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Comment from BSEE

Posted by the **Bureau of Ocean Energy Management** on Dec 13, 2025

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Comment

These comments are submitted by the current Alaska OCS Regional Director of the Bureau of Safety and Environmental Enforcement.

Comment #1:

Section 18(b) of the OCS Lands Act (43 U.S.C. 1344(b)(4)) requires that “The leasing program shall include estimates of the appropriations and staff required to— […] supervise operations conducted pursuant to each lease in the manner necessary to assure due diligence in the exploration and development of the lease area and compliance with the requirements of applicable law and regulations, and with the terms of the lease.”

The Bureau of Safety and Environmental Enforcement (BSEE) is the Federal authority delegated by the Secretary of the Interior and in some cases agreed to by BOEM under various Memoranda of Understanding and Memoranda of Agreement as responsible for supervising the operations conducted pursuant to each lease in the manner necessary to assure due diligence in the exploration and development of the lease area and compliance with the requirements of applicable law and regulations, and with the terms of the lease.

In response to many years of dwindling industry activity in the Alaska OCS Region and because of recent VERA/VSIP and other workforce attrition, BSEE’s workforce in Alaska is currently below sustainable levels necessary to oversee current lease operations. BSEE’s Alaska OCS Region is currently comprised of a staff of only four personnel to oversee all current OCS lease operations and the ability to meet core mission functions is dependent on other OCS Regions and headquarters programs whose staff are not experienced in regulating either frontier or Arctic lease operations. These four personnel consist of one Program Manager and three Petroleum Engineers. BOEM’s 11th National OCS Oil and Gas Leasing Draft Proposed Program does not address the appropriations or staff required for any amount of additional leasing, exploration, or development activity proposed for the Alaska OCS, as required by 43 U.S.C. 1344(b)(4).

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Considering the additional amount of time needed to properly hire, onboard, and train new subject matter experts with any experience in frontier or Arctic environments, and the loss of many decades worth of experience compounding challenges for recruiting and training any new hires, proceeding with an OCS Leasing Program with any additional activity in the Alaska OCS which does not sufficiently address the appropriations or staff required to supervise operations conducted pursuant to each lease in the manner necessary to assure due diligence in the exploration and development of the lease area and compliance with the requirements of applicable law and regulations, and with the terms of the lease, will further strain BSEE's already limited appropriations and staff resources allocated for the Alaska OCS Region.

Comment #2:

Section 3.3.1 "Beaufort Sea Planning Area" (page 3-8) incorrectly describes there being only "three existing OCS leases in the Beaufort Sea Planning Area." The three OCS leases comprising the Liberty Unit were valid and active as of September 2025, held as such as a result of BSEE's then-pending review of the lessee's request for a Suspension of Production. On November 20, 2025, BSEE issued an order directing the Suspension of Production of the three OCS leases comprising the Liberty Unit with an expiration date of December 26, 2029. When combined with the three actively producing OCS leases from the Northstar Unit, the current count of OCS leases in the Beaufort Sea Planning Area is six.

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