



Via email

24 December 2019

Anna Atkinson
BOEM Information Collection Clearance Officer
Bureau of Ocean Energy Management
45600 Woodland Road
VAM-DIR
Sterling, Virginia 20166

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 October 25, 2019.

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 80 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.

The Associations thank BOEM for their continued efforts to improve efficiency and modifying the permit application process based on previous comments submitted.

Based on the responses received from BOEM, API and IAGC members have clarified certain ambiguities and identified areas that may make the permitting process run more efficiently in the following suggestions and comments:

1. Industry finds the timeliness of the permit process for G&G activities to be open-ended and uncertain. The Associations recommend that BOEM establish a certain timeline for permit review and approval. The timing requirements for drilling permit review and approval is a good example that BOEM should strive to achieve for the G&G industry.

2. 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. Many countries around the world utilize electronic permit application processes. This allows the applicant to monitor the status of the permit process and timely provide any information requests from BOEM. This has been seen to drastically decrease the permit process timeline.
3. G&G operations are consistently utilizing the same vessels throughout the offshore U.S. BOEM should take steps to create a catalogue of vessel information and certificates to reduce permitting costs and burden hours.
4. BOEM should develop a catalogue of equipment used in offshore G&G activities, including Ocean Bottom Nodes, Ocean Bottom Cables, Streamers, etc. This would reduce the time needed to collect pictures and physical samples of all parts and equipment deployed in the water column. Permit applications could then reference these materials to reduce time spent.

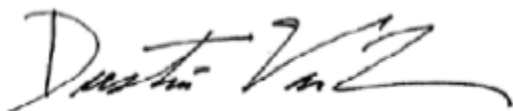
Regarding the addition of requirements for permittees to notify BOEM of any intent to discontinue maintenance of G&G data after 10 years (Forms BOEM-0328/0329); we note that the added provision will impose an additional requirement on permittees and while it is not disagreeable, as the likelihood of suspension of data retainer is slim, the associations caution that disclosure of G&G data extends to 25 and 50 years for processed and field data respectively – in the event BOEM were to retain information following permittee notification under this provision.

Further, we reiterate the need for a streamlined and expected decision timeline for BOEM permits, as detailed above. 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 Dustin Van Liew (dustin.vanliew@IAGC.org, 713.957.8080) or Andy Radford at (radforda@api.org, 202.682.8584).

Sincerely,



Andy Radford
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