

LLOG S-7666 Supplemental Exploration Plan

Dear BOEM review personnel

I am a marine bioacoustician and director of Ocean Conservation Research (OCR), a scientific research and policy development public benefit organization focused on understanding the impacts of human-generated noise on marine habitat. I have been engaged in this work since 1992, but particularly in the past 14 years as science consultant for conservation NGO's and since 2007 as director of OCR.

I have looked over the LLOG S-7666 supplemental exploration plan and am concerned that the plan is incomplete in terms of environmental impacts. It is clear from the document that acoustical impacts of the proposed plan were completely overlooked. Our specific areas of concern are as follows:

1) The noise generated by the platforms Savan Brasil, which includes 8 x 5000 hp thrusters and the West Auriga and West Neptune, which each employ 6 x 6000hp thrusters for dynamic positioning. So these drilling platforms are stabilized by the equivalent of 8 (or 6) mid-weight cargo ships concentrated in the area of a single drilling rig. In calmer sea states these may not be kicking up that much broad-band noise, but there is a reason that these platforms have all their horsepower – because they need it. Additionally these platforms do not have anchors. This means that as soon as the rig is in service it is driving the props.

These platforms need to be evaluated under all likely drive conditions to make sure that the National Marine Fisheries Service (NMFS) 120dB re:1uPa continuous noise threshold is not exceeded.

2) Noise from acoustically controlled equipment including the Blow-Out Protector. If these acoustical modems are in constant communication between the equipment and the operations control, the frequency, modulation scheme, and amplitudes need to be noted and evaluated for potential impacts on odontocetes per the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA) (page 29 of the document)

3) Noise from acoustical orienting any beacons not mentioned in the plan but otherwise employed in the operation and execution of the plan: the frequency, modulation scheme, and amplitudes need to be noted and evaluated for potential impacts on odontocetes per the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA)

4) Continuous noise from Acoustical Doppler Current Profilers need to be assessed in terms of impacts to odontocetes if they exceed NMFS 120dB re:1uPa continuous noise threshold.

I am also generally concerned about the blanket statement on page 51 under section H "Threatened or Endangered Species, Critical Habitat, and Marine Mammal Information." stating: "Proposed activities in MC 253 and 208 are not located in the presence of federally listed threatened or endangered species and critical habitat designated under the ESA and marine mammal[s] protected under the MMPA."

This statement has the earmarks of a perfunctory "boilerplate" statement (given the typographical error and the placement within the document). In any case the statement is not substantiated by the facts or any by any peer reviewed documents. It is well understood that this area is habitat to a number of ESA listed cetaceans: blue, sei, and finback whales, as well as the listed humpback whale, and the sperm whale. Additionally the area is habitat for other non-listed marine mammals that are nonetheless under regulatory guidelines of the MMPA such as the bottlenose, rough tooth, common, and spotted dolphins, and the ubiquitous *Orcinus orca*.

We would be willing to substantiate these concerns should additional data or citations be required, but given the short public review period we hope that our comments will stand on their own merit.

We appreciate you taking our concerns and comments under consideration and refrain from approving the supplemental exploration plan until these concerns are addressed.

Please feel free to contact us should you have any questions about our comments.

Sincerely,

Michael Stocker
Director

Your Comment Tracking Number: 1jy-8cpy-q557