



Randall Luthi  
President

**NATIONAL  
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October 3, 2016

Via Email (BSEEFOIA@bsee.gov)

BSEE FOIA Officer  
Bureau of Safety and Environmental Enforcement  
Mail Stop: VAE-BSEE FOIA  
45600 Woodland Road  
Sterling, VA 20166  
Telephone: 703-787-1689  
Fax: 703-787-1207  
Email: BSEEFOIA@bsee.gov

Re: Freedom of Information Act Request

Dear BSEE FOIA Officer:

The following Freedom of Information Act (“**FOIA**”) Request is directed to the United States Department of the Interior, Bureau of Safety and Environmental Enforcement (“**BSEE**”). It is made pursuant to 5 U.S.C. § 552, and the Department of the Interior’s implementing regulations under 43 C.F.R. Part 2.

Specifically, the National Ocean Industries Association (“**NOIA**”) asks that you please provide the following information:

1. Documents identifying the algorithm and methodology utilized by BSEE to estimate decommissioning costs in the Gulf of Mexico OCS Region (“**GOM**”), including but not limited to those costs involved in any and all of the various tasks necessary to decommission wells, platforms, pipelines, and/or other facilities in both shallow waters and deep waters. If BSEE does not utilize an algorithm, then please provide documents identifying the model or methodology BSEE uses to estimate the costs involved in these tasks.
2. Documents identifying the decommissioning cost assumptions used by BSEE for well abandonment, platform/facility removal, site clearance and verification, and pipeline segment decommissioning.
3. Documents showing the basis for decommissioning cost assumptions identified in response to Request No. 2.
4. Documents (whether internally or externally generated) regarding the development of the algorithm and/or model, including but not limited to:
  - a. BSEE commissioned studies
  - b. Industry publications and academic research
  - c. Operator presentations to bankers/analysts
  - d. Data gathered from operators and relied upon by BSEE in creating its algorithms/methodologies.

5. Documents showing the basis for BSEE's conclusion that if BSEE were responsible for decommissioning liabilities, that the final cost to BSEE would be higher than if decommissioning liability fell to an operator or lessee.
6. Documents generated while developing BSEE's decommissioning estimates that discuss BSEE's decision to use or not to use decommissioning cost information provided to BSEE by operators showing actual decommissioning costs for past projects.
7. To the extent BSEE retained third parties to assist in developing BSEE's decommissioning estimates, documents regarding the process used to select such third parties and the qualifications of such third parties.
8. To the extent BSEE retained third parties to assist in developing BSEE's decommissioning estimates, documents in BSEE's care, custody, or control that were generated by these third parties in developing BSEE's decommissioning estimates.
9. To the extent BSEE retained third parties to assist in developing BSEE's decommissioning estimates, documents identifying the names of such third parties and the fees paid to such third parties for their work in assisting BSEE to develop BSEE's decommissioning estimates.
10. All correspondence, emails, and other communications between any BSEE official or employee and any BOEM or Department of Interior or employee concerning BSEE's decommissioning assessments.
11. All correspondence, emails, and other communications between any BSEE official or employee and any BOEM or Department of Interior official or employee concerning the GAO report number GAO-16-40 published December 18, 2015 and entitled "Actions Needed to Protect Against Billions of Dollars in Federal Exposure to Decommissioning Liabilities."

The date range for this request is January 1, 2014 through the present.

We have attempted to provide sufficient identifying information concerning the documents covered by this FOIA Request. If you determine that any portion of this FOIA Request does not reasonably describe the records sought, please notify us of that determination, so that we may attempt to restate the request in a manner that will rectify any ambiguity or deficiency you believe may exist.

For this FOIA Request, we will be pleased to pay all reasonable reproduction and search fees provided by regulation. We request that you notify us before proceeding, however, if you anticipate that such expenses will exceed \$2,000.00. Please contact the undersigned by telephone or e-mail if you have any questions about the scope of this request. For purposes of fees, we are in the category of "commercial-use requester."

In the event that you determine some of the requested documents may be withheld pursuant to 5 U.S.C. § 522(b), we request that you exercise your discretion to release these documents. Should you elect not to disclose documents determined to be exempt, please delete or redact such allegedly exempt portions of the documents and identify in your response the nature of the deleted or redacted information. Also, in the event that we are denied any document in its entirety or any portion of any requested document, please identify each entire document and each portion of any requested document with particularity and specify the statutory basis for the denial and the sound ground for invoking that basis. This consent to accept documents with deletions or redactions is intended to facilitate your prompt response and in no way waives our entitlement to the complete documents.

In accordance with 43 C.F.R. § 2.16, we look forward to receiving your response within 20 working days. Your response to this FOIA Request should be directed to the undersigned. We would be happy to accept the documents in electronic form (Microsoft Word or Adobe pdf) or in hard copy. Thank you for your prompt attention to this request.

Sincerely,

A handwritten signature in black ink, reading "Randall Luthi". The signature is written in a cursive style with a large, sweeping initial "R".

Randall Luthi

President, NOIA