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July 8, 2013

Mr. Gary D. Goeke  
Chief, Regional Assessment Section  
Office of Environment (MS 5410)  
Bureau of Ocean Energy Management Gulf of Mexico OCS Region  
1201 Elmwood Park Boulevard  
New Orleans, Louisiana 70123-2394

**RE: Comments on Scoping for the Gulf of Mexico G&G PEIS**

Dear Mr. Goeke:

The National Ocean Industries Association (NOIA) is pleased to submit the following comments on the Scoping of the Draft Programmatic Environmental Impact Statement (DPEIS) for Geological and Geophysical (Seismic) studies in the Gulf of Mexico OCS areas.

NOIA is the only national association which advocates solely on behalf of the offshore energy industry. We represent about 300 member companies who are dedicated to the safe development of traditional and renewable offshore energy for the continued growth and security of the United States. NOIA members are engaged in many business activities including oil and natural gas exploration and production, equipment supply, gas transmission, navigation, research and technology, shipping and shipyards, and environmental safeguards. Our membership also includes companies involved in or branching out to pursue offshore renewable and alternative energy opportunities.

Geological and geophysical activities are integral to the development of both traditional and renewable offshore energy sources.

**Offshore energy is a jobs creator and revenue generator**

The oil and natural gas industry has a long history of working with the Department of the Interior to develop this country's natural resources to the benefit of the U.S. economy and all Americans. Our industry stands ready to invest in additional exploration of the Gulf of Mexico. This DPEIS is a needed first step to begin the process of generating the data that will allow for additional production in the Central and Western Gulf and the potential for future discoveries in the Eastern Gulf should that area be made available for leasing and development in the future.

The scope and magnitude of the economic activity in the Gulf of Mexico are huge and largely attributable to energy exploration and development. Currently, the Gulf accounts for over 25% of all U.S. domestic oil production. The Bureau of Ocean Energy Management has determined that over a 40-year period, the leasing, drilling and production resulting from the 2012-2017 5-year OCS Leasing Plan will create an additional 20,025 to 51,825 jobs and between \$1.1 and \$2.2 billion in additional income annually.

**Seismic surveys are the first step toward science based decisions**

To realize these benefits, geological and geophysical surveys – mainly in the form of seismic surveying – will be necessary. Modern offshore oil and natural gas exploration requires the use of seismic surveys to feasibly and accurately prospect for oil and natural gas reserves offshore. This technology has been used for decades to assess the location and size of potential oil and natural gas deposits, which often lay several miles beneath the ocean floor. Seismic surveys also make offshore energy production safer and more efficient by greatly reducing the drilling of “dry holes” where no oil or gas is found to be present. Seismic surveys allow industry and government to make informed, science based decisions regarding our oceans.

**Safety is always our top priority**

The offshore oil and natural gas industry has demonstrated the ability to conduct seismic exploration activities in a manner that protects marine life. The industry employs a number of robust mitigation measures to reduce the negligible risk of harm to marine mammals. Four decades of world-wide seismic surveying activity and scientific research on marine mammals have shown no evidence that sound from seismic activities has resulted in injury to any marine mammal species. Likewise, there is no scientific evidence demonstrating biologically significant adverse impacts on marine mammal populations.

We feel BOEM’s methodology has highly exaggerated the estimated number of incidental takes. There are simply no corroborating observable injuries, mortalities or effects on population to support the conclusions. Industry has repeatedly highlighted flaws in the agency’s methodology -- in acoustic propagation models, use of frequency weighting, and acoustic thresholds -- that result in take estimates that vary by several orders of magnitude. BOEM is simply not using the best available science. As a result, the potential impacts are being overstated.

In the face of no observable injury or mortality data and no population level behavioral effect, the DPEIS should resist the imposition of more and more unreasonable mitigation measures that require operations to be shut down. Adding dolphins to the list of animals that shut down operations would present such an unreasonable measure as dolphins will at times intentionally approach seismic vessels to bow ride in a seemingly normal behavior pattern.

### Summary

Based on the absence of observed effects and supporting scientific knowledge, the alternatives studied in the DPEIS should not consider overly restrictive mitigation measures that will inhibit industry from performing seismic surveys and BOEM from meeting its goals set out in the OCS Lands Act.

Additionally, we feel that the DPEIS must explicitly address the OCS Lands Act's programmatic goal of ensuring the "*expedited exploration and development of the Outer Continental Shelf*," and that the DPEIS fully address and quantify the potential interference with the achievement of that goal posed by any alternative or mitigation measure being considered. For example, if the DPEIS addresses the potential for extending shut down requirements to mammals other than whales and manatees, or expanding the shutdown zone from the current 500 meters, BOEM needs to quantify the number of hours or shutdown that would result, and the implications for the efficacy and timeliness of the seismic survey.

The oil and natural gas industry has a long history of working with DOI to develop this country's natural resources to the benefit of the U.S. economy and all Americans. Once again, seismic surveys allow industry and government to make informed, science based decisions regarding our oceans. NOIA appreciates the opportunity to provide these comments on behalf of our member companies.

Sincerely,



Nicolette Nye  
VP, Communications and External Relations  
National Ocean Industries Association