

Congress of the United States

House of Representatives

Washington, DC 20515

February 7, 2012

The Honorable Ken Salazar
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington DC 20240

Dear Secretary Salazar:

On behalf of the undersigned members of Congress, we write to comment on your administration's proposed 2012-2017 Outer Continental Shelf Oil (OCS) and Gas Leasing Program. Our comments focus specifically on three geographic regions: the Atlantic, the Pacific and the Arctic Oceans. While we are pleased to see that no oil and gas development will occur in the Atlantic or Pacific, we urge caution against too quickly moving forward with additional leasing in the Arctic, which this plan in its current form will do.

Less than two years ago, the *Deepwater Horizon* oil rig suffered a catastrophic blowout, killing 11 crew members and setting off the biggest environmental disaster this country has witnessed. This tragedy reminded the U.S. public that offshore drilling is a risky, dangerous business. In the months since the disaster in the Gulf, the Department of the Interior (DOI) has taken steps to decrease the chances of another catastrophic blowout, and we appreciate these efforts. As the Department accepts comments on its new five-year plan for offshore drilling, the memory of this horrific accident must not be forgotten, and the Bureau of Ocean Energy Management (BOEM) and the Bureau of Safety and Environmental Enforcement (BSEE) must move forward with the utmost caution.

First, we are encouraged that BOEM did not include areas off the Pacific Coast for leasing in the draft 2012-2017 program. The agency stated it did not include the Pacific "to accommodate the recommendations of governors of coastal states and of state and local agencies." We support the agency's decision for the Pacific Coast.

We are also encouraged by BOEM's deferral of leasing in the Atlantic in the draft 2012-2017 program. In its justification, the agency cited a "lack of infrastructure to support oil and gas exploration and development, as well as spill preparedness and response." As demonstrated in 2010 with the Deepwater Horizon disaster, sufficient spill preparedness is crucial to a successful offshore drilling operation, so we support the decision to keep the Atlantic lease-free through 2017.

However, we are perplexed that the decision to withhold lease sales from the Atlantic due to a lack of infrastructure and spill preparedness was paired with the decision to hold two

lease sales in the Arctic, a significantly more remote, undeveloped region. During the announcement of the proposed program, you noted the need to “proceed cautiously, safely and based on the best science available.” The current draft fails to do this. The Arctic Ocean is at best a challenging climate for offshore drilling. At worst, the Arctic is a place with harsh weather conditions, sub-zero temperatures and long periods of darkness. The nearest Coast Guard station is more than 1,000 miles away from areas under consideration for leasing. Spill response capacity is simply nonexistent in these remote, icy waters. Just this summer the U.S. Geological Survey (USGS), in its report on the Arctic, stated that because of major gaps in scientific understanding of the region “it is difficult, if not impossible” to make informed decisions about oil and gas development in America’s Arctic Ocean. In addition, the President’s own oil spill commission stated that, “the remoteness and weather of the Arctic frontier create special challenges in the event of an oil spill. Successful oil-spill response methods from the Gulf of Mexico, or anywhere else, cannot simply be transferred to the Arctic.”

The Arctic is a unique environment with significant hurdles that the DOI and related agencies must genuinely address before considering any new leasing in the region in the upcoming five-year plan. Outlined below are a series of strategies that should be in place prior to including Arctic areas in a five-year plan.

- DOI must prioritize protections for important ecological and subsistence use areas based on adequate science that ensures the Arctic Ocean and its wildlife and people are protected.
- DOI must adopt new regulations on spill response and planning standards. There have been no changes in spill response regulations since the Deepwater Horizon disaster and existing regulations are far too weak. Within those regulations there should be specific standards for operating in the Arctic. Such regulations should address issues like location of adequate capping and containment systems, immediate relief well rig capability, seasonal drilling restrictions, and full sensitive area and shoreline response strategies and equipment.
- Consistent with updated regulations, companies and federal agencies like the Coast Guard should be required to develop and have in place adequate spill response plans, methods and equipment to ensure an effective response to a potential spill.
- The USGS report on the Arctic gave over 60 recommendations to make informed leasing decisions. DOI must have a sound scientific plan for managing any future leasing in the Arctic Ocean by implementing these recommendations.
- Equipment to be used for drilling and spill containment and response needs to be tested and proven effective in Arctic conditions.

Including lease sales in the proposed 2012-2017 five year plan before these strategies are in place will put the fragile Arctic ecosystem at significant risk.

To conclude, before any new leasing activity is scheduled for the Arctic, all agencies involved in the planning process must develop adequate science to understand the implications of drilling in the Arctic Ocean, put in place a plan that guarantees protection

of the Arctic Ocean and ecosystem, and guarantee that companies bidding on leases in the Arctic Ocean and applying for permits to drill wells in this unique, intact ecosystem, are fully prepared to handle a disaster like *Deepwater Horizon*.

Sincerely,

Rush Holt
RUSH HOLT
Member of Congress

David Price
DAVID PRICE
Member of Congress

Lois Capps
LOIS CAPPS
Member of Congress

Bob Price

John L. Myners

Dennis J. Kucinich

David B. Bonior

Louise M. Slaughter

Jewell Radler

Biana DeJette

Alcee L. Hastings

Bill Pascrell Jr

Jim Schrock

Steven A. Rothman

Melanie Waters

Joe E. Serrano

Clay E. Cillice

Edward J. Mackey

George Miller

Paul D. Tomko

Jim M. Jones

John Lewis

William R. Keating

Donna F. Edwards

Doris O. Maltbie

Jim Somardi

Frank Pallouf

Pete Stahr

Wm G. Scho

Jodi Sp

Jim Langevin

John H. K.

Steve Cole

Jim McAdams

Keith G. H.

Dorey L. Ackerson Sam Farr

Paul Ellis

John W. Oliver

Loretta Sanchez

Wendy Hilly

John B. Loeffel

Harold A. Wagner

Bobby J. Ross

Barbara Lee

Lynne Woolsey

Miss Gutierrez

Howard L. Berman

Jim Moran

Dan Fisk

Bruce Bialik

Michael W. Hubbard

Beth McEllen

Michael M. Hade

Niki Bangas

Earl Blum

Max K. Heron

Rail M. Hijaba Ernest Quin

Zoe Lipp

Chel R

Billy Batt

Arnold O'Connor

Mary Thompson

Rep. Gary Ackerman
Rep. Howard Berman
Rep. Earl Blumenauer
Rep. Bruce Braley
Rep. Lois Capps
Rep. David Cicilline
Rep. Emanuel Cleaver
Rep. Steven Cohen
Rep. Gerry Connolly
Rep. John Conyers
Rep. Diana DeGette
Rep. Donna Edwards
Rep. Keith Ellison
Rep. Anna Eshoo
Rep. Sam Farr
Rep. Bob Filner
Rep. Barney Frank
Rep. John Garamendi
Rep. Raul Grijalva
Rep. Luis Gutierrez
Rep. Alcee Hastings
Rep. Maurice Hinchey

Rep. Mazie Hirono
Rep. Rush Holt
Rep. Mike Honda
Rep. Jesse Jackson, Jr.
Rep. Bill Keating
Rep. Dale Kildee
Rep. Dennis Kucinich
Rep. Jim Langevin
Rep. Barbara Lee
Rep. John Lewis
Rep. Zoe Lofgren
Rep. Ed Markey
Rep. Doris Matsui
Rep. Betty McCollum
Rep. Jim McDermott
Rep. James McGovern
Rep. Mike Michaud
Rep. Brad Miller
Rep. George Miller
Rep. Jim Moran
Rep. Jerrold Nadler
Rep. John Olver

Rep. Frank Pallone
Rep. Bill Pascrell
Rep. Chellie Pingree
Rep. David Price
Rep. Steven Rothman
Rep. Bobby Rush
Rep. Loretta Sanchez
Rep. Jan Schakowsky
Rep. Adam Schiff
Rep. Bobby Scott
Rep. Jose Serrano
Rep. Louise Slaughter
Rep. Jackie Speier
Rep. Pete Stark
Rep. Mike Thompson
Rep. Paul Tonko
Rep. Niki Tsongas
Rep. Maxine Waters
Rep. Henry Waxman
Rep. Lynn Woolsey