



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL

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OFFICE OF THE
SECRETARY

April 21, 2015

Sally Jewell, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240

RE: BOEM Review of Atlantic OCS Region Geological and Geophysical Permits: E14-001, E14-003, E14-006, and E14-009

Dear Secretary Jewell,

As you are aware the Bureau of Ocean Energy Management has proposed lease blocks within the Mid- and South Atlantic in the upcoming 5-Year Outer Continental Shelf Oil and Gas Leasing Program. A separate but associated action by your cabinet agency currently underway is the review of permits for sub-seafloor seismic exploration. Reliable data on hydrocarbon reserves is necessary to inform leasing decisions. However, the extent of the proposed surveys into waters offshore of Delaware does not correlate to the leasing program areas and we do not see the need for surveys in areas that are not currently subject to leasing.

President Obama's "All of the Above" Energy Strategy calls for responsible domestic oil and gas production, increasing fuel efficiencies, advancing renewable energy technologies and utilizing cleaner energy sources. The State of Delaware is committed to energy efficiency and alternative energy development and seeks to maximize the environmental and economic development benefits of adopting renewable energy. Although this strategy does not include oil and gas production, it still aligns with the national interest, supports Delaware's climate change adaptation and mitigation efforts, and is compatible with our coastal resource-based tourism and economy.

During the initial planning stages for the upcoming 2017-2022 Oil and Gas Leasing Program, the Delaware Department of Natural Resources and Environmental Control requested that offshore areas of Delaware be excluded from potential lease sales. The Bureau of Ocean Energy Management (BOEM) honored that request and no leasing is slated to occur in federal waters offshore of Delaware. However, the proposals currently under BOEM's review for geological and geophysical (G&G) surveys extend beyond the program area and seek to evaluate potential hydrocarbon reserves near Delaware. While it is understood that permits for survey activities can be issued by BOEM independent of actions associated with the 5-Year Plan, data

Delaware's Good Nature depends on you!

Sally Jewell, Secretary

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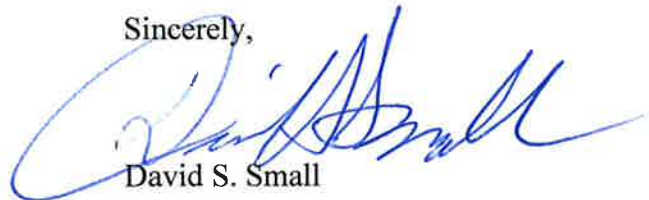
collected from the surveys under review would support energy development that is contradictory to Delaware's stated position. The BOEM should consider states' views on offshore oil and gas production when reviewing these survey permits in the same way that state's views are considered in the 5-Year Program process.

Further, the BOEM analyzed potential impacts to fish, marine mammals, sea turtles, invertebrates and benthic resources in the Programmatic Environmental Impact Statement (PEIS) for G&G Activities and identified mitigation measures to reduce harm to species and habitats. However, by the BOEM's own admission in the PEIS, there is incomplete or unavailable information on species abundance and distribution, and the potential biological and behavioral impact from seismic surveys.

Delawareans rely upon and enjoy our abundant coastal resources. Recreational fishing is especially important to the state. Spending associated with Delaware fishing effort totaled more than \$149 million and supported over 1,300 jobs based on 2011 data. Spending associated with boating for the same time period totaled more than \$950 million and supported over 7,800 jobs. To avoid potential impacts to fish or conflicts with recreational fishing pursuits, I ask that current proposals for seismic surveys in the Mid-Atlantic avoid all areas identified as important to Delaware's recreational and commercial fishing interests. These include offshore areas east and south of Delaware's Atlantic coastline, encompassing designated artificial reef sites, and the Lindenkohl, Spencer, Wilmington and Baltimore Canyons that occur along the edge of the Outer Continental Shelf. These areas were identified using a National Oceanic and Atmospheric Administration (NOAA) Coastal Services Center protocol. A map is included for your reference.

Thank you for your consideration of states' interests in the development of the 5-Year Leasing Program, and your attention to this request regarding the proposed G&G permits in the Atlantic Ocean.

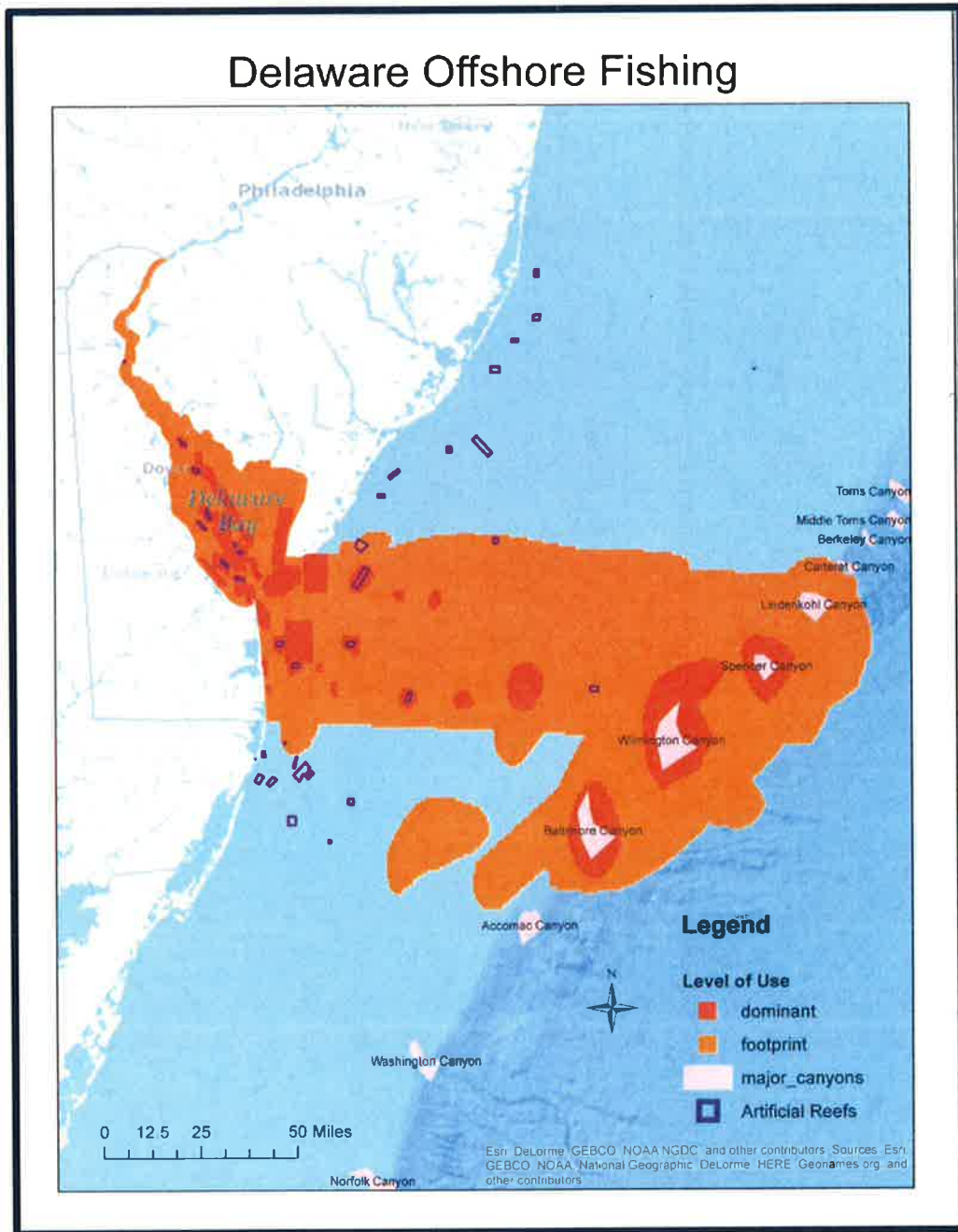
Sincerely,



David S. Small
Secretary

Enclosure

cc: John Blair, Director, Office of Intergovernmental and External Affairs, DOI
Abigail Ross Hopper, Director, BOEM



This map depicts areas identified as important to Delaware’s recreational fishing operations. Areas identified as generally important to offshore fishing are depicted in orange; areas identified as especially important and accessed more frequently are depicted in the darker orange/red. Areas were mapped using NOAA Coastal Services Center protocol.