



# COMMONWEALTH of VIRGINIA

Office of the Governor

Patrick O. Gottschalk  
Secretary of Commerce and Trade

April 7, 2006

Mr. James Bennett, Chief  
Branch of Environmental Assessment  
U.S. Department of the Interior  
Minerals Management Service (MS 4010)  
381 Elden Street, Room 3120  
Herndon, Virginia 20170

Dear Mr. Bennett:

Thank you for the opportunity to comment during the scoping process for the draft environmental impact statement (EIS) for the proposed OCS oil and gas leasing program for 2007-2012. We appreciate your coming to Norfolk for the April 5, 2006, public scoping meeting. We believe the process used to develop the EIS should provide for broad public involvement.

In recognition of the need for energy independence, the Commonwealth supports federal efforts to determine the extent of natural gas resources fifty miles or more off the Atlantic shoreline, including appropriate federal funding for such an investigation. Virginia further supports inclusion of the Atlantic planning areas in the Minerals Management Service's draft environmental impact statement with respect to natural gas exploration fifty miles or more off the Atlantic shoreline. The Commonwealth is not commenting in support of lifting the executive or Congressional moratoria on production and development of natural gas off the Atlantic shoreline at this time.

We recognize the broad scope the Minerals Management Service typically addresses in its draft EIS for its five-year leasing plans. We encourage the MMS to maintain this broad coverage. There are a number of specific areas that the MMS should ensure are addressed in the draft EIS, as they are critical to any determination about the future of the current moratorium. These areas include:

- How protections for the environment and public safety, accounting for the specific conditions in the Atlantic OCS, and addressing both offshore and related onshore operations and facilities, will be assured
- How severe storms, including both tropical storms such as hurricanes and winter storms, will affect offshore Atlantic OCS and related onshore operations and facilities, and how environmental and public safety damage from both offshore and related onshore operations and facilities can be avoided during such storms

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- What best practices, based on the experience in the North Sea, Atlantic Canada, Gulf of Mexico, and other offshore areas, should be required in the Atlantic OCS
- How any effect of offshore activity on military activities, particularly the operating and testing areas of the United States Navy, will be minimized
- How any effects of offshore activity on activities of the National Aeronautics and Space Administration will be minimized
- How the potential for production of gas or oil in the Atlantic to reduce our nation's dependence on foreign sources of energy will be assessed
- How the likely effect of offshore activity on the economy of a state will be assessed
- What role individual states may have in setting enforceable standards for activities off of their shorelines

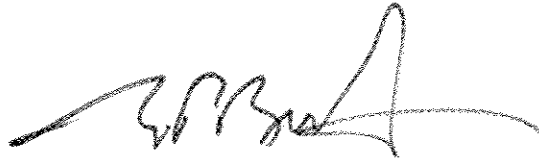
The Minerals Management Service should also revisit its decision to use the equidistant methodology for establishing the state offshore administrative boundaries. The Minerals Management Service should instead establish the administrative boundaries using an equivalency methodology.

Thank you again for the opportunity to comment during this scoping process. Virginia is looking forward to continuing to work with the Minerals Management Service as it completes this draft EIS. Please contact Stephen Walz at the Department of Mines, Minerals and Energy (804-692-3211 or [Stephen.Walz@dmme.virginia.gov](mailto:Stephen.Walz@dmme.virginia.gov)), should you need additional information or have any questions.

Sincerely,



Patrick O. Gottschalk  
Secretary of Commerce and Trade



L. Preston Bryant, Jr.  
Secretary of Natural Resources

cc: Stephen Walz  
Director of Administration, Department of Mines Minerals and Energy