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April 20, 2015

Mr. Geoffrey L. Wikel
Acting Chief, Division of Environmental Assessment
Office of Environmental Program
Bureau of Ocean Energy Management (HM 3107)
381 Elden Street
Herndon, VA 20170-4817

Subject: Comments for the 2017-2022 Proposed Oil and Gas Leasing Program

Dear Mr. Wikel:

As representative of the First District of South Carolina, I write to state my position against approving permits for seismic testing in the Atlantic Ocean. After careful consideration, I do not believe that the level of access to seismic testing information for state and local officials in South Carolina is sufficient for them to make informed decisions about the economic ramifications of drilling. This lack of access is compounded by the fact that states will not have the final authority to approve drilling activities off of their coasts, another issue with which I have a long-standing concern. Finally, local input from communities has been strong, with nine towns in the district coming out with formal declarations against the testing.

I believe in energy independence and have been impressed in the way that modern technology has been harnessed in offshore drilling and exploration. For this reason, I had initially been intrigued by the idea of a new round of seismic testing. My feeling was that with these results, South Carolina would be able to do a cost-benefit analysis of whether drilling was worthwhile. I also wanted to look for ways to work with the Administration, given that they had incorporated the thinking of a bill I had that would have moved the territorial control of waters for states from 3 to 12 nautical miles off their coasts, when they proposed setting the oil lease areas at 55 miles off our coast. All this represented a substantive step for me given that I was opposed to drilling off the South Carolina coast when I was previously in Congress and during my time as Governor.

The problem that has arisen as I have studied this issue over the last few months is that states ultimately will not be able to do the cost-benefit analysis that I initially thought was possible. To me it makes no sense to do testing that does not allow states and regions affected to then take that information and determine whether extraction of the oil and gas reserves in question make worthwhile the environmental, tourism, and other risks associated with their transportation.

In the case of South Carolina, weighing the balance between large blocks of untouched coastal estuarine area, and in other parts an established tourism industry, against the potential benefits of drilling is not something that Washington officials are best positioned to do. The infrastructure alone that is needed to service the offshore drilling industry would be a jarring change to many who have come to enjoy the unique look and feel of what we call the Lowcountry of South Carolina.

To be specific, South Carolina would not have full access to the testing data until after the U.S. Bureau of Ocean Energy Management (BOEM) had signed leases with the energy companies. When seismic testing is paid for by the energy companies and only shared with BOEM and not the states, it means that South Carolina would be on the outside looking in. Due diligence by the public and elected officials in the state is not possible if they only have full access to the data once a deal is consummated.

So based on public input I have received, based on the resolutions of nine towns that I represent, based on the industrial nature of shore operations not fitting with current coastal land use patterns, and based on the seismic testing plan currently under discussion not providing enough transparency for South Carolinians to have an in depth conversation about the path forward, I would respectfully ask you not move forward with testing off the coast of South Carolina.

Sincerely,


Mark Sanford