

***Bureau of Ocean Energy Management,
Regulation and Enforcement
Gulf of Mexico OCS Region
Reef Reviewing Team***



**Artificial Reefs on the
Outer Continental Shelf:
Rigs-to-Reefs Program and
Enhanced Coordination Efforts**

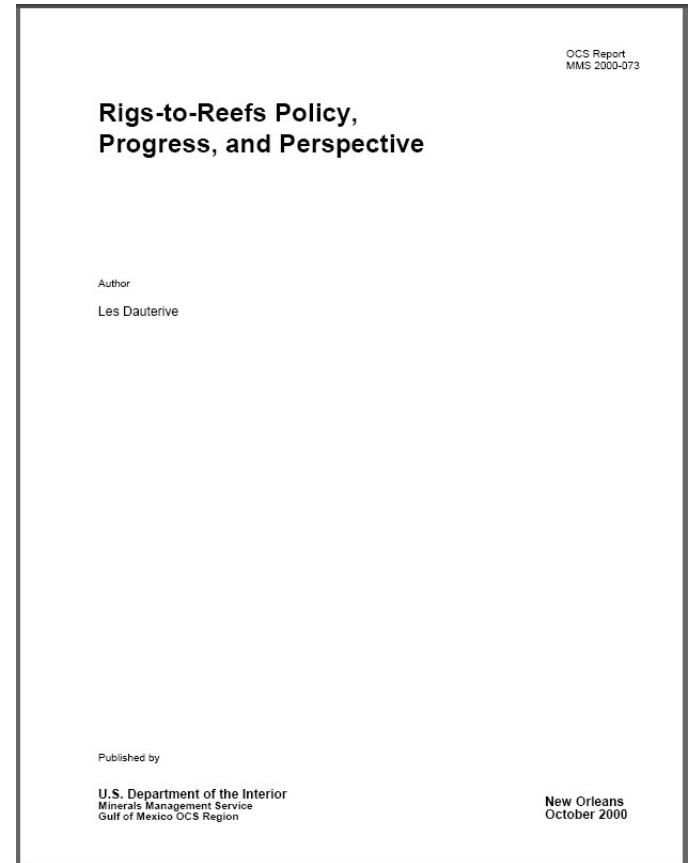




BOEMRE and Artificial Reef Program Support

BOEMRE has been a key figure in artificial reef policy, studies, and cooperation since the early 1980's:

- The role of active OCS platforms in marine ecology and how decommissioned facilities could serve as valuable reefal material has been studied and recognized.
 - the design of most platform jackets allow for effective water circulation;
 - jacket material is long lasting and provides a stable substrate for a host of organisms; and
 - the platform size can support species throughout the water column.
- Support for “*Rigs-to-Reefs*” was first announced in 1983.
- The Rigs-to-Reefs Program was addressed by Congress in the National Fishing Enhancement Act of 1984.
- The Rigs-to-Reefs Policy was formalized in 1985.



***Current Rigs-to-Reefs Policy
Document (MMS 2000-073)***

<http://www.gomr.mms.gov/PDFs/2000/2000-073.pdf>



Recent Rigs-to-Reefs Concerns

Industry's participation in the Rigs-to-Reefs Program remained fairly steady since its inception, but interest has multiplied during the last 5 years due to recent storm damage.



- Over 200 OCS facilities have been toppled to the seabed as a result of Hurricanes Ivan, Charlie, Katrina, Rita, Gustav, and Ike.
- Industry made a huge push towards “abandonment-in-place” reefing proposals based upon claims that
 - diver safety should be the primary factor in reefing;
 - the vast amount of material would provide for varied and good habitat; and
 - The inability to secure removal services/equipment.

BOEMRE's program oversight was required to “evolve” to meet new concerns:

- non-jacket components being proposed as reefal material;
- contaminants in the equipment, vessels, and piping;
- indiscriminant “reef it where it dropped” development;
- conflicts with other users of the OCS – primarily trawlers; and
- Rigs-to-Reefs taking on the appearance of an “ocean-dumping” program.



Recent Rigs-to-Reefs Concerns

After coordinating with other agencies, considering cumulative engineering and environmental analyses, and consulting with dive and decontamination contractors, BOEMRE has chosen to amend its Rigs-to-Reefs Policy to address the major concerns.

- Reaffirms BOEMRE's role and participation in the development of artificial reefs through the Rigs-to-Reefs Program;
- Defines and details BOEMRE's improved reviewing standards incorporated into agency environmental and engineering offices;
- Establishes approval guidelines for platform removal permitting; and
- Encourages renewed coordination efforts between the States, Federal agencies, and the public.

Rigs-to-Reefs Policy Addendum: Enhanced Reviewing and Approval Guidelines in Response to the Post-Hurricane Katrina Regulatory Environment

Related Document

Rigs-to-Reefs Policy, Progress, and Perspective (OCS Report MMS 2000-073)

U.S. Department of the Interior
Minerals Management Service
Gulf of Mexico OCS Region

New Orleans
December 31, 2009

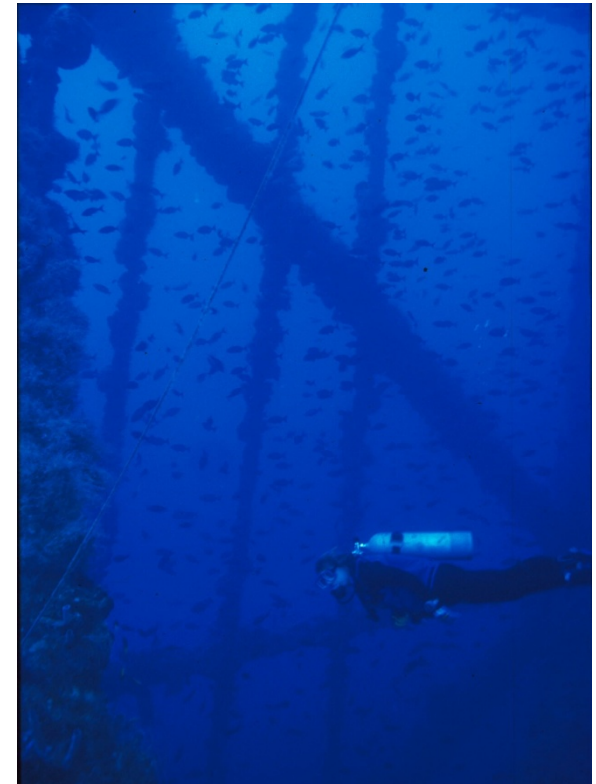
Rigs-to-Reefs Policy Addendum

<http://www.gomr.mms.gov/homepg/regulate/enviro/rigs-to-reefs/Rigs-to-Reefs-Policy-Addendum.pdf>

Rigs-to-Reefs Addendum - Policy

BOEMRE supports and encourages the reuse of obsolete oil and gas facilities as artificial reefs and will grant a lessee/operator a departure from removal requirements under 30 CFR §250.1725(a) and applicable lease obligations provided that

- the structure becomes part of a State artificial reef program that complies with the criteria in the National Artificial Reef Plan;
- the responsible State agency acquires a permit from the U.S. Army Corps of Engineers and accepts title and liability for the reefed structure once removal/reefing operations are concluded;
- the operator satisfies any U.S. Coast Guard navigational requirements for the structure; and
- the reefing proposal complies with GOMR engineering, stability, and environmental reviewing standards and reef-approval guidelines.





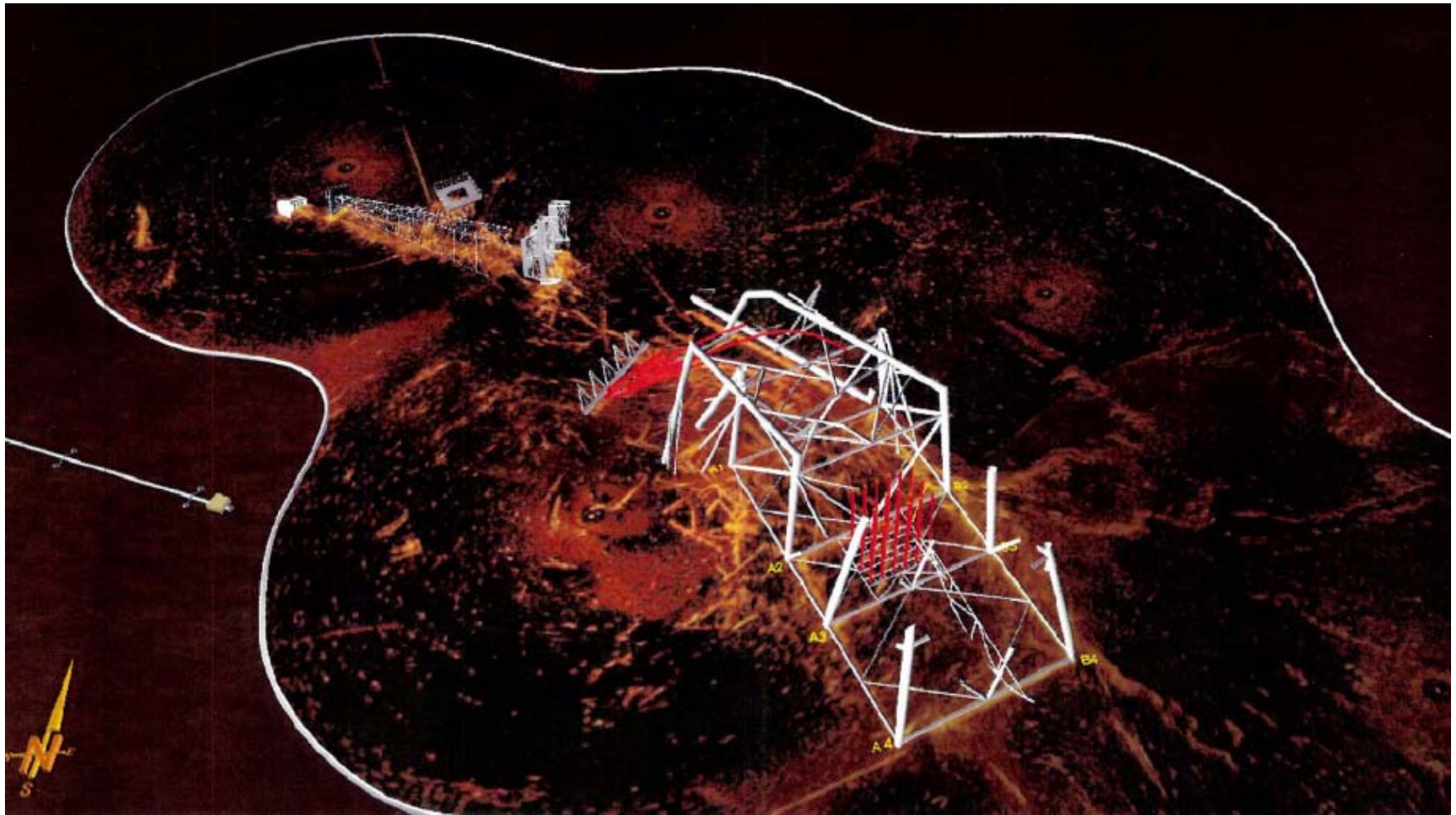
Rigs-to-Reefs Addendum – Reviewing Standards

Engineering, Stability, and Environmental Reviewing Standards: BOEMRE's GOMR will review each decommissioning application proposing Rigs-to-Reef to ensure that problematic engineering and/or environmental uncertainties are eliminated and the BOEMRE Rigs-to-Reefs Policy does not give the impression of a disposal program. The following set of standards will apply:

- **Reef material must be stable and not endanger nearby infrastructure and/or protected resources:**
 - No debris piles, debris fields, or reef baskets will be allowed under OCSLA regulatory permitting;
 - Reef sites will not be permitted in areas of seafloor instability or known mudslide activity;
 - Reef material must be established in the most stable orientation in its final disposition;

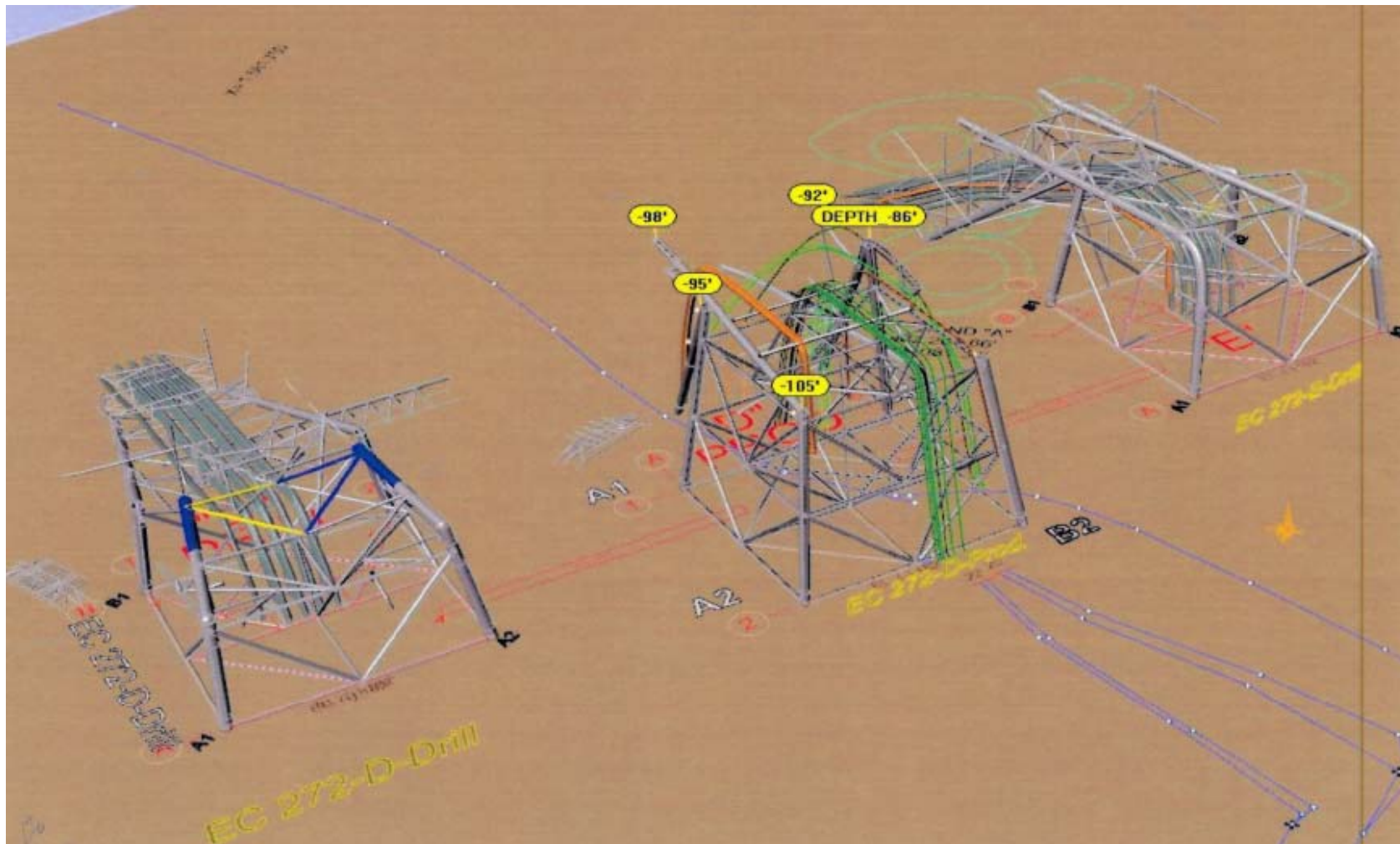


Rigs-to-Reefs Addendum – Reviewing Standards (Continued)





Rigs-to-Reefs Addendum – Reviewing Standards (Continued)





Rigs-to-Reefs Addendum – Reviewing Standards (Continued)

- Reef sites must be free from all potentially hazardous and nonstructural material:
 - **Standing Decks** – all nonstructural components must be removed (i.e., equipment, vessels, piping/tubing, wiring, etc.) and a facility inspection must be conducted/documentated by BOEMRE or a third-party prior to reefing;
 - **Submerged Decks** – all decks and their separated components and equipment must be removed;



U.S. Environmental Protection Agency U.S. Maritime Administration

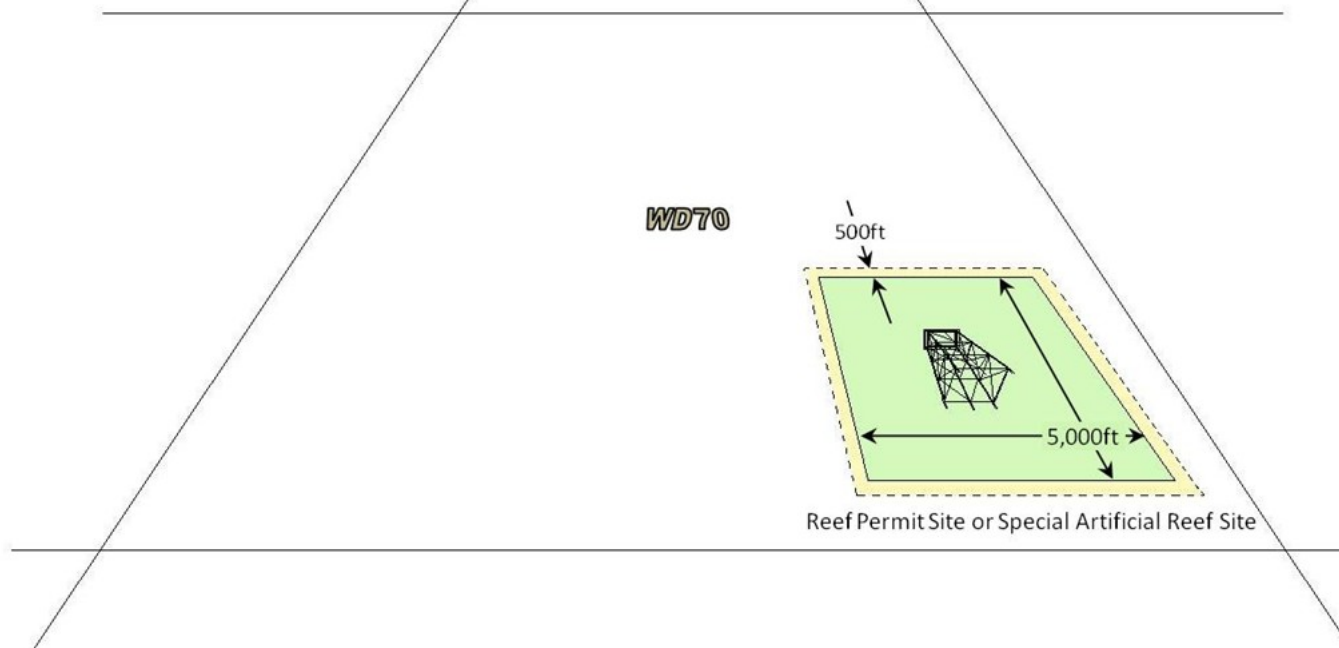
**National Guidance: Best Management Practices for
Preparing Vessels Intended to Create Artificial Reefs**

May 2006



Rigs-to-Reefs Addendum – Reviewing Standards (Continued)

- **Reef sites must not hinder future OCSLA oil and gas, marine mineral, and/or renewable energy/alternative activity operations:**
 - Future reef sites will not be allowed within 5 miles of established/pending reef locations to minimize impact to future pipeline operations;
 - Future reef sites will be reviewed for impact to future resource extraction (e.g., oil, gas, sulphur, and sand resources).



Rigs-to-Reefs Addendum – Reviewing Standards (Continued)

- **Reef sites must not lead to avoidable space-use conflicts with other users of the GOM OCS:**
 - Some proposals may require public review/commenting periods under NEPA (primarily a concern for abandonment-in-place); and
 - Reef sites that fall within the administrative/Coastal Zone Management Act boundary of another state could require coordination/consistency review by both applicable agencies.





Rigs-to-Reefs Addendum – Reef Approval Guidelines

Pending additional policy coordination between necessary State and Federal agencies and the opportunity for public participation, BOEMRE's GOMR will only grant Rigs-to-Reef departures for platform-removal applications proposing the structure's siting within any

- new reef sites within the existing Texas General Reef Permit Area, Louisiana Artificial Reef Planning Areas, or Mississippi Artificial Reef Development Zone 4;
- existing/established artificial reef sites (i.e., previously reviewed and approved by BOEMRE's GOMR) both within and outside of the areas previously mentioned; and
- platform-removal permit applications with Rigs-to-Reef proposals received prior to implementation will be exempt from the Reef-Approval Guidelines; however, they will be subject to the applicable engineering, stability, and environmental reviewing standards noted above.



Rigs-to-Reefs Addendum – Ultimate Goal

The primary goal of our addendum is to increase coordination between all of the Reef Program participants, industry, States, Federal agencies, and the public.

- **Assist in coordinating workshops and public meetings;**
- **Work on Addendum revisions when changes warrant; and**
- **Ultimately, will incorporate the improvements into a new policy document.**

Opportunities for Improving Coordination on Other Reefing Issues

- **BOEMRE would appreciate the opportunity to participate in other reefing efforts on the OCS:**
 - reviewing/commenting on other reef proposals under Rivers and Harbors Act permitting as an “other user of the OCS;”
 - chance to offer assistance with engineering and environmental issues when needed;
 - possible participation in public hearings/meetings;
 - other...



Questions...



Comments...



Conclusion

We want to thank you for your time and we look forward to working with you in the future.

Please contact the following individuals for additional information related to

- **BOEMRE's Rigs-to-Reefs Policy and State Agency Coordination**
 - **Daniel "Herb" Leedy** at 504-736-2776 or daniel.leedy@boemre.gov
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- **Platform-Removal Permitting and Engineering/Stability Issues**
 - **Ramona Sanders** at 504-736-2504 or ramona.sanders@boemre.gov

- **NEPA Analyses and Environmental Issues**
 - **TJ Broussard** at 504-736-3245 or tommy.broussard@boemre.gov