



# United States Department of the Interior

## OFFICE OF NATURAL RESOURCES REVENUE

P.O. Box 25165  
Denver, Colorado 80225-0165

IN REPLY REFER TO:  
7202.4-DOI-OS-2022-005932

April 27, 2023

Via email: [michelle@earthrights.org](mailto:michelle@earthrights.org)

Michelle Harrison  
1612 K St. NW Suite 800  
Washington D.C., DC 20006

Dear Ms. Harrison:

On May 5, 2020, you filed a Freedom of Information Act (FOIA) request seeking the following:

1. All communications and other records between January 2, 2017 and December 31, 2017, discussing or otherwise concerning the United States' participation in and/or implementation of the Extractive Industries Transparency Initiative ("EITI" or "USEITI"), including specifically the U.S. decision to withdraw as an EITI implementing country.
2. To the extent not already encompassed by Request #1, all documents supporting the statement in the November 2, 2017 letter from Gregory Gould that "U.S. laws prevent us from meeting specific provisions of the EITI Standard," and any other communications or records discussing this statement.

(Available at [https://www.doi.gov/sites/doi.gov/files/uploads/eiti\\_withdraw.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/eiti_withdraw.pdf)). For this request please include any responsive documents from November 9, 2016 to December 31, 2017.

For reference, this may include, but is not limited to, any records mentioning, citing, or discussing U.S. federal laws and regulations concerning disclosure of corporate tax information in connection with any requirement that extractive (oil, gas, or mining) companies' federal tax payments be disclosed.

Your request was received in the Office of the Secretary ("OS") FOIA office on May 6, 2020; it was acknowledged on May 6, 2020, and assigned control number: DOI-OS-2020-001129. You filed civil action number 22-cv-01503-CKK on June 1, 2022. With the litigation, the request was reassigned control number DOI-OS-2022-005932. We provided the sixth interim production on March 30, 2023.

We are writing today to provide the seventh interim response to your request. We reviewed 500 pages, 449 pages have been sent for consult with outside agencies and one file consisting of 51 pages is being provided in full.

Adrienne DiCerbo, Attorney-Advisor, in the Office of the Solicitor, was consulted in reaching this decision. Gary Johnson, Office of Natural Resources Revenue (ONRR), Government Information Specialist is responsible for making the withholding determinations.

If you have any questions about our response to your request, you may contact me by phone at 303-231-3962, or by email at [onrrfoia@onrr.gov](mailto:onrrfoia@onrr.gov).

Sincerely,

Gary Johnson  
Government Information Specialist  
ONRR FOIA

cc: [Adrienne.Dicerbo@sol.doi.gov](mailto:Adrienne.Dicerbo@sol.doi.gov)  
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