



September 21, 2018

Mr. Rick Yarde
Regional Supervisor
Office of Environment Pacific Region
Bureau of Ocean Energy Management
760 Paseo Camarillo, Suite 102 (CM102)
Camarillo, CA 93010

Mr. David Fish
Chief Environmental Compliance Division
Bureau of Safety and Environmental Enforcement
45600 Woodland Road
VAE-ECD
Sterling, VA 20166

Via Electronic Submission to <http://pocspermittingpea.evs.anl.gov>

Re: Joint Trade Association Comments on the *Draft PEA for BSEE Permitted Activities in the Southern California Planning Area*

The American Petroleum Institute (API), the National Ocean Industries Association (NOIA) and the Offshore Operators Committee (OOC) (the "Associations") appreciate the opportunity to provide comments on the *Draft PEA for BSEE Permitted Activities in the Southern California Planning Area* (the "EA"). As you are aware, our organizations represent member companies who are significant stakeholders in offshore oil and natural gas production who operate in the Southern California Planning Area.

Support for the Conclusions of the EA

The Associations fully support the conclusion and recommendation of the EA for the Bureau of Safety and Environmental Enforcement ("BSEE") to continue to individually accept, review, and if appropriate approve new permit applications for well drilling, conductor installation, temporary well abandonment, and other permitted downhole activities at 20 oil and gas platforms on the Pacific Outer Continental Shelf. The Associations support BSEE's proposed action – Alternative 1. The continued acceptance, review and approval of these permits will allow for the continued orderly and environmentally sound production of oil and gas from the reservoirs in the 38 leases that have been and continue to be accessed by existing wells and any new wells in the foreseeable future. In addition, this will allow operators to maintain ongoing production, and potentially provide additional access to new reservoirs or better access to, and production from, residual reserves in the existing fields. Lessees and operators will also allow for permitting for the temporary abandonment of wells and other decommissioning activities.

In general, the Associations believe that BSEE adequately presents the purpose and need for the proposed action in the EA, describes the proposed action and reasonable alternatives to the proposed action, and evaluates the reasonably foreseeable environmental impacts of the proposed action and alternatives. The overall conclusions for the impact-producing factors, for all alternatives and cumulative impacts are well supported. We did note one typo on Page 1-4, Section 1.2.1, line 4: the regulatory citation should read “30 CFR Part 250, subpart D”.

If you have any questions, or require clarification, on any of the comments provided here by the joint trades, please contact any one of the following:

- API – Andy Radford, Senior Policy Advisor for Offshore, radforda@api.org
- OOC – Greg Southworth, Associate Director, greg@offshoreoperators.com
- NOIA – Tim Charters, Vice-President, Government and Political Affairs, tcharters@noia.org

Again, we appreciate the opportunity to provide these comments and feedback.

Yours truly,



Greg Southworth
Associate Director
Offshore Operators Committee



Andy Radford
Sr. Policy Advisor – Offshore
American Petroleum Institute



Tim Charters
Vice-President, Government and Political Affairs
National Ocean Industries Association