August 5, 2026

The Honorable Bryan Bedford
Administrator, Federal Aviation Administration
c/o Michelle Ferritto
Office of Rulemaking, Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Subject: Comments of the National Ocean Industries Association and the Offshore Operators Committee in Response to the Notice of Proposed Rulemaking on "Designation-Restrict the Operation of Unmanned Aircraft in Close Proximity to a Fixed Site Facility"

The Honorable Bryan Bedford:

Thank you for the opportunity to provide comments in response to the notice of proposed rulemaking related to restrictions on the operation of unmanned aircraft in close proximity to a fixed site facility. The National Ocean Industries Association (NOIA) and the Offshore Operators Committee (OOC) represent companies developing and producing oil and natural gas on the U.S. outer continental shelf. Section 2209 of the FAA Extension, Safety and Security Act of 2016 (FESSA) directs the Federal Aviation Administration (FAA) to create a system under which operators or proprietors of certain fixed site facilities can request that the FAA to restrict unmanned aircraft operations in close proximity to those facilities. The law is specifically applicable to critical infrastructure, which is defined to specifically include energy production facilities. The FAA should ensure that offshore facilities – some of which produce more than 100,000 barrels per day – are specifically included in the FAA's strategy for protecting critical infrastructure facilities from unmanned aircraft or drone threats, and that such facilities are afforded the appropriate designations for such restrictions. In fact, the FAA should consider a blanket or default restriction that prohibits the use of unmanned aircraft within the vicinity of offshore oil and gas infrastructure, with an exception for unmanned aircraft deployed by the offshore oil and gas sector in the course of operations, monitoring, or security activities, or unmanned aircraft lawfully deployed by federal agencies within the scope and course of their regulatory authorities.

**Background**

For more than 50 years, NOIA has represented the interests of all segments of the offshore energy industry, including offshore oil and gas, ocean minerals, and offshore carbon sequestration. Our membership includes energy project developers, leaseholders, operators, and companies throughout the entire supply chain that make up an innovative ecosystem contributing to the safe and responsible exploration, development, and production of energy and mineral resources.

OOC member companies represent more than 90% of the oil and gas production in the Gulf of America (GOA) OCS with oil and natural gas operators, drilling contractors, and service providers. Its members recognize that offshore operations must be conducted safely and in a manner that protects the environment. The offshore industry has a long history of safe operations that has advanced the energy security of our nation and provided energy resources which are crucial to our nation's economy.

The U.S. offshore oil and gas industry is a central pillar of American energy dominance, supporting hundreds of thousands of jobs, billions in government revenue, and reliable, affordable energy nationwide. With growing reserves and world-class infrastructure, the U.S. offshore region plays a critical role in meeting rising domestic and global energy demand while strengthening America's economy and security.

While we remain optimistic about continued growth in offshore oil and gas production throughout the U.S. outer continental shelf, the Gulf of America is the predominant region for U.S. offshore production. There are more than 1,000 production facilities and thousands of miles of active pipelines in the Gulf of America. The Gulf of America offers a mix of world-class infrastructure, thousands of companies, and hundreds of thousands of workers with incredible experience and expertise, and a strong backdrop of safety regulations, standards, and practices.

In April 2025, the U.S. Department of the Interior announced a significant increase in estimated oil and gas reserves in the Gulf of America, underscoring the region's critical role in advancing our country's national security and American Energy Dominance. The analysis from Bureau of Ocean Energy Management (BOEM) reveals an additional 1.30 billion barrels of oil equivalent since 2021, bringing the total reserve estimate to 7.04 billion barrels of oil equivalent. This includes 5.77 billion barrels of oil and 7.15 trillion cubic feet of natural gas—a 22.6% increase in remaining recoverable reserves.

BOEM's updated assessment evaluated over 140 oil and gas fields, identifying 18 new discoveries and analyzing more than 37,000 reservoirs across 1,336 fields in the Gulf. This comprehensive review added 4.39 billion barrels of oil equivalent in original reserves. After subtracting production of 3.09 billion barrels of oil equivalent since 2020–2021, the net increase reflects continued opportunity and momentum in offshore development.

While almost the entirety of U.S. offshore oil and gas production is isolated to the Western and Central Gulf of America, other countries have eagerly embraced their offshore oil and gas resources. Globally, offshore oil and gas production accounts for nearly 30% of all oil and gas production. In the U.S., about 15% of oil production is from the offshore, and it has been as high as 29%. The U.S. offshore region has been producing more than 1 million barrels of oil per day since 1997 and is currently producing about 2 million barrels of oil per day. U.S. offshore production at levels of 1 to 2 million barrels per day makes a real difference on the world stage.

Production from the U.S. offshore region depends on massive investments, often totaling billions of dollars, that enable oil and natural gas production at tremendous scale. From lease award to first production can take a decade or more. Projects require large, long-term capital commitments. Companies make decisions on multi-year, or even multi-decade, timelines, and they have focused on the Gulf of America, where resource potential is strong, infrastructure is in place, and the policy environment is stable enough to plan around. Recent estimates show that about 18 deepwater facilities in the Gulf of America, occupying the physical space of about 9 city blocks, account for 75 percent of total offshore Gulf oil production. We therefore cannot under-emphasize the strategic importance of offshore oil and gas facilities as critical infrastructure that warrants robust security protections.

**Discussion**

Under the nation's Critical Infrastructure framework, the Energy Sector is one of the 16 designated critical infrastructure sectors. The Energy Sector includes:

- Offshore oil and natural gas production platforms
- Offshore pipelines
- Subsea production systems
- Gathering and transmission infrastructure
- Processing facilities
- Export terminals
- Associated communications and control systems

As discussed in the proposed rule, the Department of Homeland Security defines critical infrastructure as: "[s]ystems and assets, whether physical or virtual, so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters."

It has been determined that offshore oil and gas infrastructure fits this definition because it:

- Produces a substantial share of U.S. domestic oil and natural gas.
- Supplies fuel for military operations, commercial aviation, electric generation, manufacturing, and transportation.
- Supports hundreds of thousands of jobs and significant federal and state revenues.
- Is interconnected with pipelines, refineries, ports, LNG facilities, and offshore export terminals.

Based upon the critical nature and remoteness of offshore oil and gas infrastructure, we urge the FAA to give special consideration to the protection of our industry's facilities and associated infrastructure from the threat of unmanned aircraft. While our industry itself utilizes unmanned aircraft in the course of normal operations, monitoring, and security activities, any unmanned aircraft deployed outside of industry use should be considered for a blanket restriction. In other words, the FAA should consider a blanket or default restriction that prohibits the use of unmanned aircraft within the vicinity of offshore oil and gas infrastructure, with an exception for unmanned aircraft deployed by the offshore oil and gas sector in the course of operations, monitoring, or security activities, or unmanned aircraft lawfully deployed by federal agencies within the scope and course of their regulatory authorities.

**Conclusion**

NOIA, OOC, and their members stand ready to work with the FAA and the Administration in the protection of critical energy infrastructure assets, specifically offshore oil and gas infrastructure. Please contact Erik Milito (milito@noia.org) with any follow-up questions or to set up a meeting.

Very Respectfully,

Erik Milito, President
**National Ocean Industries Association**

Evan Zimmerman, Executive Director
**Offshore Operators Committee**