Holland & Hart



PRACTICES

Environmental
Environmental Litigation

INDUSTRIES

Energy and Resources
Oil and Gas
Data Centers

EDUCATION

University of Southern California Gould School of Law, J.D., 2011
High Honors
Southern California Review of Law and Social Justice Journal, Staff Member

Yale University, B.A., 2007

BAR ADMISSIONS

California
Montana
Indiana
Colorado

Rosario Hecht Domínguez (Doriott)

Partner

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When energy companies confront consequential regulatory, enforcement, or appellate matters involving federal, Tribal, or offshore energy development, they turn to Rosario.

Rosario represents energy companies in regulatory matters and administrative and judicial appeals involving the U.S. Department of the Interior and its bureaus and offices, including the Office of Natural Resources Revenue (ONRR), Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), and Marine Minerals Administration (MMA).

Her practice has a principal focus on federal and Indian royalties, including valuation, reporting, payment, compliance, governmental audits and enforcement, refund claims, and appeals. Her broader practice encompasses federal and Tribal lease administration, offshore operations, financial assurance and decommissioning, severance-tax matters, and Administrative Procedure Act litigation.

Clients seek Rosario's counsel throughout the regulatory lifecycle. She advises on royalty reporting and payment requirements, valuation, allowances, cost-allocation methodologies, lease and unit obligations, bonding and other financial assurance, decommissioning obligations, and compliance with new rules and agency policies. She also helps clients prepare rulemaking comments, build administrative records, respond to agency information requests, audits, and investigations, and position disputes for negotiated resolution or appeal.

Rosario has represented clients in matters arising under the Federal Oil and Gas Royalty Management Act, Royalty Simplification and Fairness Act, Mineral Leasing Act, Indian Mineral Leasing Act, Outer Continental Shelf Lands Act, Coastal Zone Management Act, False Claims Act, and Administrative Procedure Act, together with their implementing regulations.

Rosario regularly handles appeals before the ONRR Director, BIA Director, and Interior Board of Land Appeals (IBLA), as well as litigation in federal district and appellate courts. She has obtained precedent-setting decisions vacating Interior Department actions, limiting agencies' ability to expand claims during administrative review, clarifying statutory deadlines, and requiring compliance with Generally Accepted Government Auditing Standards (GAGAS). She has also negotiated favorable resolutions with federal, state, and Tribal authorities, including the Navajo Nation and Kiowa Tribe.

Rosario combines computational fluency, meticulous factual development,

and creative legal analysis to translate technical accounting and operational issues into focused arguments for regulators, administrative tribunals, and courts. Over the course of her career, Rosario's work has included saving producers and estimated $25 billion in costs.

Before joining Holland & Hart, Rosario was a partner at Ryan Law Firm, where she led the firm's oil and gas royalty practice. She also practiced as an associate at Baker & Hostetler and Norton Rose Fulbright.

CLIENT RESULTS

Office of Natural Resources Revenue (ONRR)

- Advises federal and Indian lessees on royalty reporting, valuation, allowances, self-audits, and ONRR compliance.
- Routinely resolves data mining reviews, compliance reviews, audits, and enforcement inquiries concerning federal and Indian oil and gas sales, volumes, valuation, and allowances.
- Obtained rare closure, without civil penalties, of ONRR enforcement cases alleging offshore operator knowingly or willfully submitted inaccurate royalty reports or maintained inaccurate records.
- Obtained rare ONRR withdrawal of an Order to Report and Pay alleging improper transportation and processing allowances.
- Secured an uncommon settlement of an appeal from an ONRR Order to Perform Restructured Accounting and Pay, requiring no additional reporting or submissions and releasing all open federal and Indian royalty claims and obligations for a dissolving operator.
- Counseled operators on federal royalty valuation and allowances in data-center and Bitcoin-mining arrangements.

Office of Inspector General (OIG) & Department of Justice (DOJ)

- Successfully resolved and settled various False Claims Act investigations conducted by DOJ, including matters alleging underpaid federal royalties and overclaimed allowances.
- Successfully resolved and settled various investigations conducted by the Department of the Interior's OIG, including matters alleging unreported sales and transportation.
- Counseled New Mexico operator in connection with an asset acquisition on potential liability arising from unresolved federal royalty audits, civil penalty matters, and a False Claims Act investigation conducted by DOJ.

Interior Board of Land Appeals (IBLA)

- Obtained rare IBLA full vacatur, without remand, of ONRR Order to Perform Restructured Accounting and Pay demanding more than $20 million in federal offshore royalties and challenging transportation allowances. 200 IBLA 66 (2025).
- Obtained several IBLA opinions finding evidence ONRR may have acted in bad faith in its decision-making and record compilation

when denying royalty refund claims. IBLA-2020-398, IBLA-2021-176, IBLA-2022-69 (2023).

- Obtained an IBLA opinion prompting codification of the rule that filing an appeal divests the issuing bureau or office of jurisdiction to modify, rescind, or supersede its decision. 90 Fed. Reg. 2332, 2364 (Jan. 10, 2025) (citing 196 IBLA 250, 253 (2021)).

Federal Courts

- Successfully appealed and vacated an ONRR Director Decision denying offshore transportation allowances. Obtained a district court decision vacating modified royalty demands as arbitrary and capricious and remanding for further consideration of ONRR's non-compliance with Generally Accepted Government Auditing Standards.
- In a case of first impression, successfully appealed and vacated an ONRR Director Decision denying transportation allowances. Obtained a district court decision vacating the unlawful expansion and modification of claims asserted in an Order to Report and Pay. 421 F. Supp. 3d 1213 (D. Wyo. 2019).
- Successfully appealed and set aside an ONRR Director Decision valuing unprocessed gas using higher residue gas pricing. Obtained a district court decision holding the valuation of unprocessed gas sold at the wellhead under percentage-of-proceed contracts as processed gas was arbitrary, capricious, plainly erroneous, and inconsistent with the governing regulation. 410 F. Supp. 3d 30 (D.D.C. 2019).
- In a case of first impression, successfully appealed a district court decision dismissing a federal royalty suit as time-barred. Obtained reversal clarifying the application of the 180-day and 33-month periods for judicial review under 30 U.S.C. § 1724. 846 F.3d 1232 (D.C. Cir. 2017).

Bureau of Indian Affairs (BIA) & Tribal Authorities

- Advises Indian lessees on lease administration, bonding and surety requirements, letters of credit, assignments, royalty payment, and related compliance matters.
- Successfully resolved and settled numerous obligations involving Indian leases and Kiowa Tribe severance taxes in a corporate dissolution context.
- Successfully resolved Navajo Nation severance-tax audit with no penalties assessed.

Marine Minerals Administration (MMA)

- Advises Outer Continental Shelf operators on lease administration and assignments, decommissioning obligations, financial assurance, and escrow and other credit-support arrangements in matters involving BOEM and BSEE.
- Obtained rare Treasury waiver and referral of federal royalty debt back to ONRR, resulting in immediate savings of more than

$635,000, and secured BOEM approval of related offshore lease assignments.

Bureau of Land Management (BLM)

- Advises federal lessees on communitization and unit obligations, lease administration, production and revenue allocation, and related regulatory requirements.
- Successfully appealed multiple Incidents of Noncompliance issued by a BLM inspector concerning metering requirements and resolved the appeals without penalties.
- Secured BLM acceptance of a corrected federal royalty allocation factor for the light-oil participating area of a Wyoming unit, effective as of the client's approval as successor operator.
- Counseled a North Dakota operator on revenue obligations under a federal communitization agreement involving unleased federal land.
- Counseled Wyoming operator on allocation methodologies under a unit operating agreement involving a consolidated and expanded participating area and consent and non-consent interests.
- Advised operator on ownership, cost-allocation, and liability issues involving a pre-existing saltwater disposal facility under governing facility and joint operating agreements.

State Agencies, Class Actions, & Private Royalty Matters

- Successfully resolved various audits conducted by the Colorado Department of Revenue, New Mexico Taxation and Revenue Department, and Wyoming Department of Audit, including obtaining rare final audit reports identifying no issues after review of clients' federal gas royalties and unbundling of arm's-length costs.
- Successfully prevented discovery of a non-party natural gas processor's confidential information in multiple class actions.
- Successfully resolved an audit of a national energy producer's private royalty payments and deductions on Denver Basin production.

Department of Commerce / National Oceanic and Atmospheric Administration (NOAA) & California Coastal Commission

- Advised Outer Continental Shelf energy company in federal consistency proceedings before the California Coastal Commission and in appeal to the Secretary of Commerce, administered by NOAA's Office of General Counsel, from Commission objections to consistency certifications under the Coastal Zone Management Act.

Rulemaking & Policy

- Advises clients on proposed federal rulemakings, new regulations, and agency policies affecting onshore, offshore, and Tribal energy development, and helps clients develop comments, administrative records, and implementation strategies.
- Drafted H.R. 10005, "Expedited Appeals Review Act" (Rep. Hageman, 2024), to create a process for expedited review of

certain Department of the Interior appeals.

Pro Bono

- In 2013, obtained the nation's first ruling holding transgender students must be allowed to use restrooms matching their gender identities. Successfully appealed a Colorado school district decision to the Colorado Civil Rights Division under the Colorado Anti-Discrimination Act, working with the Transgender Legal Defense & Education Fund.

PUBLICATIONS

"ONRR Proposes New Rule to Streamline Federal Royalty Valuation," *Oil & Gas Update*, 2026

"Regulatory State Update and Best Practices: Building Credibility, Engaging Effectively, and Managing Reputation in a Volatile Regulatory Environment," *77 CAIL Annual Institute on Energy Law § 13.02*, 2026

"Building the Record Before the Record Exists: Project Records, Case Records, and Why Early Choices Shape the Administrative Record," *Foundation for Natural Resources and Energy Law Special Institute on the Federal Administrative Practice in the Context of Project Development*, 2026

"Significant Industry Victory in Federal Offshore Royalty Dispute," *Oil & Gas Update*, 2025

"Oil & Gas Industry Welcomes New Era of Administrative Law," *Ryan Law Alerts*, 2024

"Contesting the Department of the Interior: Is Deferential Treatment Still Due?," *Foundation for Natural Resources and Energy Law*, 2024

"High-Stakes Royalty Litigation: Class Actions and Federal Royalty Demands," *Rocky Mountain Mineral Law Foundation*, 2018

BLOG POSTS

"Why ONRR's Civil Penalties Won't Rise in 2026," *The Pulse*, July 28, 2026

SPEAKING ENGAGEMENTS

"Regulatory State Update & Best Practices: Building Credibility, Engaging Effectively, and Managing Reputation in a Volatile Regulatory Environment," *Institute for Energy Law 77th Annual Energy Law Conference*, 2026

"The Record Is the Decision: Lessons from Federal Royalty Litigation (and Why They Apply to Permitting)," *Foundation for Natural Resources and Energy Law Special Institute on the Federal Administrative Practice in the Context of Project Development*, 2026

"Recent Trends in Oil and Gas Royalty Appeals and Strategies to

Overcome Judicial Deference," *Foundation for Natural Resources and Energy Law Special Institute of Federal and Indian Oil & Gas Royalty Valuation and Management*, 2024

"Contesting the Department of the Interior through Judicial Deference," *Texas Bar Association 9th Annual Oil & Gas Disputes Course*, 2024

"Implications of ONRR Regulations," *Independent Petroleum Association of America (IPAA) Midyear Meeting*, 2019

"Policy Summit on ONRR Rules: Program Regarding Recent Rulings in Continental Resources, Inc. v. Jewell and State of California v. Department of the Interior," *IPAA Policy Summit*, 2019

"The BLM's Final Rule Governing Rents and Fees for Solar and Wind Energy and the Future of the Renewable Energy Program," *Colorado Bar Association Natural Resources & Energy Law Section*, 2018

"Crude Oil Valuation for Federal Leases," *Rocky Mountain Mineral Law Foundation (RMMLF) – Federal and Indian Oil & Gas Royalty Valuation and Management Conference*, 2018

"Regulatory and Legal Issues Relating to Federal Lands (Onshore and Offshore)," *Houston Bar Association – Oil, Gas, and Mineral Law Section*, 2018

"Marketable Condition – Update on IBLA/Court Cases; Current Issues," *Petroleum Accountants Society of Oklahoma-Tulsa Federal & Indian Royalty Compliance Workshop*, 2017

"ONRR Compliance: Unbundling, Audits, Order, and Increasing Civil Penalties," *Council of Petroleum Accountants Societies (COPAS Education Day)*, 2016

RECOGNITION

- *Best Lawyers: Ones to Watch® in America*, Commercial Litigation, 2024-2027
- *Attorney Intel*, Top 25 Attorneys of Colorado, 2024
- Colorado Super Lawyers® Rising Stars, 2018, 2020, 2021
- *Denver Business Journal*, Top Women in Energy, 2019
- *Denver Business Journal*, Who's Who in Energy, 2018
- *The Business Journals*, Bizwoman Headliner in Law, 2018
- *Denver Business Journal*, 40 Under 40 Honoree, 2017
- American Bar Association, On the Rise – Top 40 Lawyer, 2017
- *Law Week Colorado*, Up and Coming Lawyer, 2016
- *Chambers Diversity & Inclusion Awards: North America*, Future Leader – Gender Diversity Award, 2016

PROFESSIONAL AND CIVIC AFFILIATIONS

- Foundation for Natural Resources and Energy Law, Trustee-at-Large (2025-2026)
- Colorado LGBTQ+ Bar Association, Member