AMERICAN EXPLORATION & PRODUCTION COUNCIL

AXPC'S 2026 POLICY ROADMAP

SECURING ENERGY AFFORDABILITY THROUGH AMERICAN ENERGY COMPETITIVENESS

INTRODUCTION

Affordable and reliable energy is foundational to America's economic strength, household budgets, industrial competitiveness, and national security. The American Exploration & Production Council (AXPC) represents leading independent producers that deliver the majority of U.S. oil and natural gas production—supplying the fuels and feedstocks that power transportation, manufacturing, agriculture, and electricity generation across the nation.

The 2026 Policy Roadmap builds on the foundation established in 2025 — consequential administrative and legislative actions that put us on a path to secure American energy dominance. Over the past year, progress has been made in reinforcing the importance of U.S. energy production to economic stability, energy security, and reliability. Despite that progress, Americans continue to face cost-of-living pressures in which energy prices remain a core driver. At the same time, independent producers are operating in a more volatile and price-sensitive environment where inefficiency, delay, and policy uncertainty materially affect investment decisions and long-term supply.

Energy affordability is inseparable from energy supply. Policies that delay development, constrain infrastructure, or raise costs without improving outcomes reduce investment and tighten markets—placing upward pressure on prices for consumers and businesses. These effects are magnified in lower-price environments, where regulatory inefficiency, prolonged timelines, and uncertainty directly influence whether development proceeds.

Federal policy can materially lower the cost of producing energy by reducing idle capital, shortening timelines, and restoring project certainty and predictability to the regulatory process. Those cost reductions help facilitate new investment and production, supporting stable, affordable energy supply for American consumers, particularly in lower-price environments. At the same time, AXPC members remain committed to responsible operations and continuous improvement in environmental performance. Environmental protection and energy affordability are not competing goals when policy is grounded in statutory authority, emphasizes workable requirements, and delivers predictable and durable outcomes.

With these principles in mind, AXPC offers the following 2026 Policy Roadmap to support energy affordability, strengthen U.S. competitiveness, and enable responsible domestic oil and natural gas development.

GUIDING PRINCIPLES FOR 2026

The 2026 roadmap is grounded in several core principles:

- **Affordability:** Federal policy should reduce structural costs and prevent unnecessary constraints that increase prices for families and businesses.

- **Security:** America must be able to supply its own energy needs and support allies with dependable energy exports, reducing reliance on adversarial or unstable foreign sources.

- **Reliability:** Energy systems must deliver consistent, dependable supply across market conditions, weather events, and economic cycles to support households, industry, and critical infrastructure.

- **Predictability and Certainty:** Regulatory frameworks must provide clear, statutorily grounded pathways for qualified projects to reach approval and ensure that lawful approvals, once issued, are durable and can be relied upon over time.

- **Workability and Consistency:** Requirements and compliance expectations should be practical, clearly defined, and applied consistently to support efficient operations and sustained investment—particularly in lower-price environments.

- **Government Efficiency:** Federal processes must reduce delay, duplication, and litigation risk that inflate costs without improving results.

- **Environmental Stewardship:** Environmental protections should be advanced through accurate, workable, and technology-neutral policies that encourage real-world improvements.

- **Global Competitiveness:** Fiscal and trade policy should incentivize capital investment in domestic energy development, production, and infrastructure, while mitigating external costs amid global market volatility.

Note: The recommendations in this AXPC 2026 Policy Roadmap focus on policy priorities and initiatives that directly affect the responsible onshore exploration, development, and production of oil and natural gas in the United States. Many other policies and regulatory measures not addressed in this report can also significantly influence U.S. energy production—directly or indirectly—by regulating other segments of the energy and power sectors. These include environmental regulations, international trade agreements, and broader economic policies that shape the operating environment for U.S. oil and natural gas production, energy reliability, and affordability for the American people and U.S. allies. Consideration of these broader issues extends beyond the scope of this roadmap and is more fully addressed in the recommendations of partner organizations representing those stakeholders, including but not limited to the American Petroleum Institute, the National Ocean Industries Association, the Offshore Operators Association, the U.S. Chamber of Commerce, the American Chemistry Council, and the National Association of Manufacturers.

AXPC'S 2026 POLICY ROADMAP
SUSTAINING AMERICAN ENERGY COMPETITIVENESS

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RECOMMENDED 2026 POLICY PRIORITIES

Energy is a global commodity and a global necessity. Growing demand—both at home and around the world—will be met by someone. The central question for U.S. policymakers is whether that demand is met by responsibly produced American oil and natural gas—supporting affordability, economic growth, and national security—or by higher-cost, higher-emitting supply from foreign competitors and adversarial nations.

Over the past year, executive direction has helped reset expectations across federal energy policy by emphasizing statutory alignment, reduced regulatory burden, and more disciplined permitting implementation. Early actions focused on reviewing regulatory constraints, reinforcing predictable decision-making, and advancing implementation of reforms already enacted. Together, these steps helped restore momentum toward greater efficiency and certainty across federal permitting programs, with implementation continuing into 2026.

Congressional and judicial actions have furthered this progress. In 2025, Congress enacted the One Big Beautiful Bill Act (OBBBA), which, among other key policies, reinforced federal oil and natural gas leasing, reduced discretionary decision-making within the Department of the Interior, and established clearer statutory standards governing onshore mineral development, including commingling approvals. Together, these reforms improved predictability, constrained open-ended agency discretion, and strengthened the foundation for timely energy production. In *Seven County Infrastructure Coalition v. Eagle County*, the Supreme Court reaffirmed NEPA's procedural nature and limited required analysis to the direct effects of the proposed federal action. In *Loper Bright Enterprises v. Raimondo*, the Court reinforced the role of courts in interpreting statutes rather than deferring to shifting agency interpretations. Taken together, these reforms marked important steps toward improving federal permitting programs and realigning them with statutory intent.

In 2026, federal policymakers have an opportunity to build on this progress by strengthening the conditions that allow domestic energy production to deliver affordable, reliable energy for American families and businesses. The following policy priorities identify the actions needed to lower structural costs, reduce unnecessary delay and uncertainty, and reinforce regulatory systems that support timely investment while maintaining environmental protections.

Promote Energy Affordability Through the Global Competitiveness of U.S. Oil and Natural Gas

Oil and natural gas are essential to modern life. They underpin the cost of transportation, electricity, heating, manufacturing, agriculture, and consumer goods across the economy. As a result, energy affordability is closely tied to economic competitiveness and household financial stability. Robust American energy exports also strengthen the U.S. balance of trade by reducing the trade deficit, generating significant export revenues, and reinforcing America's role as a reliable global supplier of essential commodities.

U.S. oil and natural gas are produced under some of the highest environmental and safety standards in the world and at a scale sufficient to influence global markets. When domestic production is allowed to operate efficiently, it helps stabilize supply, moderate price volatility, and reduce reliance on less secure or higher-emitting sources of energy. Conversely, policies that unnecessarily delay infrastructure, restrict access to resources, or raise costs without commensurate benefits can tighten supply and place upward pressure on prices paid by American families and businesses.

In 2026, policymakers should continue to provide clear and consistent signals that responsible U.S. oil and natural gas production and exports serve the national interest. Trade, investment, and regulations should align with energy affordability, reliability, and security objectives, while avoiding approaches that shift production overseas and weaken U.S. competitiveness.

Prioritize Meaningful Permitting Reform to Reduce Delay and Lower Costs

Outdated permitting processes remain one of the most significant drivers of higher energy costs. Delayed approvals idle rigs, stall infrastructure, disrupt supply chains, and increase financing and contractor costs—often without delivering proportional benefits. As a result, permitting reform remains central to sustaining energy affordability and reliability in 2026.

A central objective of permitting reform is predictability and certainty across the full project lifecycle. Developers must have confidence that legitimate, qualified projects can proceed through federal review under clear, statutorily grounded standards, reach timely decisions, and avoid open-ended delays or shifting requirements. Consistent application of statutory criteria is essential to moving projects from application to approval. Equally important is certainty once approvals are granted. Projects that complete environmental review and receive lawful authorization must be able to rely on those decisions without undue delay, repeated procedural challenges, or discretionary reconsideration absent new material information, demonstrable legal deficiency, or judicial direction. A permitting system that delivers decisions without durable outcomes increases risk, raises the cost of capital, and ultimately places upward pressure on energy prices paid by American families and businesses.

Permitting frameworks must also function efficiently within and across agencies and across the full range of federal approvals, from large infrastructure projects to routine authorizations. This includes appropriate limits on duplicative or serial litigation and procedural reopenings that prolong uncertainty after reviews are complete. Reducing duplication and unnecessary delay is essential to restoring predictability and allowing investment decisions to move forward. A permitting system built on predictable approval pathways, durable outcomes, and clear limits on unnecessary delay will better support responsible energy development and infrastructure investment—while helping keep energy affordable for American families and businesses.

Improve Regulatory Frameworks to Support Greater Efficiency, Workability, and Durability

America's independent oil and natural gas producers operate under comprehensive federal and state regulatory frameworks that reflect the importance of environmental protection and public health. At the same time, unworkable requirements and unpredictable processes increase risk, strain resources, and complicate long-term planning—ultimately raising costs for consumers.

Independent producers depend on regulatory frameworks that establish clear, stable compliance obligations over time. Regulatory volatility—whether through reinterpretation of existing rules, shifting compliance expectations, or retroactive enforcement positions—discourages investment and raises the cost of capital, even when underlying demand for energy remains strong. Producers must be able to rely on clearly articulated regulatory requirements, consistent application of statutory standards, and established interpretations in effect at the time investments are made. Regulatory systems that provide durable compliance expectations allow companies to plan, invest, and operate responsibly while sustaining domestic energy supply.

For 2026, agencies should continue efforts to ground regulations firmly in statutory authority, ensure requirements are implementable in real-world operating conditions, and avoid unnecessary rulemaking cycles that perpetuate uncertainty. Regulatory stability and workability are essential to reducing risk, supporting investment, and maintaining affordable, reliable energy supply.

Unlock America's Federal Energy Resources

Federal leasing and development of taxpayer-owned resources generate significant public benefits, including lower energy costs, high-quality jobs, and billions of dollars in federal, state, and local revenues that support schools, infrastructure, and conservation programs. Domestic production from federal lands also strengthens U.S. energy security by reducing reliance on foreign supply and providing stable energy resources to support allies. Expanding responsible access to additional federal acreage that is currently constrained or administratively restricted can further enhance these benefits.

Today's federal production is the result of yesterday's leasing. Consistent and predictable access to federal resources is essential to meeting future energy demand and maintaining affordable energy supplies. Federal leasing policies should adhere to congressional intent, maintain regular and predictable lease sales, and recognize the value of taxpayer-owned resources. Transparent decision-making and timely permitting support state and local revenues, sustain jobs, and provide the certainty needed for long-term planning. Administrative approaches that function as de facto withdrawals—without statutory authorization—undermine supply and increase costs for consumers. In 2026, continued focus on responsible resource access and multiple-use land management can support energy affordability while maintaining environmental stewardship.

Build Smarter, Faster Agency Systems and Processes

Efficient government processes are essential to deliver affordable energy. Federal systems should minimize unnecessary burden, delay, and duplication that serve only to inflate costs and slow

progress without improving public-interest outcomes. Reducing inefficiency lowers structural costs and is especially important in lower-price and cost-constrained environments.

For 2026, federal agencies should focus on regulatory systems that are fit for purpose and function effectively in practice. System and process improvements should pursue clear objectives without duplicative requirements, serial workflows, or unnecessary procedural complexity. Over-engineered processes and systems that attempt to address every conceivable issue through a single framework often create more opportunities for delay, strain limited agency resources, and raise compliance costs without improving outcomes.

Sound system design should emphasize efficiency and focus on the specific use-case, leveraging existing expertise. Federal agencies such as the BLM should explore opportunities to defer to well-designed state regulatory programs when the federal programs are duplicative, such as in expediting NEPA reviews and well permitting for development on federal lands. Right-sized systems and processes reduce cost and support affordable, reliable energy supply.

Power Grid Reliability with American Natural Gas

Reliable energy supply depends not only on production, but on the ability to deliver fuel to consumers and power generators when and where it is needed—particularly during extreme weather events, peak demand periods, and system stress. As natural gas plays an increasingly central role in electricity generation and manufacturing, and as domestic power demand continues to grow, adequate infrastructure capacity, storage availability, and effective gas–electric market alignment are critical to maintaining grid reliability and energy affordability. In several regions, infrastructure constraints, limited storage, and misaligned gas–electric market structures have contributed to price volatility and reliability risk, even when upstream supply is abundant. Policies, like those set forth in this document, that enable timely development of pipelines, storage, and related midstream infrastructure are essential to preserving affordable and dependable energy for American families and businesses.

In 2026, policymakers should reinforce the role of natural gas as a foundational reliability resource by reducing barriers to infrastructure development and supporting policies that appropriately value reliability attributes. A reliable and resilient energy system that can withstand weather events and growing demand is essential to sustaining affordable energy, supporting domestic investment, and reinforcing American energy competitiveness.

FEDERAL POLICY ACTIONS COMPLETED IN 2025

Several federal policy actions previously identified as priorities for reform were completed, withdrawn, or otherwise resolved in 2025 through a combination of congressional action, administrative decision-making, and judicial developments. Together, these actions represent meaningful progress toward a more predictable and workable policy environment and provide a stronger baseline entering 2026

- **OBBBA Reforms to Federal Leasing and Mineral Development**
  OBBBA enacted statutory reforms reinforcing federal oil and natural gas leasing and constraining discretionary permitting and mineral management practices within the

Department of the Interior. The Act established clearer statutory standards governing onshore mineral development, including commingling approvals, improving predictability, reducing delay, and strengthening the foundation for timely domestic energy production.

- **Equitable Tax Treatment for Oil and Natural Gas Investment**
  OBBBA corrected the disparate tax treatment of intangible drilling costs (IDCs) — the largest share of capital investment for new oil and gas production — for operators subject to the corporate alternative minimum tax (CAMT). In the 2022 Inflation Reduction Act, America's independent producers lost the ability to fully deduct IDCs under CAMT. The OBBBA restored the immediate deductibility of these capital expenses and ensured fair and equitable tax policy across investment-intensive industries.

- **Rolling Back the Punitive Policy of the Methane Tax**
  Congress addressed the methane tax — a punitive policy that would have imposed significant new costs and uncertainty on top of existing methane regulatory requirements. First, Congress passed a Congressional Review Act resolution to nullify the 2024 regulations and then the OBBBA delayed any future implementation and collection for ten years.

- **CEQ NEPA Regulations Revoked**
  The Council on Environmental Quality rescinded its government-wide NEPA implementing regulations, realigning environmental review with statutory intent and recent judicial guidance on the appropriate scope of analysis. As a result, federal agencies are revising or have revised their own NEPA procedures to reflect this shift, emphasizing more streamlined reviews and procedures consistent with agency mission and statutory authority. Replacing a policy-driven framework with a statute-based approach improved predictability and discipline in federal environmental review.

- **Reissuance of Critical Clean Water Act Section 404 Nationwide Permits**
  The Army Corps of Engineers reissued critical Nationwide Permits, restoring streamlined authorization for categories of activities with minimal individual and cumulative environmental impacts. These permits reduce permitting time, uncertainty, and administrative burden for routine infrastructure activities associated with energy development, including linear infrastructure, maintenance, and upgrades. Reestablishing this program provides a functional, predictable permitting pathway while maintaining environmental protections.

- **LNG Export Permit Reviews Resumed**
  The Department of Energy lifted the prior pause on LNG export permit reviews and returned to regular order under the Natural Gas Act. Resumption of permit processing restored a predictable pathway for LNG projects and reinforced the role of U.S. natural gas in supporting domestic energy affordability, reliability, and global energy security.

These completed actions provide a stronger regulatory baseline entering 2026, narrowing outstanding issues and allowing agencies and policymakers to focus on finishing and stabilizing remaining priorities. Bringing major rulemakings and reconsiderations to resolution this year will reduce uncertainty, establish settled expectations, and ensure existing policies function as intended—supporting affordable, reliable energy production and a durable foundation for future policy development.

ADMINISTRATIVE RECOMMENDATIONS FOR 2026

Federal agencies play a central role in shaping the cost, timing, and feasibility of domestic energy production through rulemaking, permitting, enforcement, and program implementation. Entering 2026, many major federal energy rules remain under development or reconsideration. Completing this work in the year ahead is critically important, as these rules will define regulatory certainty, influence investment decisions, and affect energy affordability across the economy.

Across agencies, significant regulatory initiatives and reconsiderations are already underway. The priority for 2026 should be to bring these efforts to resolution in a manner that is workable, transparent, and capable of being implemented at scale. Prolonged transition periods and repeated revisions increase uncertainty and cost—particularly in price-constrained environments—and can delay investment without improving outcomes. Administrative actions should focus on how policies operate in practice. Inefficient systems, duplicative reviews, and unclear decision-making processes can raise costs and idle capital even when underlying policy objectives are sound. Attention to implementation quality and program performance can materially improve outcomes while maintaining environmental protections.

In 2026, administrative actions should continue to support energy affordability and reliability by prioritizing regulatory stability, effective implementation, and predictable outcomes. Emphasizing workability and real-world performance will help ensure administrative actions support affordable, reliable energy production over the long term.

Priority Regulatory Actions in 2026 to Advance American Energy Competitiveness

(Listed by Agency)

In 2026, rulemaking priorities should center on completing and stabilizing this body of work. Completing priority rulemakings in 2026 will also establish a stable foundation for future policy development later in the Administration. Regulatory clarity and predictability support thoughtful consideration of new initiatives over time, while helping limit cumulative cost impacts and reinforcing affordable, reliable energy production.

Environmental Protection Agency

- **Oil and Gas Methane and VOC Rules (OOOOb/c) — Finish Reconsiderations**
  EPA's OOOOb and OOOOc rules represent one of the most significant Clean Air Act (CAA) regulatory cost drivers for the onshore oil and natural gas sector. While reducing methane emissions remains an important objective, the final rules adopted in 2023 imposed highly prescriptive requirements that do not adequately account for operational variability, asset age, basin-specific conditions, or the realities of mature and marginal production. As implemented, these requirements risk accelerating production shut-ins, increasing compliance costs, and diverting capital from higher-impact emissions reduction opportunities.

  Following finalization of the rule, EPA granted reconsideration in 2024 on a limited set of discrete technical issues and subsequently proposed a narrow reconsideration addressing

those issues later that year. That proposal remains pending. In 2025, EPA also issued an interim final rule, followed by a final interim final rule, to extend certain compliance deadlines and provide near-term regulatory stability while the reconsideration process moves forward. EPA has been actively working to address implementation challenges during this period and has indicated that the initial reconsideration was intentionally narrow, with a broader reconsideration of additional elements of the OOOOb/c framework expected to follow.

During this transition, regulated entities and state and tribal implementing agencies have been operating under evolving requirements. EPA's interim actions have provided important flexibility and additional time for state programs to adjust, but further alignment may be necessary once the initial reconsideration is finalized and broader revisions are considered. Additional implementation time and clear transition guidance will be important to ensure that state and tribal programs can fully incorporate final requirements before assuming primacy under OOOOc, supporting consistent implementation and avoiding unnecessary disruption.

For 2026, EPA should prioritize finalizing the initial narrow reconsideration and providing clear, consolidated guidance on compliance and reporting obligations during the transition period. EPA should also move promptly to initiate and complete the broader reconsideration needed to address remaining workability, cost, and flexibility concerns in the OOOOb/c framework. This process should ensure adequate implementation timelines for state programs, avoid duplicative or conflicting requirements, and incorporate greater flexibility for low-producing and mature assets. A more performance-based, risk-focused approach—coordinated with state implementation—would improve regulatory certainty, preserve meaningful emissions reductions, and support continued responsible domestic energy production.

Greenhouse Gas Reporting Program and Subpart W — Reconsider and Provide Transition Clarity

Historically, EPA's Greenhouse Gas Reporting Program, and Subpart W in particular, provided a foundational baseline for emissions data across the oil and natural gas sector. A consistent, mandatory reporting framework supports data quality, comparability, and transparency, while reducing the risk of fragmented state-level requirements. Subpart W data also plays an important role beyond reporting, informing implementation of other federal programs, supporting access to tax credits, and enabling credible benchmarking and market participation.

Following revisions to Subpart W finalized in 2024, EPA granted reconsideration earlier this year in response to administrative petitions raising feasibility and accuracy concerns. While that reconsideration remains pending, EPA subsequently proposed broader changes to the GHGRP, including rescission of certain reporting requirements and a ten-year delay of Subpart W. These actions have introduced additional uncertainty regarding the future structure of the program and the treatment of Subpart W reporting during the transition period, even as EPA has continued engagement with stakeholders on technical issues associated with the rule.

During this period, regulated entities have been evaluating how potential changes to the GHGRP Subpart W could affect future reporting obligations and their interaction with related federal programs, including methane standards and other regulatory frameworks. Subpart W reporting also intersects with requirements associated with tax credit eligibility under sections 45Q and 45V, as well as with market, contractual, and international reporting expectations. Treasury has issued interim guidance to ensure continued access to the Section 45Q carbon

capture credit in the event of reporting gaps, highlighting the importance of maintaining clear, workable, and coordinated federal reporting and verification pathways during periods of regulatory transition. Still, uncertainty regarding the structure or timing of Subpart W continues to raise important considerations beyond the reporting program itself.

For 2026, EPA should continue reconsideration of the 2024 Subpart W revisions and implementing targeted technical fixes that improve accuracy, flexibility, and feasibility. This should include allowing optional use of newer methodologies, aligning reporting requirements with other EPA air programs, and providing clear guidance to ensure continuity of data and reporting practices. If EPA finalizes the GHGRP rescission and subpart W pause as proposed, the agency should take steps to ensure that future technical fixes to subpart W remain durable, such as the preservation of underlying data processing systems and continuity. This could also include coordination with other federal and voluntary efforts. In either case, timely completion of the reconsideration should remain a priority to provide a durable path forward.

- **CWA Section 401 Certifications Rule — Finalize and Reform**
  The Clean Water Act (CWA) Section 401 certification process has increasingly been used to delay or obstruct federally permitted energy and infrastructure projects by expanding review beyond its statutory purpose of evaluating water quality impacts from discharges—creating uncertainty, prolonged timelines, and duplicative requirements that increase costs without improving water quality outcomes. In 2025, EPA took initial steps to address these concerns by issuing guidance and initiating a formal rulemaking process to replace the 2023 rule. EPA proposed revisions would narrow the scope of certification review, clarify the limits of certifying authority, and reinforce timely decision-making, representing meaningful progress toward reducing unnecessary delay and aligning the program with congressional intent.

  At the same time, continued oscillation between administrations on this regulatory framework underscores that long-term certainty may ultimately require a legislative solution. For 2026, EPA should prioritize finalizing this rulemaking in the near term. Additionally, the administration should work with Congress to clarify the scope, timing, and limits of Section 401 review in statute in order to provide longer-term predictability for permitting outcomes, reduce recurring regulatory whiplash, and support efficient and responsible delivery of energy.

- **Beneficial Reuse of Produced Water – Advance and Enable**
  Produced water management is one of the largest cost drivers for onshore oil and natural gas production, particularly in water-constrained regions. Produced water reuse presents a unique opportunity to advance the Administration's energy and AI infrastructure priorities while delivering meaningful environmental benefits. Expanded reuse — whether through recycling treated water for industrial applications or other beneficial uses — can reduce freshwater demand in water-constrained regions, alleviate disposal-related pressures such as induced seismicity risks, and support water-intensive industrial growth, including emerging data center development. Unlocking these benefits requires regulatory clarity that enables innovation while appropriately managing risk.

  For 2026, policy efforts should reinforce state leadership in permitting and managing produced water reuse programs, recognizing that states are best positioned to account for local hydrology, geology, water demand, and operational conditions. As produced water management technologies continue to evolve, any regulatory adjustments should be carefully

evaluated to avoid unintended consequences across related programs, including waste management and water quality frameworks. Many solutions that would expand reuse of produced water do not require regulatory changes. While EPA should continue to evaluate whether existing regulations are a burden for produced water reuse, expanded reuse should also be accomplished through federal-state coordination and empowering states to develop risk-based permitting opportunities.

- **CWA WOTUS Rule — Finalize and Implement**
  Uncertainty surrounding the scope of federal Clean Water Act (CWA) jurisdiction continues to create permitting risk, delay, and litigation exposure for energy and infrastructure projects. Although the Supreme Court's decision in Sackett v. EPA significantly narrowed the circumstances under which wetlands and other waters may be considered jurisdictional, inconsistent interpretation and evolving regulatory approaches have prolonged uncertainty—particularly for ephemeral or intermittent features and non-adjacent wetlands common in many producing regions.

  In 2025, the agencies issued a proposed rule to update the definition of "Waters of the U.S." (WOTUS) with the stated goal of providing a clearer and more durable framework aligned with Sackett. The proposal is intended to improve predictability and consistency in jurisdictional determinations and permitting. For 2026, agencies should prioritize finalizing this rulemaking and ensuring that the final definition is implemented consistently across regions. The final rule and accompanying guidance should clearly operationalize the limits articulated in Sackett, reduce case-by-case uncertainty, and avoid reintroducing expansive interpretations that increase delay and litigation risk without improving water quality outcomes. Clear and disciplined implementation is essential to supporting timely permitting, efficient infrastructure development, and responsible energy production while maintaining core CWA protections.

Bureau of Land Management

- **Conservation and Landscape Health Rule — Finalize Rescission**
  The Conservation and Landscape Health Rule inappropriately established by regulation new authorities within agency land use planning, mitigation, and project approval processes on federal lands, including the introduction of "conservation as a use" within BLM's multiple-use framework. The rule raised serious concerns by expanding agency discretion to be able to effectively withdraw lands from traditional uses that had already been made available through extensive public planning processes, undermining congressional intent for leasing, permitting, and development on federal lands.

  In 2025, BLM took important steps to reassess this approach, proposing rescission of the rule in recognition of these concerns and the need to realign federal lands policy with statutory multiple-use requirements. Completing the rescission is necessary to reestablish clear limits on agency discretion, prevent de facto withdrawals of lands designated for development, and ensure federal land use decisions operate consistent with statutory multiple-use requirements.

- **Onshore Commingling Regulations — Update and Align**
  Commingling authority is essential to efficient development on federal lands, enabling operators to combine production from multiple leases or zones in ways that support operational efficiency, minimize surface impacts, and improve reservoir management while

maintaining royalty accountability. Historically, BLM's commingling approval process was rigid and time-consuming, creating permitting and compliance friction even in routine scenarios.

In 2025, however, the One Big Beautiful Bill Act (OBBBA) directed the Department of the Interior to more broadly approve onshore commingling applications, and BLM issued initial guidance to implement this statutory direction and facilitate more timely approvals. These actions represent an important step toward modernizing commingling policy and addressing long-standing inefficiencies. While this interim guidance has improved near-term processing, a durable regulatory framework has not yet been completed.

For 2026, BLM should prioritize proposing and finalizing commingling regulations that fully implement OBBBA and provide clear, predictable approval pathways. This effort should be closely coordinated with ONRR to ensure commingling approvals, allocation methodologies, and royalty accounting expectations are aligned in practice. BLM should also update related site security and measurement regulations, modernize the process for approving production measurement technologies, and ensure implementation emphasizes compliance and clarity rather than enforcement-first or "gotcha" audits. Completing these steps would lock in the benefits of OBBBA, support efficient development, and provide regulatory certainty for operators and regulators alike.

Onshore APD Permitting — Streamline and Modernize

Applications for Permit to Drill (APDs) account for the vast majority of BLM's oil and natural gas permitting workload and are central to the timing, cost, and predictability of onshore development. Although APDs are often routine and repeatable actions in established producing areas, they have historically been subject to prolonged review timelines, duplicative analysis, and inconsistent treatment across field offices—delaying development, idling capital, and increasing costs without commensurate environmental benefit.

In 2025, several developments laid the groundwork for meaningful improvement. Supreme Court decisions and subsequent agency actions reinforced the appropriate scope of environmental review. In addition, executive direction instructed BLM to evaluate permit-by-rule and other standardized approval approaches for routine APDs, signaling an interest in reducing unnecessary process burdens and improving permitting efficiency.

For 2026, BLM should prioritize implementing these authorities and advancing a streamlined APD permitting framework for routine drilling activities. This should include fully leveraging expanded categorical exclusions, advancing permit-by-rule or standardized approval pathways where appropriate, and improving transparency and system performance to reduce rework and delay. BLM should also address avoidable administrative bottlenecks that constrain permitting throughput, including removing the $25,000 per day transaction limit on pay.gov, which currently restricts the number of APDs an operator can submit in a single day, creating unnecessary processing delays. Together, these steps would allow BLM to better focus resources on higher-impact reviews, improve permitting timelines, add project certainty, and support responsible energy development while maintaining environmental protections.

- **BLM Automated Fluid Minerals Support System (AFMSS) — Replace and Modernize**

  The Automated Fluid Minerals Support System (AFMSS) is BLM's required electronic platform for processing Applications for Permit to Drill (APDs), sundry notices, and well completion

reports for federal oil and natural gas operations. A functional, reliable permitting system is essential to timely permit review, transparency, and effective coordination between operators and BLM field offices. In practice, AFMSS has experienced persistent technical failures, usability issues, and data integrity problems that have imposed significant burdens on both permit applicants and agency staff.

These challenges have contributed to prolonged permitting timelines, inaccurate tracking of permit information and application status, and inefficiencies that divert resources away from substantive review. Multiple Government Accountability Office reports have identified deficiencies in the development, oversight, and performance of AFMSS, and BLM has acknowledged the system's failure. In 2025, BLM acknowledged ongoing deficiencies in AFMSS II and began evaluating options to improve or replace the system.

For 2026, BLM should prioritize delivering a modern, fit-for-purpose permitting system designed specifically to support these specialized federal oil and gas workflows. BLM should engage industry stakeholders, agency staff involved in permitting for the more active BLM offices, and state regulators. The effort should emphasize clear improvement needs and requirements for efficient permitting and leadership accountability for the project, as well as industry engagement with system users. BLM should also address any procurement or administrative constraints that limit access to specialized technical expertise or delay system delivery. Successful revamp of AFMSS is essential to improve permitting timelines, reduce administrative friction, and restore confidence in BLM's permitting processes.

- **Waste Prevention Rule — Rescission or Targeted Revision**
  This rule creates a system for determining when loss of gas was avoidable or unavoidable from oil and gas operations; and then determines when royalties are due on such lost gas. In the final rule, BLM created several new technical requirements that were not made subject to notice and comment. BLM also refused to align its definitions with decades-old definitions for oil wells and gas wells. As a result, the Rule converts operational variability into royalty exposure, creating uncertainty for federal leaseholders regarding compliance obligations and financial liability. As a result, this rule has become confusing and difficult to implement. This is in addition to inspection and recordkeeping requirements that are duplicative with EPA rules.

  The Rule is currently subject to ongoing litigation. In 2024, a federal district court granted a preliminary injunction in favor of several plaintiff states, blocking enforcement of the rule in those states. In 2025, the litigation was held in abeyance while the agency evaluates the rule and considers next step. In the Spring 2025 Unified Agenda, BLM listed plans to rescind the Waste Prevention Rule, reflecting agency intent to withdraw the rule rather than proceed with full implementation under the existing framework.

  Given the scope of the deficiencies identified and the current litigation, the Waste Prevention Rule warrants resolution. The agency should complete the rescission process or replace the rule with a substantially narrower framework limited to clear instances of avoidable waste, without duplicative compliance obligations or royalty exposure unrelated to actual waste.

U.S. Fish & Wildlife Service

- **ESA Section 7 Interagency Consultation Regulations — Finalize and Clarify**
  Section 7 consultation of the Endangered Species Act (ESA) plays a central role in federal permitting, but evolving interpretations of consultation triggers, effects analysis, and mitigation authority have increased timelines and uncertainty. Expanded consultation scope and mitigation expectations have raised costs without corresponding improvements in conservation outcomes. In 2025, FWS and National Marine Fisheries Service (NMFS) proposed revisions to the Section 7 regulations intended to clarify consultation standards, improve efficiency, and restore consistency with statutory authority. For 2026, the Services should finalize these revisions and issue implementation guidance that promotes timely, predictable consultations. Clarifying consultation triggers, effects analysis, and permissible conservation measures would reduce delay and litigation risk while enhancing project certainty and preserving the integrity of the consultation process.

- **ESA Blanket 4(d) Rule for Threatened Species — Rescind and Replace**
  The automatic application of "endangered species" level prohibitions to species listed as threatened has blurred statutory distinctions and increased compliance uncertainty for regulated activities. By extending prohibitions broadly regardless of species-specific conservation needs, this approach has contributed to litigation risk and permitting delays without clear conservation benefit. In 2025, FWS proposed rescinding the blanket 4(d) rule and restoring a tailored, species-specific approach to threatened species protections, reflecting the ESA's flexibility to calibrate protections based on conservation needs rather than applying prohibitions automatically. For 2026, FWS should finalize this rulemaking and implement a clear framework for developing species-specific 4(d) rules where appropriate. A tailored approach would improve predictability, reduce unnecessary permitting friction, and better focus conservation efforts on measures that meaningfully support species recovery.

- **ESA Regulations for Listings and Critical Habitat — Finalize and Implement**
  Shifting approaches to species listings and critical habitat designations under the ESA have increased regulatory uncertainty and litigation risk, contributing to delays for energy and infrastructure projects. Expansive designations—including areas that may not currently function as habitat—have increased permitting complexity without clear conservation gains. In 2025, FWS, jointly with NMFS, proposed revisions to the ESA regulations governing listing determinations and critical habitat designation to clarify standards, improve transparency, and better align implementation with statutory requirements and judicial guidance. For 2026, FWS should prioritize finalizing these revisions and ensuring consistent implementation. The final rule should provide clear criteria for designating critical habitat, appropriately distinguish between occupied and unoccupied areas, and ensure that economic and other relevant impacts are meaningfully considered as required by statute.

- **ESA Section 4(b)(2) Exclusions — Clarify and Implement**
  The ESA requires consideration of economic and other relevant impacts when designating critical habitat and allows exclusions where the benefits of exclusion outweigh the benefits of inclusion. In practice, unclear standards for applying Section 4(b)(2) have limited its effectiveness and contributed to inconsistent outcomes and litigation risk. In 2025, FWS

proposed revisions to clarify how Section 4(b)(2) exclusions are evaluated and applied, including the role of economic impacts and other relevant considerations, with the goal of improving transparency and consistency. For 2026, FWS should finalize these revisions and ensure exclusion decisions are made using clear, objective, and reviewable standards. Consistent application would improve predictability and support balanced decision-making that advances conservation goals while accounting for economic and infrastructure impacts.

- **ESA Definition of "Harm" and Incidental Take — Clarify and Implement**
  Uncertainty surrounding the definition of "harm" and the scope of incidental take has expanded permitting risk and litigation exposure for otherwise lawful activities. Regulatory interpretations have increasingly treated indirect habitat modification as prohibited harm, even where causal connections are attenuated, broadening liability and compliance obligations. In 2025, FWS proposed revisions to the regulatory definition of "harm" to better align implementation with statutory limits and judicial precedent, emphasizing foreseeability and a more direct causal connection between actions and injury to listed species. For 2026, FWS should finalize this rulemaking and provide clear implementation guidance to ensure consistent application. Clarifying when habitat modification constitutes prohibited harm would reduce uncertainty, limit speculative interpretations, and improve predictability for project planning.

- **ESA Section 10 HCPs and Incidental Take Permits — Streamline and Clarify**
  The ESA Section 10 program authorizes incidental take for otherwise lawful activities, but the Habitat Conservation Plan and incidental take permit process has become increasingly complex, time-consuming, and inconsistent across regions. These challenges can delay projects, increase costs, and discourage participation in voluntary conservation programs. In 2025, FWS initiated a review of the Section 10 program by issuing a request for information on improving implementation of HCPs, incidental take permits, and related conservation benefit agreements, signaling recognition of process barriers without yet proposing reforms. For 2026, FWS should advance concrete improvements to streamline and clarify the Section 10 program, including clearer timelines and expectations, narrower intra-Service consultation focused on authorized take, and greater certainty for approved permits. These changes would encourage voluntary conservation while reducing permitting delays. Reinforcing long-standing assurances associated with approved HCPs improves certainty by allowing permittees to rely on authorized activities without risk of reopening due to shifting interpretations.

- **Voluntary Conservation Programs — Propose and Improve**
  ESA voluntary conservation programs, including Habitat Conservation Plans and related Section 10 tools, are intended to encourage proactive conservation while providing regulatory certainty for landowners and project proponents. In practice, however, unclear program boundaries, broad review expectations, and limited flexibility have made these programs more complex and less predictable, reducing participation and limiting their effectiveness as alternatives to traditional permitting. In 2025, FWS solicited stakeholder input on how these tools are working and where improvements may be needed. For 2026, FWS should move forward with targeted changes to improve program workability and reliability. This should include clarifying the scope of Section 10 permits so they are focused on authorizing incidental take rather than regulating underlying activities, narrowing internal review to issues directly related to covered species, and reinforcing long-standing assurances that approved conservation plans will not be subject to shifting requirements. FWS should also consider options to support more regional, habitat-based, and state-led conservation approaches.

Strengthening these programs would encourage participation, improve predictability, and support conservation while reducing unnecessary complexity.

- **Migratory Bird Treaty Act (MBTA) — Clarify and Stabilize**
  The MBTA governs the protection of migratory birds, but long-standing disagreement over its application to incidental actions has created recurring uncertainty across lawful activities, including energy development, infrastructure, and land management. Shifting interpretations across administrations have resulted in inconsistent enforcement risk and limited predictability for regulated entities. In 2025, the FWS withdrew a prior advance notice of proposed rulemaking related to incidental take under the MBTA and reinstated, through a Solicitor's Opinion, an interpretation that the statute applies only to intentional actions. While this action reduced near-term uncertainty, reliance on sub-regulatory legal opinions has contributed to ongoing regulatory instability and does not provide a durable or uniform framework.

  For 2026, the Administration should pursue a more durable solution by establishing regulatory clarity on the scope of MBTA liability through rulemaking. Codifying the application of the MBTA to intentional actions, rather than incidental impacts, would provide consistent nationwide implementation, reduce recurring policy reversals, and ensure that conservation efforts are focused on activities that directly harm migratory birds. A regulatory approach would offer greater certainty for stakeholders while maintaining the statute's core conservation purpose.

Federal Tax and Trade Policy to Unlock American Energy Investment

America's independent oil and gas producers operate in one of the most capital-intensive and cost-sensitive sectors in American manufacturing. The cost of domestic production includes not only the upfront financial and human capital — endured over years with the risk of never materializing — but also the erratic inputs from operating in a dynamic commodity market with counterparties across the world. Couple that environment with increasing pricing pressure across the supply chain, and America's energy producers could, on a whim, sit at a global disadvantage.

In 2025, the Administration chartered a path toward American Energy Dominance, while Congress ensured a long-term investment runway by enacting critical fiscal policies in OBBBA. In 2026, fiscal and trade policy should further America's energy interests and ensure that its energy producers continue to operate in a globally competitive environment.

Enshrine a Pro-Investment Tax Environment

The OBBBA established generational reforms for America's energy producers, unlocking strategic assets, clearing unnecessary hurdles, and incentivizing immediate and long-term investment through common-sense tax policy. In addition to broad, pro-business fiscal measures — e.g., restoring 100% bonus depreciation and R&D expensing — the OBBBA fixed the disparate tax treatment of independent oil and gas producers and restored the immediate expensing of intangible drilling costs (IDCs) under the corporate alternative minimum tax (CAMT). The OBBBA also equalized the 45Q tax credit for carbon sequestration across underground storage and enhanced oil recovery (EOR). Taken together, both policies place America's independent producers on a more equal footing with sector peers and level the capital playing field.

Building on this pro-investment agenda, the Administration should ensure both policies are implemented to their fullest extent through durable regulation and in accord with existing authority. Moreover, the Department of Energy (DOE) should continue to partner with operators to explore, test, and prove the most efficient and productive uses of EOR in energy basins across the country. As implementation moves forward, federal tax policy should account for the infrastructure and deployment realities associated with bringing eligible projects to scale, including EOR. Clear and durable execution of these provisions will help sustain investment, support necessary infrastructure development, and reinforce domestic energy competitiveness.

Leverage Global Trade Policy for U.S. Energy Dominance

Robust domestic energy production provides America with a definitive global strategic advantage. Production at home ensures that America remains energy independent, and exports abroad ensure that America maintains energy superiority for the benefit of its allies and detriment of its adversaries. Central to our strategic advantage is global competitiveness in trade and the input costs associated with such policies.

Energy exports play a critical role in strengthening America's economic position. American oil and natural gas exports reduce the trade deficit, generate substantial export revenues, and support high-quality domestic jobs across the energy value chain. Policies that preserve and expand access to global markets for American hydrocarbons directly contribute to a more balanced trade posture while reinforcing national security and geopolitical stability.

Two recommendations run together: First, the Administration should continue to leverage our energy assets in current and future trade negotiations to address global trade imbalances. Second, any long-term tariff policy should account for both the benefits to American manufacturing writ large but also the possible offsets to American energy production. American energy dominance and American energy affordability hinge on growth in American energy production, which in turn hinges on increased investment. In a price-sensitive environment, every additional cost matters — whether that is labor in the field or the cost of equipment coming into it.

CONGRESSIONAL PERMIT REFORM FOR 2026

Modernize Federal Permitting to Streamline Processes and Improve Project Certainty

Outdated and litigation-prone federal permitting processes remain a significant structural driver of higher energy costs and delayed infrastructure. Despite recent progress, the federal permitting system continues to reflect expanded interpretations of statutory requirements, increasingly complex procedural demands, and a lack of finality that allows lawfully issued approvals to be delayed, suspended, or undone after projects have already moved forward.

Recent legislative, judicial, and administrative actions have begun to restore discipline to federal permitting by reinforcing statutory limits, narrowing the scope of environmental review, and improving the structure and focus of federal permitting programs. These developments represent meaningful progress and establish a stronger baseline entering 2026. However, they do not yet provide the certainty needed for projects to proceed with confidence. The needed fix is a

comprehensive, durable permitting framework that restores fidelity to statutory intent, limits procedural expansion driven by litigation risk, and delivers finality once approvals are issued.

Durable permitting reform that lasts beyond a single election cycle ultimately requires statutory action. The legislative recommendations outlined below would reduce recurring litigation risk, ensure that lawfully issued approvals are final and can be relied upon, and restore predictable permitting outcomes across federal programs. By modernizing outdated statutes and reinforcing the finality of federal permitting decisions, closing judicial loopholes, while maintaining strong environmental protection, Congress can strengthen U.S. competitiveness by enabling domestic energy and infrastructure projects to compete globally on cost, reliability, and speed—supporting affordable energy, sustained investment, and long-term economic security.

End Permitting Lawfare and Reform Judicial Review of NEPA

Congress should close remaining litigation loopholes that have allowed NEPA to be weaponized as a tool for delay rather than inform agency actions This includes clarifying standing requirements, establishing a uniform and reasonable statute of limitations for NEPA challenges, and codifying limits on judicial review consistent with recent Supreme Court precedent. These reforms would deliver some of the most meaningful gains in project certainty for approved projects, strengthening America's ability to develop and deliver affordable, reliable energy.

Modernize NEPA's Statutory Framework

Congress should modernize NEPA's statutory requirements to refocus environmental review on reasonably foreseeable, material impacts within an agency's jurisdiction. Legislative updates should prohibit speculative and subjective analysis, narrow the range of alternatives to those that are feasible and within agency control, limit NEPA applicability where federal involvement is minimal, and allow agencies to rely on functionally equivalent reviews conducted under other environmental statutes. These reforms would improve efficiency without weakening substantive environmental protections.

State-Led Permitting Where Federal Interests Are Limited

Permitting inefficiencies are particularly acute for oil and natural gas development on private surface where the federal government holds only a minority mineral interest within the spacing unit. Despite this limited stake, operators are still required to obtain a full federal Application for Permit to Drill (APD) and undergo extensive federal environmental review. This expands federal oversight well beyond the scope of the federal interest and imposes duplicative requirements on projects already comprehensively regulated by states. Congress should amend statute to eliminate the federal APD requirement for wells drilled on private or state surface where less than 50 percent of the minerals in the applicable drilling or spacing unit are federally owned. In these cases, development should proceed under state drilling permits and bonding requirements, with federal interests protected through production reporting, royalty payments, and other accountability mechanisms. Aligning federal oversight with the limited federal interest would reduce duplicative permitting, lower regulatory costs, support timely development, and help keep domestic energy supplies affordable while preserving environmental and revenue protections.

Streamlining Permitting Through Permit-by-Rule Approaches

Permitting delays and regulatory uncertainty remain a significant source of cost and inefficiency for oil and natural gas development, particularly for routine activities with predictable impacts that are already governed by well-established standards. Operators are often required to navigate lengthy,

discretionary permitting processes for activities that are largely identical to previously approved projects, increasing compliance costs, deferring investment, and slowing production without delivering meaningful environmental benefits. A permit-by-rule framework offers a more efficient and predictable alternative. Under this approach, activities that meet clearly defined eligibility criteria and comply with established environmental and operational standards are authorized by rule rather than through case-by-case permitting. For federal oil and gas development, permit-by-rule is well suited to activities with well-understood impacts, standardized mitigation measures, and a demonstrated record of safe operation. Eliminating individualized permits for these routine approvals would reduce administrative burdens, ease permitting backlogs, and allow agencies to focus limited resources on higher-risk or novel projects. A well-designed permit-by-rule framework maintains transparency and accountability while reducing delays, improving predictability, and supporting timely investment in domestic energy development.

Provide Statutory Certainty Under the Clean Water Act

Congress should clarify and stabilize Clean Water Act permitting requirements to improve predictability and prevent regulatory overreach. Legislation should define the scope and timelines of Section 401 water quality certifications, codify and protect nationwide permits under Section 404, and ensure that water quality reviews are not used to advance policy objectives unrelated to water quality. These reforms would reduce delay and uncertainty while preserving core environmental protections.

Inject Common Sense into ESA Implementation

Congress should modernize implementation of the Endangered Species Act to reduce unnecessary delay and litigation while maintaining species protection. Reforms should include curbing mass petition litigation, clarifying statutory definitions such as habitat, defining consultation triggers, streamlining Sections 7 and 10 processes, and limiting compensatory mitigation to clear statutory authority and proportional impacts. These changes would improve permitting efficiency without weakening substantive conservation standards.

Ensure Finality of Lawfully Issued Permits

Congress should reinforce the finality of federal permits and approvals once lawfully issued following completion of required environmental review. Legislation should clarify that permits may not be suspended, revoked, or reopened absent new material information, a demonstrable legal deficiency, or judicial direction. Providing reliable finality is essential to reducing investment risk and ensuring that approved projects can proceed as authorized.

Rationalize the Natural Gas Act

Congress should amend Section 3 of the Natural Gas Act to streamline LNG export approvals by removing or clearly defining the Department of Energy's public-interest determination for exports to non–free trade agreement countries. Clarifying this standard would reduce uncertainty, prevent duplicative review, and ensure that export approvals proceed in a timely and predictable manner.

Consider Targeted Clean Air Act Reforms

The Clean Air Act provides an essential framework for protecting air quality, but over time certain regulatory requirements have expanded beyond congressional intent in ways that have slowed or prevented the construction and modernization of energy and infrastructure projects critical to emissions reductions, reliability, and affordability. Broad interpretations of key statutory terms—embedded in both rulemakings and implementation—such as "modification," "start of

construction," and "affected facility," have increased cost, delay, and burden by extending requirements to activities where the regulatory costs can far exceed the associated environmental benefits. Clarifying these key concepts could improve consistency and workability across Clean Air Act programs. Congress may also wish to consider targeted reforms for nonattainment areas, where local sources can face escalating obligations and constrained permitting pathways even when attainment challenges are influenced by pollution transported from outside the region. Providing states with additional flexibility to account for emissions beyond their control, while maintaining enforceable air quality standards, could support more effective attainment strategies and avoid disproportionate burdens on local projects. Additionally, in some of these nonattainment areas, the objection process is being exploited to delay Title V permit timelines after extensive state review has concluded. Thoughtful refinements that preserve public participation while discouraging duplicative or unfocused objections could reduce frivolous delays and uncertainty while reinforcing compliance and transparency.

Solidify BLM Resources and Operational Support

The Permitting Performance Fund, enacted in 2016, enables fees for APDs to directly fund permit BLM processing operations and improvements and operates outside of the annual government-funding, appropriations process. The program expires at the end of 2026. Congress should extend the program for another ten years to ensure that BLM district offices are resourced and staffed to process federal permits for the development of oil and natural gas resources on federal lands.

ACRONYMS

- American Exploration Production Council (AXPC)
- Application for Permit to Drill (APD)
- Automated Fluid Minerals Support System (AFMSS)
- Bureau of Land Management (BLM)
- Clean Air Act (CAA)
- Clean Water Act (CWA)
- Council on Environmental Quality (CEQ)
- Endangered Species Act (ESA)
- Environmental Protection Agency (EPA)
- Department of Interior (DOI)
- Fiscal Responsibility Act of 2023 (FRA)
- Fish and Wildlife Service (FWS)
- Federal Land Policy Management Act (FLMPA):
- Greenhouse gas (GHG)
- Greenhouse Gas Reporting (GHGRP)
- Habitat Conservation Plan (HCP)
- Inflation Reduction Act (IRA)
- Methane Emissions Reduction Program (MERP)
- Mineral Leasing Act (MLA)
- National Environmental Policy Act (NEPA)
- National Historic Preservation Act (NHPA)
- Nationwide Permits (NWP)
- One Big Beautiful Bill Act (OBBBA)
- Office of Natural Resources Revenue (ONRR)
- Pipeline and Hazardous Materials Safety Administration (PHMSA)
- Resource Conservation and Recovery Act (RCRA)
- Securities Exchange Commission (SEC)
- Social Cost of Greenhouse Gases (SC-GHG)
- United States Army Corps of Engineers (Corps)
- Waste Emissions Charge (WEC)
- Waters of the United States (WOTUS)