

Deterring Drilling without Approval (DWOA) Cases

DWOA prevention relies on sufficient deterrents, a fully informed public, and the involvement of BLM personnel. The following measures should serve to discourage and minimize DWOA cases.

- **Field Presence** – The BLM’s personnel will establish a regular and visible field presence. As operators and contractors become more aware of the scope of the BLM’s responsibilities and area of jurisdiction, the likelihood of a violation will decrease.
- **Timely and Appropriate Response** – The BLM will endeavor to quickly identify DWOA cases, address them aggressively with appropriate enforcement actions, and process them in a timely manner. This includes coordination with the BLM’s Office of Law Enforcement and Security, Special Investigations Group. Such actions will demonstrate that the BLM is serious about identifying, enforcing and resolving DWOA cases.
- **Bond Review and/ or Potential Bond Increase** – If DWOA occurs on a Federal leasehold, the field offices (FO) will perform an adequacy review on the lessee’s bond using the Bond Adequacy Review instructions and the Bond Adequacy Review Point System Worksheet in Washington Office IM 2013-151 Oil and Gas Bond Adequacy Reviews to determine if the BLM should adjust the operator’s bond – in most cases DWOA triggers a bond review as part of the consequence deterrence.
- **Publicize Enforcement Actions** – The BLM’s FO and State Office (SO) will work with the BLM Public Affairs staff to publicize successful DWOA enforcement actions through local papers, trade publications, and the BLM website.
- **Outreach** – The BLM’s FO and SO will consider taking advantage of outreach opportunities (e.g. conferences, workshops, etc.) to provide information to users and operators, associations, the public, Resource Advisory Councils, etc., on the environmental and public costs of DWOA and the enforcement actions taken on past cases.
- **Drainage Oversight** – The BLM role includes review of drainage program progress, to ensure identification of potential offending wells, including wells not permitted on Federal leases.