

Via email

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**Re: OMB Control Number 1010-0048**

The American Petroleum Institute (API) and the International Association of Geophysical Contractors (IAGC) respectfully submit the following comments on the Bureau of Ocean Energy Management's (BOEM) proposed renewal of an information collection request (ICR) for geological and geophysical (G&G) explorations of the Outer Continental Shelf that was published in the Federal Register on August 31, 2017.

API is a national trade association representing over 625 member companies involved in all aspects of the oil and natural gas industry. API's members include producers, refiners, suppliers, pipeline operators, and marine transporters, as well as service and supply companies that support all segments of the industry. API and its members are dedicated to meeting environmental requirements, while economically developing and supplying energy resources for consumers.

IAGC is an international trade association representing more than 110 member-companies from all segments of the industry that provides geophysical services (geophysical data acquisition, processing and interpretation, geophysical information ownership and licensing, and associated services and product providers) to the oil and natural gas industry. IAGC member companies play an integral role in the successful exploration and development of offshore hydrocarbon resources through the acquisition and processing of geophysical data. For more than 45 years, IAGC has been the global voice of the geophysical industry and is the only trade organization solely dedicated to the industry.

In accordance with the Paperwork Reduction Act (PRA) of 1995, BOEM submitted an information collection request (ICR) to the Office of Management and Budget (OMB) for review and approval under 44 U.S.C. 3507(d). Industry has been able to operate successfully under the existing ICR; however, there are aspects of the current process that may be able to be completed more efficiently. This will become increasingly important in coming years as a new regulatory framework for G&G activities in the Gulf of Mexico is implemented.

For the most part, G&G permits are obtained by the geophysical contractors and in the Gulf of Mexico Region the current process is working reasonably well. However, API and IAGC members have identified areas that may make the permitting process run more efficiently and we offer the following suggestions and comments:

1. Rather than identifying the specific vessel, may the applicant provide information on the type of vessel that will be used to conduct the survey? BOEM can then proceed with its review of the application. The vessel name can be provided at a later date, and assuming it has similar specifications, further analysis by BOEM would not be necessary. On occasion application submissions are delayed until the contractor/vessel is known, and at other times companies must request a modification to the permit as contractors/vessels change.
2. Similarly, may third party notification letters be submitted at a later stage in the process after the application is submitted? At times the application is held up until these letters are completed and distributed.
3. Can BOEM routinely notify all applicants of form updates? Out of date templates have been used in the past, which ultimately causes delay.
4. BOEM has requested comments on whether the information collected was "processed and used in a timely manner". Currently, industry finds the permitting process to be open-ended and uncertain. The Associations recommend that BOEM establish a timeline for permit review and approval, similar to how drilling permits are approved.
5. BOEM acknowledges that an application process for a single permit in Alaska or the Atlantic takes 1000 hours to complete, while the same permit application in the Gulf of Mexico (GoM) may take 300 hours. This is a conservative estimate and the time required may be even greater. BOEM explains that this extraordinary burden is related to NEPA and the associated mitigation requirements. However, such a burden is unjustified, especially considering that surveys are routinely conducted without impact in similar environments worldwide. Rather than simply requesting approval for these unjustified burdens, BOEM should instead assess its permitting process and determine how the burdens will be reduced. Such a reduction would be consistent with the purpose of the PRA. The high permitting costs are entirely inconsistent with the low and effectively managed safety and environmental risks from G&G activities.
6. BOEM also should take steps to reduce the estimated 300-hour burden to apply for G&G permits in the GoM. Thousands of such permits have been issued and the environmental effects have been fully assessed. Mitigating measures have proved effective and should not be changed after a permit is issued. Applying for a GoM permit should be a simple matter of identifying the timing, location, vessel and equipment, and mitigation. Absent special circumstances, the burden could be reduced by 90% without increasing environmental risks.

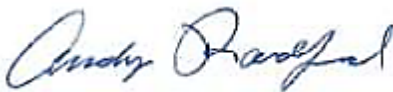
7. We encourage BOEM to explore the creation of an electronic permit application process. Efficiencies for permit processing and man-hours may be realized through electronic permit applications.

Finally, while this ICR addresses BOEM G&G permitting activities, it fails to capture the entire burden needed to conduct G&G activities, which in some cases requires (or may require in the future) authorizations from the National Marine Fisheries Service (NMFS) for incidental take pursuant to the Marine Mammal Protection Act (MMPA) and/or the Endangered Species Act (ESA). For example, for G&G permitting in the Atlantic this is a required part of the process, and the associated burdens should be acknowledged in the ICR. Industry's G&G permitting experience in the Atlantic has shown extreme delays on the part of NMFS. Often applicants are told that a BOEM G&G permit is "ready to be issued" (or has been issued) long before the applicant receives MMPA or ESA authorizations from NMFS upon which the G&G permit is contingent.

In addition, the Associations feel it is important to highlight the need for greater interagency cooperation to improve the G&G permitting process and to ensure that permits are approved in a timely manner. The Associations request that BOEM and NMFS work together to streamline the G&G permitting process and reduce both the information collection needs for what can be considered routine operations and the broader associated burdens. This is consistent with Executive Order 13783, "Promoting Energy Independence and Economic Growth" and the recently signed Secretarial Order, 3358, establishing an Executive Committee for Expedited Permitting.

We appreciate the opportunity to comment on the collection of information contained in this rulemaking and are available for further discussions at your convenience. If you have any questions, please contact me at [radforda@api.org](mailto:radforda@api.org) or at 202.682.8584.

Sincerely,



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