



November 29, 2016

VIA Email (gomggeis@boem.gov)

Dr. Jill Lewandowski
Chief, Division of Environmental Assessment
Office of Environmental Programs
Bureau of Ocean Energy Management
45600 Woodland Road, VAM-OEP
Sterling, VA 20166

Re: Comments on Draft Programmatic Environmental Impact Statement for Geological & Geophysical Activities on Gulf of Mexico Outer Continental Shelf

Dear Dr. Lewandowski:

This letter provides the comments of the International Association of Geophysical Contractors (“IAGC”), the American Petroleum Institute (“API”), the National Ocean Industries Association (“NOIA”), and the Offshore Operators Committee (“OOC”) (collectively, the “Associations”) in response to the Bureau of Ocean Energy Management’s (“BOEM”) request for comments on the Draft Programmatic Environmental Impact Statement (“DPEIS”) to evaluate potential environmental effects of multiple geological and geophysical (“G&G”) activities on the Gulf of Mexico (“GOM”) Outer Continental Shelf (“OCS”). *See* 81 Fed. Reg. 67,380 (Sept. 30, 2016). We appreciate BOEM’s consideration of the comments set forth below.

I. THE ASSOCIATIONS

IAGC is the international trade association representing the industry that provides geophysical services (geophysical data acquisition, processing and interpretation, geophysical information ownership and licensing, and associated services and product providers) to the oil and natural gas industry. IAGC member companies play an integral role in the successful exploration and development of offshore hydrocarbon resources through the acquisition and processing of geophysical data.

API is a national trade association representing over 625 member companies involved in all aspects of the oil and natural gas industry. API’s members include producers, refiners, suppliers, pipeline operators, and marine transporters, as well as service and supply companies that support all segments of the industry. API and its members are dedicated to meeting

environmental requirements, while economically developing and supplying energy resources for consumers.

NOIA is the only national trade association representing all segments of the offshore industry with an interest in the exploration and production of both traditional and renewable energy resources on the United States OCS. NOIA's membership comprises more than 325 companies engaged in a variety of business activities, including production, drilling, engineering, marine and air transport, offshore construction, equipment manufacture and supply, telecommunications, finance and insurance, and renewable energy.

OOC is an organization of 47 producing companies and 61 service providers to the industry who conduct essentially all of the OCS oil and gas exploration and production activities in the GOM. Founded in 1948, the OOC is a technical advocate for the oil and gas industry regarding the regulation of offshore exploration, development, and producing operations in the GOM.

By submitting this letter, the Associations do not intend to limit the ability of their individual member companies to submit separate comments or present their own views on the issues discussed herein.

II. OVERVIEW

The GOM OCS is a significant source of oil and gas for the Nation's energy supply. In 2014, the GOM OCS region was responsible for 16% of the total United States crude oil production and 5% of dry natural gas production.¹ Likewise, GOM OCS leases are an important source of federal revenues, generating substantial bonuses, rentals, and royalties paid to the United States. Since 2008, lessees have paid over \$11 billion in bonus bids for lease sales in the GOM OCS.² Total oil and gas royalty revenues from the GOM OCS amounted to almost \$5 billion in fiscal year 2015 alone.³ Moreover, BOEM has recently estimated the net economic

¹ See U.S. Energy Information Administration, *Gulf of Mexico Fact Sheet* (June 22, 2016), http://www.eia.gov/special/gulf_of_mexico/data.cfm (last visited Nov. 27, 2016).

² See BOEM, *Outer Continental Shelf Lease Sale Statistics, Gulf of Mexico Oil and Gas Lease Offerings* (Dec. 31, 2015), <http://www.boem.gov/Outer-Continental-Shelf-Lease-Sale-Statistics/> (last visited Nov. 27, 2016).

³ See DOI, Office of Natural Resources Revenue, Statistical Information, <http://statistics.onrr.gov/ReportTool.aspx> (Reported Revenues [Single Year Only], FY2015, Accounting Year, Federal Offshore, Offshore Gulf) (last visited Nov. 27, 2016).