

July 6, 2022

The Honorable Jeff Merkley
Chairman Senate Interior Appropriations
125 Hart Senate Office Building
Washington, DC 20510

The Honorable Lisa Murkowski
Ranking Member Senate Interior Appropriations
131 Dirksen Senate Office Building
Washington, DC 20510

Dear Senators Merkley and Murkowski,

We write today to ask for your leadership to improve upon the FY23 U.S. House Interior Appropriations Report language as it relates to our nation's Rigs-to-Reef program. While our organizations are thrilled to see the House Committee's Report indicates strong support for the program, we fear that without further specific instructions by Congress to allow operators the necessary time to enter into the program on a voluntary basis, many offshore platforms and infrastructure currently providing important habitat for marine mammals and fish populations will be unnecessarily lost. Accordingly, we respectfully ask that you improve upon the House's language with the addition of the following underlined section:

Rigs to Reefs.—The Committee strongly supports the Rigs to Reefs program in cooperation with the States and NOAA, both for its conservation value and for its potential to reduce taxpayer decommissioning costs. The Bureau is encouraged to utilize the program to the maximum extent possible and pause any decommissioning orders or civil penalties for entities that declare and demonstrate a desire to participate in the Rigs to Reef program and can exhibit that any such platform: (i) is not a risk to marine navigation or the environment; and (ii) that any oil and gas wells on or adjacent to the offshore infrastructure has been plugged and abandoned or otherwise secured in a safe

manner. The Committee notes ongoing studies by the National Oceanic and Atmospheric Administration and the National Science Foundation that may be useful in informing future program delivery.

Under existing regulations, once an oil or natural gas platform operating on the Outer Continental Shelf (OCS) is no longer producing oil or gas, companies have one year to remove the structure. However, due to the planning required and the coordination with state fish and wildlife agencies, it is extremely difficult to effectuate the required permits and agreements to donate a platform or other structure to the Rigs-to-Reefs program in the one-year time frame. While Interior has the authority to grant additional time to remove offshore platforms and structures, oil and gas companies are often forced to simply comply with the expedited removal in the absence of the time and resources necessary to pursue a potential donation to state reefing programs.

Since the advent of offshore oil and gas production, over 70 years ago, approximately 7,000 platforms have been installed, yet only roughly 1,500 of these structures remain standing today due to the hard work by independent oil and gas companies to remove idled infrastructure. However, these structures have become an essential part of the ecosystem, providing important marine habitat vital to recreational and commercial fishing along the Gulf of Mexico and contributing significantly to the region's economy. From the recreational fishing perspective alone, there are approximately 2.6 million anglers in the Gulf who contribute \$13.5 billion to the annual economy and create more than 100,000 jobs.

The importance of the OCS platforms and supporting infrastructure on enhancing marine ecosystems is well documented. For instance, a March 2020 report funded by the Bureau of Ocean Energy Management and the Bureau of Safety and Environmental Enforcement found that 45% of the estimated greater amberjack stock in the Gulf is associated with OCS platforms and infrastructure. In addition, the report stated that "Platform removals are likely having, and will likely have, significant adverse impacts on local fisheries, especially those offshore Louisiana and Mississippi." This is particularly the case with greater amberjack where the most recent stock assessment indicated the stock is currently in a depleted state.

Oil and gas platforms and offshore assets cost millions of dollars to install, and once they are removed, they will be lost forever. Providing the maximum opportunity to safely repurpose these platforms in the Rigs-to-Reefs program is a critical component of the program's success.



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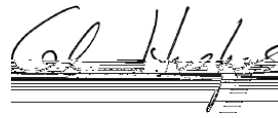
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