

OCEAN CONSERVATION RESEARCH



Science and technology serving the sea

Secretary Ken Salazar
Department of the Interior
Minerals Management Service

April 16, 2009

Re: 2010-2015 Oil and Gas Leasing in the Outer Continental Shelf
Noise pollution impacts of seafloor processing noise

Dear Secretary Salazar,

The US Energy Policy is at a critical juncture, and we truly appreciate your opening up the planning of the next five years of offshore oil and gas leasing to an extended comment period. The results of careful deliberation on this issue will determine if our nation remains at the vanguard of economic and energy development, or if we will collapse around our rapidly outdated assumptions about a petroleum-based economy.

The arguments for and against petroleum extraction on the OCS are well rehearsed: Conservationists do not want a disastrous spill occurring anywhere along our precious coasts. The value of the diverse uses of the coasts and OCS is far too high to risk for the sake of one industry with a limited product life. They don't speak about oil spills in terms of "if," but "when."

The petroleum industry is speaking about the economic value of their industry; about jobs and US oil independence. They are presenting the case that their current operations are less prone to spills and blow-outs due to new technologies that move much of the required processing from the surface platforms and down onto the sea floor.

The equipment used for this processing includes separators, de-sanders, injectors, pressurizers, and multi-stage pumps. This equipment sits on the sea floor around each well head and allows for many wells to be served by either a single ocean platform, or by a land based distribution facility.

While the equipment does decrease the risk of surface spills, it is not without its own set of environmental liabilities. We are concerned about two significant problems. First: due to the operating pressures and physical conditions of the operating environment, this equipment can be very noisy. Ocean noise pollution is rising exponentially and there is increasing evidence that human generated noise is significantly compromising ocean habitat for marine mammals, fish and other marine life.

The second concern is that while the sea floor processing equipment decreases the visual evidence of petroleum operations off our coasts, it conceals the equipment on the sea-bottom. “Out of sight, out of mind” may work for more benign enterprises, but in this case any spills of drilling muds, and the spread of other seafloor processing detritus will occur without public scrutiny and left to be monitored and reported by the system operators alone.

It is imperative that we fully understand and mitigate for these two environmental problems prior to proceeding with approval for opening up the Outer Continental Shelf to additional oil leases.

I will also reiterate the overarching concern I have for the global climate impacts of releasing geo-sequestered carbon through fossil fuel extraction: Continuing to apply federal resources to the development of limited supplies of fossil fuel perpetuates the myth that fossil fuel is still a viable energy alternative. We know that it is not. We have known for 30 years that greenhouse gasses were changing our global climate. We have procrastinated to the point where this change has accelerated into a crisis. This crisis demands that we immediately halt any activities that exacerbate the rapidly decreasing habitability of our planet.

This is not a question of finding the proper pace to taper off so as to not upset the current trajectory of our economy. It is clear from the 30 years of procrastination on this issue that this trajectory – and those who have been driving it – is partially at cause for our being where we are. It is time to take the medicine before the disease becomes incurable.

Stop exploration and development of industrial extraction of OCS fossil fuel.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Stocker". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Stocker
Director