

AMERICAN ASSOCIATION OF PETROLEUM GEOLOGISTS

An International Geological Organization



Dr. John C. Lorenz
President

June 30, 2010

Mr. J. F. Bennett
Chief, Branch of Environmental Assessment
Bureau of Ocean Energy Management, Regulation, and Enforcement
381 Elden Street, MS 4042
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Re: comments on notice of intent to prepare and scope EIS for OCS 2012-2017 5-year program

Dear Mr. Bennett,

I am writing on behalf of the American Association of Petroleum Geologists (AAPG), the world's largest scientific and professional geological association, in support of developing and scoping an environmental impact statement (EIS) for the Outer Continental Shelf (OCS) 2012-2017 5-year program.

The tragic drill rig explosion and subsequent oil spill in the Gulf of Mexico this year has impressed on everyone the difficult and dangerous task facing the skilled people, including AAPG members, who work offshore in the U.S. and around the world. The industry's offshore safety record is strong. But risks cannot be eliminated entirely when working in offshore environments. Carefully managing risk is the basis of responsible and safe exploration of oil and natural gas on the nation's OCS.

These oil and natural gas resources move people and products, power factories and homes. They fuel the commerce and economic growth to sustain our way of life. The question is not if we need these resources, but rather how to responsibly and safely develop them.

AAPG urges you to begin this process by broadening the scope of the EIS to include the nation's entire OCS, not just the areas announced by the Secretary. It should include the North Atlantic and Pacific OCS. All sections of the OCS have oil and gas potential and none should be excluded from consideration.

The notice of intent published in the Federal Register states that BOE's intent is to "include climate change as an impact factor in cumulative analyses, [and] the effects of the OCS program on climate change" in the EIS evaluation. This emphasis on climate change will divert attention from the necessary review of how to responsibly develop the nation's OCS resources, which should be the primary focus of this process.

Finally, AAPG urges you to reschedule the regional scoping meetings initially proposed, but then canceled as the BOE responded to the Gulf oil spill. It is important to include input from local communities in the development of the EIS and leasing program.

The petroleum resources on the OCS are an essential part of our nation's energy future, and important to our energy security. They belong to the American people and should be developed on their behalf.

Sincerely,

John Lorenz, Ph.D.
AAPG President