

Proposed 2029 Memo: DOI Secretarial Review of Oil & Gas Permits, an Inverse of DOI Secretary Doug Burgum's Solar & Wind July 2025 Memo

On July 15, 2025, Department of the Interior (DOI) Secretary Doug Burgum's office circulated a [memo](#) to agency staff requiring that any decision, action, consultation, or other undertaking related to a solar and wind facility be reviewed by a series of senior officials and political appointees. This review, covering at least 69 specified actions, includes the Office of the Executive Secretariat, the Office of the Deputy Secretary, and the Office of the Secretary.

Under this unprecedented level of political scrutiny, not a single solar or wind energy project has been approved since the memo was issued. This gridlock undermines our ability to add much-needed power to the grid, bring energy costs down, and fight climate change.

Given the precedent the Trump administration has set with this memo, a future administration should consider taking similarly aggressive action. Specifically, future administrations may utilize the same authority to apply close scrutiny on facilities that extract or transport fossil fuels, which are the leading cause of air and water pollution, climate change and harm to environmental justice communities. To illustrate how such authority could be deployed for enhanced review of fossil fuel facilities in a future administration, we have developed the below template memo, incorporating Secretary Burgum's language.

PROPOSED MEMO:



United States Department of the Interior
OFFICE OF THE SECRETARY
Washington, DC 20240

[DATE]

Memorandum

To: Assistant Secretaries
Bureau and Office Heads

From: Senior DOI Official

Subject: Departmental Review Procedures for Decisions, Actions, Consultations, and
Other Undertakings Related to Oil, Gas, Gas Pipeline, and Coal Energy
Facilities

Consistent with Executive Order (EO) [XXXXX], entitled “Ending Market Distorting Policies for Unreliable, Foreign-Controlled Fossil Energy Sources,” EO [XXXXX], all decisions, actions, consultations, and other undertakings—including but not limited to the following—related to the exploration, development, transportation, production, or leasing of oil, natural gas, or coal, or related facilities, shall require submission to the Office of the Executive Secretariat and Regulatory Affairs, subsequent review by the Office of the Deputy Secretary, and final review by the Office of the Secretary:

1. *Federal Register* notices;
2. notices to proceed;
3. scoping reports;
4. determinations of National Environmental Policy Act (NEPA) adequacy;
5. draft and final environmental assessments;
6. draft, final, and supplemental environmental impact statements;
7. findings of no significant impact;
8. records of decision;
9. approval letters;
10. Applications for Permit to Drill (APDs) and associated approvals;

11. development plans, mine plans, and associated revisions;
12. land use plan amendments and revisions;
13. land withdrawals and revocations;
14. areas of critical environmental concern designations;
15. exploration permits for oil, gas, and coal;
16. proposed and final lease sale notices;
17. lease sales;
18. lease assignments;
19. lease issuances;
20. rights-of-way and easements for oil, gas, or coal exploration and development;
21. pipeline permit applications, including natural gas gathering, transmission, or distribution systems;
22. pipeline engineering reviews and safety evaluations;
23. preconstruction environmental surveys;
24. supplemental environmental reports;
25. temporary use permits;
26. access road authorizations;
27. utility corridor concurrences;
28. facility design reviews and engineering reports for pipelines, compressor stations, or processing plants;
29. construction and operation plans for oil, gas, and coal facilities;
30. conditions of pipeline or facility approvals;
31. revisions to approved plans;
32. Engineering and Technical Review Branch recommendation memos;
33. proposed technical, pipeline integrity, navigational, and aviation safety conditions;
34. subsurface geological and geophysical evaluations;

35. spill prevention, control, and countermeasure plans;
36. decommissioning applications and reclamation plans for wells, mines, and pipelines;
37. Mineral Leasing Act and Outer Continental Shelf Lands Act compliance memos;
38. compendium reports;
39. memoranda of agreement;
40. compensatory mitigation plans;
41. historic properties management plans;
42. historic properties treatment plans;
43. performance and reclamation bonding approvals;
44. royalty, rental, and cost recovery determinations;
45. cost recovery agreements;
46. financial assurances;
47. rights-of-use and easement;
48. right-of-way applications;
49. right-of-way grants;
50. right-of-way leases;
51. right-of-way transfers;
52. leases and ROWs on Tribal lands;
53. Tribal environmental impact reviews;
54. government-to-government Tribal consultations;
55. Wild and Scenic Rivers Act determinations;
56. National Trails System impact evaluations;
57. National Landscape Conservation System coordination;
58. visual impact assessments;
59. visual resource management analyses;

- 60. cumulative historic resources visual effects analyses;
- 61. cultural resource consultations;
- 62. section 106 compliance under the National Historic Preservation Act;
- 63. consultation under the Magnuson-Stevens Fishery Conservation and Management Act, Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), and Bald and Golden Eagle Protection Act (BGEPA);
- 64. permits under the ESA, MBTA, and BGEPA;
- 65. biological assessments;
- 66. biological opinions;
- 67. approval and publication of studies and assessments, including ecological and baseline environmental studies;
- 68. grants; and
- 69. any other similar or related decisions, actions, consultations, or undertakings.

These review procedures are effective immediately.

SIGNATURE

Cc: Deputy Assistant Secretaries
Bureau and Office Deputy Heads
Assistant Secretary Chiefs of Staff
Bureau and Office Chiefs of Staff