price requirement, with the possibility of extension at the discretion of the NYSE. [...] If the Common Stock ultimately were to be delisted for any reason, it could negatively impact us as it would likely reduce the liquidity and market price of the Common Stock; reduce the number of investors willing to hold or acquire the Common Stock; and negatively impact our ability to access equity markets and obtain financing.” [SEC EDGAR – Chesapeake Energy 10-K, [02/27/20](#)]

...And Already Had Over \$8.9B In Debt.

Chesapeake Energy Has \$8.916 Billion Of Debt As Of December 31, 2019. “We have a significant amount of indebtedness. Our leverage and debt service obligations may adversely affect our financial condition, results of operations and business prospects, and we may have difficulty paying our debts as they become due. As of December 31, 2019, we had approximately \$8.916 billion in principal amount of debt outstanding (including \$301 million of current maturities and \$1.590 billion drawn under our senior secured revolving credit facility).” [SEC EDGAR – Chesapeake Energy 10-K, [02/27/20](#)]

Chesapeake Energy Filed For Bankruptcy On June 28, 2020.

Chesapeake Energy, An Oil And Gas Producer, Filed For Bankruptcy On June 28, 2020.

“Chesapeake Energy Corp (CHK.N) filed for Chapter 11 on Sunday, becoming the largest U.S. oil and gas producer to seek bankruptcy protection in recent years as it bowed to heavy debts and the impact of the coronavirus outbreak on energy markets.” [*Reuters*, [06/28/20](#)]

Despite Its Terrible Finances, Chesapeake Energy Execs Still Made Millions Plus “Incentive Compensation” While The Company Laid Off Workers

Chesapeake Energy Executives Made Over \$32.8M In 2019...

Chesapeake Energy President And CEO Robert D. Lawler Made \$15,392,109 In Total Compensation In 2019. [SEC EDGAR – Chesapeake Energy 10-K/ A, [04/29/20](#)]

Chesapeake Energy Executive Vice President And CFO Domenic Dell’Osso Made \$5,456,121 In Total Compensation In 2019. [SEC EDGAR – Chesapeake Energy 10-K/ A, [04/29/20](#)]

Chesapeake Energy Executive Vice President Of Exploration And Production Frank J. Patterson Made \$5,143,828 In Total Compensation In 2019. [SEC EDGAR – Chesapeake Energy 10-K/ A, [04/29/20](#)]

Chesapeake Energy Executive Vice President, General Counsel, And Corporate Secretary James R. Webb Made \$4,694,719 In Total Compensation In 2019. [SEC EDGAR – Chesapeake Energy 10-K/ A, [04/29/20](#)]

Chesapeake Energy Senior Vice President And Chief Accounting Officer William B. Buergler Made \$2,115,486 In Total Compensation In 2019. [SEC EDGAR – Chesapeake Energy 10-K/ A, [04/29/20](#)]

...And Received \$25M In “Incentive Compensation”...

In May 2020, Chesapeake Energy Has Plans To Prepay Its Top 21 Execs \$25 Million In “Incentive Compensation.” “Chesapeake Energy Corp said it would prepay a total of \$25 million in incentive compensation to 21 top executives to ensure they are motivated, even as it prepares to file for bankruptcy protection to tackle its nearly \$9 billion debt pile.” [*Reuters*, 05/10/20]

...After Chesapeake Energy Laid Off 200 Employees.

Oklahoma Announced Chesapeake Energy Had Laid Off 200 Employees On April 16, 2020.

“Chesapeake Energy Corp, the debt-laden shale producer, has laid off 200 employees in Oklahoma, the state said on Thursday. Half of the job cuts were at the company’s Oklahoma City headquarters and half were in the oilfield, according to the Oklahoma Office of Workforce Development.” [*Reuters*, 04/16/20]

The Trump Administration's Gift Of Royalty Relief To Chesapeake Energy Comes After The Company Spent \$2.3M On Lobbying And Donated Over \$3K To Trump Since 2016

Chesapeake Energy Has Spent Over \$2.3M On Lobbying Since 2016...

Chesapeake Energy Spent \$540,000 On Lobbying In 2016. [Client Profile - [Chesapeake Energy 2016](#), Open Secrets, accessed 05/28/20]

Chesapeake Energy Spent \$620,000 On Lobbying In 2017. [Client Profile - [Chesapeake Energy 2016](#), Open Secrets, accessed 05/28/20]

Chesapeake Energy Spent \$660,000 On Lobbying In 2018. [Client Profile - [Chesapeake Energy 2016](#), Open Secrets, accessed 05/28/20]

Chesapeake Energy Spent \$430,000 On Lobbying In 2019. [Client Profile - [Chesapeake Energy 2016](#), Open Secrets, accessed 05/28/20]

Chesapeake Energy Spent \$70,000 On Lobbying In 2020. [Client Profile - [Chesapeake Energy 2016](#), Open Secrets, accessed 05/28/20]

...Along With Donating \$3,037 To Trump Presidential Campaign.

Chesapeake Energy Donated \$2,942 To Donald Trump's Presidential Campaign In 2016. [Chesapeake Energy Donation Recipients 2016, [OpenSecrets](#), accessed 05/28/20]

Chesapeake Energy Donated \$95 To Donald Trump's Presidential Campaign In 2020. [Chesapeake Energy Donation Recipients 2020, [OpenSecrets](#), accessed 05/28/20]

Chesapeake Energy Has Incurred Nearly \$14M In Environmental Violation Including Fines For Polluting Waterways And Causing Earthquakes

Chesapeake Energy Has Incurred Almost \$14M In Fine For Environmental Violations.

Chesapeake Energy Has Been Fined \$13,889,964 In Environmental Violations From 2002 To 2016. [[Violation Tracker](#), accessed 05/28/20]

Environmental Violations Levied Against Chesapeake Energy Include One Of The Largest Fines From The Federal Government For Polluting Waterways...

Chesapeake Energy Was Fined \$3.2 Million For Violating The Clean Water Act After The "Unauthorized Discharge Of Fill Materials Into Streams And Wetlands." "The Department of Justice and the U.S. Environmental Protection Agency (EPA) announced today that Chesapeake Appalachia LLC, a subsidiary of Chesapeake Energy, the nation's second largest natural gas producer, will spend an EPA-estimated \$6.5 million to restore 27 sites damaged by

unauthorized discharges of fill material into streams and wetlands and to implement a comprehensive plan to comply with federal and state water protection laws at the company's natural gas extraction sites in West Virginia, many of which involve hydraulic fracturing operations. The company will also pay a civil penalty of \$3.2 million, one of the largest ever levied by the federal government for violations of Section 404 of the Clean Water Act (CWA), which prohibits the filling or damming of wetlands, rivers, streams, and other waters of the United States without a federal permit." [[Department Of Justice](#), 12/19/13]

...And A \$1.4M Fine For Chesapeake Energy's Role In A 2011 Landslide.

Chesapeake Energy Paid \$1.4 Million For Their Role In A 2011 Landslide That Affected Several Waterways. "A unit of Chesapeake Energy Corp. will pay a \$1.4 million fine in Pennsylvania for a 2011 landslide from a well pad that affected several tributaries to a stream. Pennsylvania's Department of Environmental Protection announced Monday that Chesapeake Appalachia LLC agreed to the consent order and fine. The company will restore waterways affected by the slide from the Stringer 8H natural gas well pad in Greene County on Sept. 15, 2011." [[The Oklahoman](#), 11/24/15]

Chesapeake Energy Is Also Involved In Various Lawsuits In Oklahoma For Causing Earthquakes.

Chesapeake Energy Is Involved In Numerous Lawsuits For Compensation From Earthquake The Company Has Helped Cause. "We are named as a defendant in numerous lawsuits in Oklahoma alleging that we and other companies have engaged in activities that have caused earthquakes. These lawsuits seek compensation for injury to real and personal property, diminution of property value, economic losses due to business interruption, interference with the use and enjoyment of property, annoyance and inconvenience, personal injury and emotional distress. In addition, they seek the reimbursement of insurance premiums and the award of punitive damages, attorneys' fees, costs, expenses and interest." [SEC EDGAR - Chesapeake Energy 10-K, [02/27/20](#)]

Chesapeake Energy Was Fined \$25M in 2015 For Colluding With Another Energy Company To Keep Oil And Gas Prices Low For Themselves

Chesapeake Energy And Encana Corp Were Charged For Conspiring With Each Other To Keep Oil And Gas Prices Artificially Low In Michigan

Chesapeake Energy Paid \$25 Million For Price-Fixing And Anti-Competitive Practices On April 24, 2015. "Chesapeake Energy Corp. agreed to pay \$25 million to a victims compensation fund in settlement of allegations it conspired with Encana Oil & Gas to avoid bidding wars for Michigan oil and gas leases. It also pleaded guilty to one count of attempted antitrust violations, a misdemeanor, and one count of false pretenses, a misdemeanor. Criminal sentencing was suspended on condition of abiding by settlement terms. Encana settled the allegations against it in 2014" [Violation Tracker - [Chesapeake Energy Corp](#), accessed 05/28/20]

Chesapeake Energy's Fine Came After They And Encana Corp Were Charged With "Colluding To Keep Oil And Gas Lease Prices Artificially Low" In Michigan. "Oil and gas giants Chesapeake Energy and Encana Corp were charged on Wednesday with colluding to keep oil and gas lease prices artificially low in Michigan, state Attorney General Bill Schuette said. [...] The criminal charges follow a lengthy investigation by Schuette's office into whether the firms — the biggest land leasers during a speculative oil and gas leasing boom in Michigan's Collingwood Shale region during 2010 — colluded to keep prices from rising as they acquired land leases from landowners. Michigan began looking into the companies' activities in 2012 after a Reuters investigation found that executives from the two firms discussed proposals to divide bidding responsibilities in the state for nine private landowners and counties in Michigan." [[Reuters](#), 03/05/14]

Chesapeake Energy Has Faced Additional Antitrust Charges Of Bid-Rigging In Oklahoma

In 2016, Chesapeake Energy Was Charged With Conspiring With Other Energy Companies To Control The Cost Of Bids For Leases In Oklahoma

In 2016, Chesapeake Energy's Former CEO Aubrey McClendon Was Charged With Rigging Bids For Oil And Gas Leases In Oklahoma After A 4-Year Antitrust Probe. "Aubrey McClendon, former chief executive officer of Chesapeake Energy Corp (CHK.N) and a legend in the U.S. energy industry, was charged on Tuesday with conspiring to rig bids to buy oil and natural gas leases in Oklahoma, the Justice Department said. [...] The indictment follows a nearly four-year federal antitrust probe that began after a 2012 Reuters investigation found that Chesapeake had discussed with a rival how to suppress land lease prices in Michigan during a shale-drilling boom. Although the Michigan case was subsequently closed, investigators uncovered evidence of alleged bid-rigging in Oklahoma." [[Reuters](#), 03/01/16]

The Indictment Claimed Aubrey McClendon Colluded With 2 Energy Companies To Not Bid Against Each Other From 2007 To 2012. "The seven-page indictment alleges that McClendon set up a conspiracy of two energy companies which agreed not to bid against each other in purchasing oil and natural gas leases in northwest Oklahoma from 2007 to 2012. The indictment did not name either company." [[Reuters](#), 03/01/16]

Chesapeake Energy's Shady Practices Have Additionally Led To A Lawsuit Over The Oil And Gas Company Artificially Depressing Lease Prices In Kansas

In 2016, Chesapeake Energy Was Sued For Conspiring To Lower The Cost For Oil And Gas Leases In Kansas.

Chesapeake Energy Was Sued In 2016 For "Conspiring To Depress The Market" For Oil And Gas Leases In Kansas And Other States. "Investors who sold oil and natural gas land leases to Chesapeake Energy Corp and now-bankrupt SandRidge Energy Corp sued Chesapeake and Tom Ward, SandRidge's former CEO, alleging that they conspired to depress the market for those leases. [...] Chisholm alleged Chesapeake and SandRidge divided the area covering the

Anadarko Basin in Kansas and other states and agreed not to compete, which drove down prices for the leases.” [[Reuters](#), 07/19/16]

- **SandRidge’s Former CEO Who Also Faced Charges In This Case Was A Cofounder Of Chesapeake Energy** “Chisholm said in the complaint that many believe the other unnamed co-conspirators were Chesapeake, SandRidge and Ward. Before Ward founded SandRidge in 2006, he co-founded Chesapeake with McClendon in 1989.” [[Reuters](#), 07/19/16]

Along With Price Fixing And Environmental Fines, Chesapeake Energy Has Been Fined \$312,627 For Safety, Labor, And Consumer Protection Violations

Chesapeake Energy Was Fined \$30,000 For Labor Relations Violations...

On January 12, 2007, Chesapeake Energy Was Fined \$30,000 For A “Labor Relations Violation.” [Violation Tracker Individual Record - [Chesapeake Energy](#), accessed 05/28/20]

...\$250,000 For Consumer Protection Violations...

On June 14, 2012, Chesapeake Energy Subsidiary Chesapeake Appalachia LLC Was Fined \$250,000 For A “Consumer-Protection-Related Violation.” [Violation Tracker Individual Record - [Chesapeake Appalachia LLC](#), accessed 05/28/20]

...And \$32,627 In Workplace Safety Or Health Violations.

On February 24, 2011, Chesapeake Energy Subsidiary Chesapeake Operating Inc Was Fined \$12,000 For A “Workplace Safety Or Health Violation.” [Violation Tracker Individual Record - [Chesapeake Operating Inc](#), accessed 05/28/20]

On November 16, 2011, Chesapeake Energy Subsidiary Chesapeake Operating Inc Was Fined \$7,000 For A “Workplace Safety Or Health Violation.” [Violation Tracker Individual Record - [Chesapeake Operating Inc](#), accessed 05/28/20]

On January 31, 2013, Chesapeake Energy Subsidiary Chesapeake Operating Inc Was Fined \$13,627 For A “Workplace Safety Or Health Violation.” [Violation Tracker Individual Record - [Chesapeake Operating Inc](#), accessed 05/28/20]

SAMSON RESOURCES

One Of The Largest Recipients Of Lease Suspensions Is Samson Resources, An Oil Company An Unstable Past And Close Ties To Donald Trump's Interior Department

Samson Resources Is A Former Lobbying Client Of Interior Secretary David Bernhardt

Interior Secretary David Bernhardt Used To Lobby For The Oil Company Samson Resources

Samson Resources Federal Lobbying Disclosure Forms Listed David Bernhardt As Their Lobbyist. [Samson Resources Lobbying Registration, [03/20/12](#)]

- **Samson Resources Is An Oklahoma Oil Company.** "Samson Resources Corp operates as an oil and gas company. The Company explores, develops, and produces oil and natural gas. Samson Resources serves customers in the State of Oklahoma." [Bloomberg, accessed [06/08/20](#)]
- **Samson Resources Has Substantial Oil and Gas Assets in Wyoming.** "The investments in Wyoming's Powder River basin are paying off for Tulsa's Samson Resources II. The company announced production of two major wells in the Frontier formation of Converse County, Wyoming – both with production of more than 3,400 barrels a day. [...] Joseph A. Mills, President and CEO of the Company stated, 'The Bohlander and Allemand Frontier formation well results further illustrate the target rich nature of Samson's 154,000 net acres in the Powder River Basin.'" [OK Energy Today, [11/12/19](#)]

Samson Resources Is One Of The Biggest Beneficiaries Of Interior's Bailout To Public Lands Oil And Gas Drillers

BLM Has Offered A Pandemic Bailout To Public Lands Oil Producers Through Lease Suspensions And Royalty Relief. "In all, more than 1,000 applications for royalty relief or lease suspensions have flooded Western BLM state offices following Interior guidance last month that promised rapid processing during the COVID-19 pandemic, according to the documents. Interior officials have not released full information about those requests amid scrutiny of what critics have deemed a bailout to industry, prompting frustrated House Democrats to push for hard numbers." [E&E, [05/20/20](#)]

Samson Resources Has Received 54 Separate BLM Lease Suspensions Covering 23,673. Acres Of Public Land In Wyoming. [BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]


- **Of All The Companies Receiving Lease Suspensions, Only One Has Received More Than Samson Resources.** Only Chesapeake Exploration has received more lease suspensions than Samson Resources.[BLM LR2000 Lease Suspension And Royalty Relief Database, [06/01/20](#)]

Samson Also Has Ties To William Perry Pendley, The Acting Director Of The Agency Granting Lease Suspensions

William Perry Pendley, The Acting Director Of The BLM, Is Recused From Participating In Matters Related To The Petroleum Association Of Wyoming Until July 15, 2021 Under EO 13770, Paragraph 6. [William Perry Pendley Recusal List, accessed [06/02/20](#)]

- **William Perry Pendley Is Also Recused from Participating Personally and Substantially In Particular Matters Involving Specific Parties That Are Directly and Substantially Related to the Petroleum Association of Wyoming Under 5 C.F.R 18 § 2635.502 and 5 C.F.R 18 § 2635.101(b)(14).** [William Perry Pendley Recusal List, accessed [06/02/20](#)]

Samson Resources Is A Platinum Sponsor Of The Petroleum Association Of Wyoming.

2020 PLATINUM SPONSORS	CONTACT
	Petroleum Association of Wyoming 951 Werner Court, Suite 100 Casper, WY 82601-1351 PHONE: 307.234.5333

[Petroleum Association Of Wyoming, [accessed 06/02/20](#)]

Samson Resources, Which Has A History Of Environmental Violations, Was In Financial Trouble Long Before The COVID-19 Pandemic

Samson Re:sources's Financial Problems Aren't Due To The Pandemic-- The Company Declared Bankruptcy In 2015

Samson Resources Filed For Bankruptcy In 2015 After Accumulating \$3.25 Billion In Debt.

“KKR & Co.’s Samson Resources Corp. filed for chapter 11 bankruptcy protection on Wednesday with a plan to wipe out more than \$3.25 billion in debt from its books as low oil and gas prices continue to hammer producers. The Tulsa, Okla.-based oil and gas company’s move to shore up its finances comes as energy companies across the U.S. deal with the fallout of crude-oil prices fetching less than half what they did a year ago and natural-gas prices in a prolonged slump.” [Wall Street Journal, [09/17/15](#)]

- **Samson Cited Low Oil Prices As A Reason For Its Bankruptcy When Oil Was Still Above \$40 Per Barrel.** “Samson enters bankruptcy as fears of a prolonged price slump spread through the oil and gas industry, after what had been seen as a worst-case scenario begins to play out. At the start of this year, as investors worried that oil prices could fall below \$40 a barrel, Standard & Poor’s analyst Thomas Watters predicted that low prices persisting into the second half of 2015 would hurt companies more than a short but severe dip.” [*Wall Street Journal*, [09/17/15](#)]

Samson Resources Emerged From Bankruptcy In 2017 After Discharging \$4 Billion In Debt And Nearly \$300 Million In Annual Interest. “Samson Resources Corporation (‘SRC’) announced today that the Company and its subsidiaries have emerged from Chapter 11 bankruptcy protection, after satisfying all of the conditions required under its Plan of Reorganization (the ‘Plan’), which was confirmed by the U.S. Bankruptcy Court for the District of Delaware on February 13, 2017. Under the Plan, substantially all of SRC’s remaining assets, including its subsidiaries, were transferred to Samson Resources II, LLC (‘Samson II’ or the ‘Company’). The majority of the equity in Samson II was distributed to SRC’s second lien lenders, both on account of their claims in the bankruptcy and in connection with a \$60 million rights offering. In addition, Joseph A. Mills has been officially appointed by the new Board of Directors as Samson II’s President and Chief Executive Officer, succeeding Andrew Kidd, who accepted the position in February 2016, having previously served as General Counsel. Samson II features a substantially improved financial position, having discharged approximately \$4 billion of debt and nearly \$300 million of annual interest expense under the Plan. Samson II’s post-emergence debt financing consists of a first lien revolving credit facility with an initial borrowing base of \$280 million, of which \$245 million was outstanding on the effective date.” [Samson Resources Press Release, [03/01/17](#)]

Samson Resources Has A Lengthy Environmental And Safety Rap Sheet

Samson Resources Agreed To Pay Penalties Of \$75,000 For Environmental Violations To The EPA In 2013. EPA says that Samson Resources failed to obtain a permit before building a facility in Colorado and “numerous other violations” in 2013. “RESPONDENT FAILED TO OBTAIN A PSD PERMIT FOR THE FACILITY BEFORE BEGINNING CONSTRUCTION; FAILED TO SUBMIT NOTICE OF SUBPART ZZZZ; FAILURE TO SUBMIT A NOTICE OF COMPLIANCE; AND NUMEROUS OTHER VIOLATIONS.” [EPA Civil Enforcement Case 08-2013-0137, accessed [06/08/20](#)]

Samson Resources Had To Pay Civil Penalties Of \$12,100 After It Was Caught Spilling Produced Water In Colorado. [EPA Civil Enforcement Case 08-2015-0108, accessed [06/08/20](#)]

- **Samson’s Spill Resulted In Discharges Of Pollutants Into The Beaver Creek On The Southern Ute Reservation.** “On October 20, 2014, the U.S. Environmental Protection Agency (EPA) received a report from the National Response Center of a produced water spill on the Southern Ute Reservation from a pipeline owned and operated by Samson Resources. Samson Resources reported a discharge of approximately 100 barrels of produced water as a result of a corroded pipeline. Approximately 15 barrels of the spilled produced water went into Beaver Creek in the Southern Ute Reservation. Copies of photos provided to the EPA by the Southern Ute Indian Tribe Environmental

Programs Division, suggest discharges of pollutants into the Beaver Creek may have occurred in connection with the spill resulting from the corrosion of a pipeline." [EPA Civil Enforcement Case 08-2015-0108, accessed [06/08/20](#)]

Samson Resources Had To Pay \$19,800 In Penalties After OSHA Found Four "Serious" Safety Violations At Its Oil & Gas Wells In Wyoming. [OSHA, accessed [06/08/20](#)]

Samson Resources Had To Pay \$7,000 In Penalties After OSHA Found A "Serious" Safety Violations At One Of Its Worksites In Colorado. [OSHA, accessed [06/08/20](#)]

US REALM POWDER RIVER

BLM Gave A Bailout To A Bankrupt Company That Owes Millions In Taxes To Two Different Wyoming Counties

US Realm Powder River Had Its Royalty Rate Drop To Nearly Zero On 8,[[[Acres Of Public Land Leases, Despite Tax Delinquency And Bankruptcy

US Realm Powder River Got Its Royalty Rate Slashed To 0.5% On Sixteen Leases Covering 7,976 Acres Of Public Land In Wyoming Even Though It Still Owed Royalties On Those Leases From 2019

US Realm Powder River Is The Sole Or Majority Lessee On 16 Bureau Of Land Management Leases That Were Given A Reduced Royalty Rate To 0.5%.

- US Realm Got A Reduced Royalty Rate On Lease Number WYW 021220. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 0266650. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 021221. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 033801. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 040634. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 072471. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 085359. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 085360. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 085361. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 0266641. [BLM, accessed [08/27/20](#)]
- US Realm Got A Reduced Royalty Rate On Lease Number WYW 0266642. [BLM, accessed [08/27/20](#)]

- **US Realm Got A Reduced Royalty Rate On Lease Number WYW 0266643.** [BLM, accessed [08/27/20](#)]
- **US Realm Got A Reduced Royalty Rate On Lease Number WYW 0266651.** [BLM, accessed [08/27/20](#)]
- **US Realm Got A Reduced Royalty Rate On Lease Number WYW 041473.** [BLM, accessed [08/27/20](#)]
- **US Realm Got A Reduced Royalty Rate On Lease Number WYW 0266653.** [BLM, accessed [08/27/20](#)]
- **US Realm Got A Reduced Royalty Rate On Lease Number WYW 039581.** [BLM, accessed 08/27/20]

US Realm Owed Royalties From 2019 On The Same Leases. “US Realm holds a 50% or greater share in 21 of its 23 leases that received the maximum royalty reduction for May and June, according to the BLM’s LR2000 database. At the time the applications were approved, the company owed more than \$40,000 in 2019 royalties on the specific leases that received relief, according to a court claim from the U.S. Department of Interior. Chris Mentasti, a spokesman for Interior’s Office of Natural Resources Revenue, confirmed in a Sept. 21 email to the Bulletin that those royalties remained unpaid.” [*Buffalo Bulletin*, [09/30/20](#)]

On US Realm Powder River, LLC, Went Bankrupt, Dodging Millions In Taxes Owed To Two Wyoming Counties

US Realm Powder River Went Bankrupt In October 2019. It Owed \$11.15 Million In Unpaid Ad Valorem Mineral Taxes To Johnson County, Wyoming. “It was the worst possible answer to Johnson County’s \$11 million question. New bankruptcy filings revealed that Moriah Powder River LLC, which initiated its Chapter 11 case on Oct. 31, owes the county \$11.15 million in unpaid ad valorem mineral taxes – a debt listed in county records as belonging to Moriah’s operator, Carbon Creek Energy. A bankrupt debtor means it is less likely than ever that the county will collect all of the money it is owed.” [*Gillette News Record*, [12/05/19](#)]

- **By February 2020, US Realm Powder River Owed Johnson County More Than \$15 Million In Unpaid Mineral Production Taxes.** “Although Wages said that there had been no discussion of a pending bankruptcy, Carbon Creek and Powder River Midstream’s sister company U.S. Realm Powder River, formerly known as Moriah Powder River, filed for bankruptcy in October, owing the county more than \$15 million in unpaid mineral production taxes. Those taxes and any associated liens will be unaffected by this week’s agreement.” [*Casper Star Tribune*, [02/20/20](#)]

US Realm Powder River Also Dodged Millions In Taxes Owed To Campbell County, Wyoming, Despite Having \$130 Million In Profits There. “Carbon Creek Energy and Powder River Midstream were subsidiaries of Moriah Powder River LLC, which filed for bankruptcy

last fall. Carbon Creek Energy and Powder River Midstream now operate under U.S. Realm Powder River. The companies paid the county about \$1.4 million in taxes for 2016, but did not pay anything from 2017-19 under the Moriah umbrella. The \$1.4 million accrued interest in an escrow account since 2016 to bring the figure up to \$1.85 million. The company owed \$3.5 million in taxes overall since 2016, but its deal with the county is only for the \$1.85 million. As a result, the county will not get \$1.65 million in taxes it was owed. The company has made about \$130 million doing business in Campbell County.” [Casper Star Tribune, [07/05/20](#)]

- **US Realm Powder River’s Subsidiaries Agreed To A \$1.8 Million Property Tax Settlement With Campbell County, Despite Owing Approximately \$8.5 In Unpaid Taxes.** “The two energy companies owed approximately \$8.5 million in unpaid property taxes dating back to 2016. The dispute has drug on for the past four years with the approved settlement agreement finally bringing the matter to the close with the commissioners agreeing to accept only \$1.8 million of the total due. A similar situation occurred in February, when Johnson County settled with the same energy companies over unpaid taxes. The proposed settlement does not apply to any unpaid production taxes. It solely pertains to the real and personal property taxes that the entities owe Campbell County, which in this case were assessed on CCE and PRM land and equipment, including compressor stations, pipelines, and other infrastructure related to methane gas production and transportation.” [County 17, [06/30/20](#)]

County Commissioners Said The Company’s Behavior Was “Disturbing” And “Intentional.” “Though the commissioners approved the settlement agreement, none were seemingly happy with the outcome. ‘It is quite disturbing to me that we’ve got a company that is out there making \$138 million in Campbell County that paid one year’s worth of taxes, then come back and appeal and owe twice as many taxes, but yet, we don’t have a mechanism to recover those taxes when they’re making a lot of money off of Campbell County,’ Chairman DG Reardon said. Several other commissioners voiced their disdain. ‘I would say in my opinion that this was intentional, but that’s the system they play. Unfortunately, this is a statute change that has to happen at some point,’ Rusty Bell said.” [County 17, [06/30/20](#)]