



April 5th, 2012

Mr. Gary D. Goeke, Chief, Regional Assessment Section
Office of Environment (MS5410)
Bureau of Ocean Energy Management
Gulf of Mexico OCR Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Re: Comments on the Draft PEIS for Atlantic G&G Activities

Dear Mr. Goeke,

Thank you for this opportunity to comment on the Atlantic G&G activities PEIS. The Coastal Conservation League (CCL) is a non-profit environmental advocacy organization representing over 5,000 members in the state of South Carolina. We submit these comments related to our grave concerns regarding the potential impacts oil and gas exploration and development could have on South Carolina's natural environment, tourism industry, and quality of life.

CCL recognizes that the scope of the current PEIS is focused on geological and geophysical activities associated with the siting of renewable projects, marine mineral extraction, and oil and gas exploration, but as evidenced from the previous public hearing process and the current permit applications thus far submitted to BOEM, these geophysical activities are primarily, if not exclusively, focused on oil and gas exploration and are intended to advance the potential for oil and gas development on the Mid and South Atlantic OCS.

It would, therefore, seem appropriate to also consider during this scoping process whether ultimately allowing oil and gas development in these areas would present an unacceptable risk to the environment, tourism industry, and quality of life for Mid and South Atlantic states. If oil and gas development is found to be an inappropriate activity in these areas, then there can be no justification for allowing exploration activities that would inevitably have a variety of negative impacts on various marine species and their respective habitat.

Based on the history of offshore oil and gas development in this country, including the recent BP Deepwater Horizon catastrophe in the Gulf of Mexico and the substantial spills during Hurricanes Rita and Katrina from both offshore and onshore oil and gas infrastructure, and the inability of BOEM to implement regulations that prevent spills, leaks, and other accidents of consequence, CCL recommends that exploration activities



not be allowed on the Mid and South Atlantic OCS, as these activities are simply a means of allowing for future development of oil and gas reserves in these areas. Additionally, these exploration activities will inevitably be disruptive and detrimental to the health of numerous marine species and potentially have population level impacts on the endangered North Atlantic right whale.

As noted by BOEM, the drilling of exploratory wells is considered to be a G&G activity that is covered by this PEIS. The risk of a blowout or oil leak can actually be greater during the exploration stage because less information is available about subsurface conditions (i.e. pressures, geology, and fluid properties). Therefore, if exploration activities are allowed to move forward they should be limited to seismic studies and the drilling of exploratory wells should be prohibited.

Another primary concern of CCL relates to the use of data gathered from exploratory activities. Because the data would be proprietary and only available to BOEM during the pre-leasing process, the States and the public would not have a meaningful opportunity to weigh the costs and benefits associated with offshore oil and gas development on the Mid and South Atlantic OCS.

This leaves the States and the public in the precarious position of opposing or supporting offshore oil and gas development without the updated information and data necessary to evaluate what impacts any recoverable reserves of oil and gas would have on job creation, economic development, revenue generation, foreign oil dependencies, and energy prices.

Additionally, because the BOEM leasing process allows for the development of both oil and gas, the States and the public would not be able to adequately weigh the risks of offshore oil development versus offshore natural gas development, which is arguably more benign due to the lack of potential for spills.

Therefore, as proposed, the PEIS makes it impossible for the States and the public to engage in an open, meaningful dialogue related to the appropriateness of oil and gas exploration and development on the Mid and South Atlantic OCS.

CCL recommends the following actions be considered as alternatives to the current BOEM proposal:

1. A comprehensive, public planning process for the Atlantic OCS should be undertaken as an alternative to the current proposed actions. Because of the increasing pressures on our finite marine resources, it is only appropriate that



BOEM move forward with a planning process that is capable of evaluating all current and future uses of the Atlantic OCS. Establishing a data set capable of guiding public discussion as plans are created for future activities and uses of the Atlantic OCS should be prioritized by BOEM in place of the current proposal to enable oil and gas development without sufficient opportunity for public evaluation of the data gathered during the course of potentially damaging exploratory activities.

2. Prior to allowing exploration activities for oil and gas on the Mid and South Atlantic OCS, BOEM should determine whether oil and gas development is appropriate for these areas in light of the relative sensitivity of these coastal ecosystems, the potential for negative impacts to state tourism and fishing industries, and the inevitable negative impacts on quality of life related to onshore infrastructure necessary to support the industrial activities associated with oil and gas development.
3. If it is decided that exploratory activities will be allowed on the Mid and South Atlantic OCS, then all data should be made available to the States and public as leasing plans are developed by BOEM for offshore oil and gas development. Making the data public would allow for a meaningful dialogue related to the costs and benefits associated with development of estimated oil and gas reserves.

Sincerely,

A handwritten signature in black ink that reads "Hamilton Davis". The signature is written in a cursive, flowing style.

Hamilton Davis
Energy & Climate Director
SC Coastal Conservation League