



GULF ENERGY
A L L I A N C E



November 22, 2021

The Honorable John Kennedy
United States Senator for Louisiana
416 Russell Senate Office Building
United States Senate
Washington, DC 20210

Dear Senator Kennedy,

Thank you for your continued leadership in the U.S. Senate on issues important to the people of Louisiana, including the offshore oil and gas industry. We write to ask for your support to broaden the ability to utilize the rigs-to-reef program, an issue of great importance to our organizations and the State of Louisiana.

The Louisiana Artificial Reef Program was established in 1986 to take advantage of the important habitat offshore oil and gas platforms in the Gulf of Mexico provide to the commercial and recreational fisheries. This program is a partnership between the Department of Interior, which is charged with regulating and ensuring the decommissioning of offshore platforms and infrastructure, and the State of Louisiana's Department of Wildlife and Fisheries, which administers the reefing program for the State. The Gulf Energy Alliance, the Congressional Sportsmen's Foundation, the Coastal Conservation Association, the Coastal Conservation Association of Louisiana, the American Sportfishing Association, the Center for Sportfishing Policy, BoatU.S., and the National Marine Manufacturers Association's collective mission is to expand the existing rigs-to-reef program and, more broadly, to better understand how existing offshore infrastructure can be utilized to support a lower carbon future by repurposing existing oil and gas platforms to facilitate renewable energy and carbon sequestration projects.

Under existing regulations, once an oil or natural gas platform operating on the Outer Continental Shelf (OCS) is no longer producing, companies have one year to remove the structure. Of the approximately 7,000 platforms that were installed in the Gulf of Mexico since the advent of offshore oil and gas production over 70 years ago, only around 1,650 of these structures remain standing. The science confirms that these structures have become an essential part of the ecosystem as fish and marine habitat

and are essential to supporting recreational and commercial fishing along the Louisiana coast, and contribute significantly to Louisiana's tourism economy.

Taking the platforms out of the water without a proper understanding of how they will disrupt the marine ecosystem should be avoided. There are currently two studies being conducted to analyze the potential impacts of removing offshore structures: (1) a study recently awarded by the National Oceanic and Atmospheric Administration entitled *Measuring the Ecological and Economic Effects of Existing and Reefed Outer Continental Shelf Facilities in the Gulf of Mexico on Recreational Fishing* and (2) a study awarded under a National Science Foundation Grant entitled *Advancing innovative convergence between fisheries and offshore energy to drive adaptive stewardship of fisheries habitat in a dynamic blue economy*. We believe these studies will provide critical information regarding the ecological and economic value of offshore structures to the commercial and recreational fisheries.

Additionally, we are just beginning to understand how the industry can repurpose these offshore structures for various uses that will support the energy transition, including offshore wind, carbon sequestration, methane hydrates, geothermal, aquaculture, and other potential uses. Prematurely removing these structures will impede the ability to shift more quickly and more cost-effectively to a lower carbon future and will forfeit the billions of dollars already invested in this infrastructure.

As such, we seek your assistance to bolster language that was included in the House Interior Appropriations report in support of the rigs-to-reef program and to prohibit the Interior Department from forcibly requiring the removal of offshore infrastructure. We are supportive of that language but think it should be expanded to include an option for companies operating on the OCS to voluntarily opt-out of being forced to remove structures within one year of cessation of production if the operator expresses an interest in either donating the platform to rigs-to-reef program or repurposing it for an alternative energy use. To qualify for a "pause" in decommissioning orders, the oil and gas wells and pipelines associated with these structures must of course be properly and permanently plugged and abandoned to eliminate environmental risk, and companies must also demonstrate that the structures are not a risk to marine navigation.

We believe securing this language is important as we look to understand the potential impacts of removing these structures on the marine ecosystem and the potential to repurpose these structures to be used in the development of alternative energy sources. We appreciate your support of this request and look forward to working with you and your office to secure this language.

Sincerely,



Jeff Crane
President & CEO
Congressional Sportsmen's Foundation



Kevin Bruce
Executive Director
Gulf Energy Alliance



Pat Murray
National President
Coastal Conservation Association



David Cresson
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