

# Bureau of Ocean Energy Management, Regulation and Enforcement

- Dave Cooke – Regional Supervisor of Resource Evaluation (RE)
- Mike Celata – Deputy Regional Supervisor of RE
- Matt Wilson – Resource Studies Section Chief, RE
- John Johnson – Supervisor Data Acquisition and Special Projects Unit (DASPU), RE
- Rebecca Murphey – Permit Specialist, DASPU, RE
- Dominic Smith – Permit Specialist, DASPU, RE

# Agenda

(As Submitted By IAGC)

- **G&G Permitting**

- Overview of the process

- Documents to be submitted along with permit application
- What are the processing steps of a G&G permit application and insight in regards to the following:
  - What does Resource Evaluation do when they first receive the permit?
  - When does the Environmental section receive the permit application?
  - Does a G&G permit go into a large queue with other BOEMRE permit applications – e.g. drilling permits, development plans, platform abandonment, pipeline easements, etc? How does the Environmental section prioritize the permits?
  - When does the G&G permit application go to coastal states for CZM review? Does it have the EA attached to it? Does the state have a requirement to respond within a certain time limit? What is the average time for CZM review?
  - Once Resource Evaluation receives the G&G permit application and EA back from the Environmental section, what additional steps must RE perform?
  - What is the expected average time for a G&G permit application to be reviewed and approved? What could be the exceptions – i.e. what could require BOEMRE to take additional time before approving a permit?
  - Explain the importance of status reports and final report and what – if anything – is routinely missed/overlooked by permittee and could expose them to an incident of non-compliance.
- What priority does BOEMRE Resource Evaluation use in processing permits? IAGC members want to explain the difficulties /hardships when no priority status is used.

# Agenda (Cont):

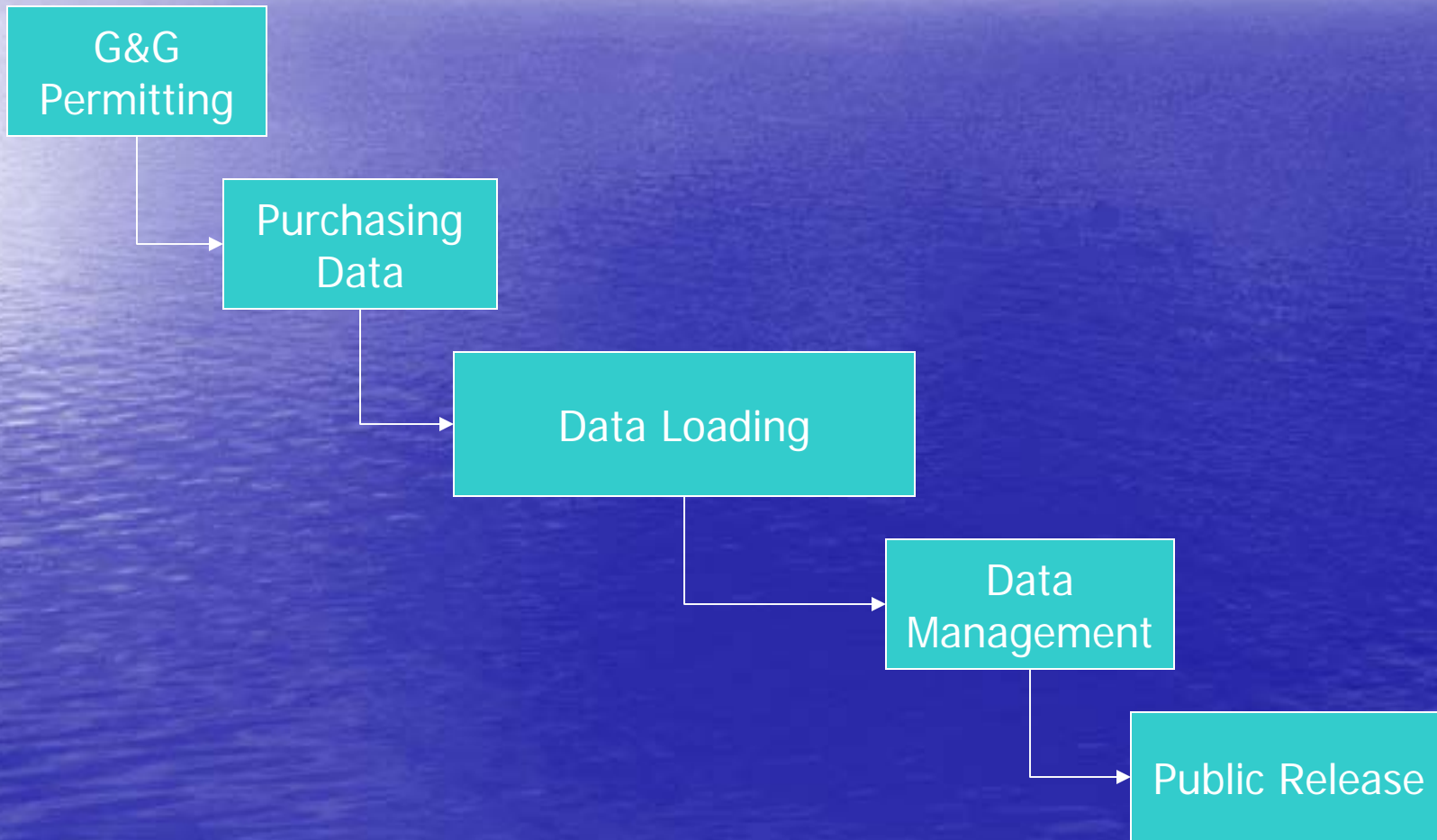
- **Posting of G&G Permits on BOEMRE Website**
- Why is this necessary?
- What has BOEMRE been posting so far – i.e. level of detail?
- Why is what BOEMRE been posting so far seem inconsistent – not all permits posted have the same information (e.g. some do not have plats and others do)?
- Ultimately, what does BOEMRE want to post? When are they obligated to post? When do they want to post? If different, explain.
- IAGC members want to explain the concerns they have in posting G&G permits and explore and discuss options with BOEMRE

# Geological and Geophysical (G&G) Permitting

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# G&G Data: A Life Cycle Approach



# G&G Permitting

## Permitted Activities: Geophysical Surveys

- 2D and 3D Seismic
- Controlled Source Electromagnetic or CSEM
- Gravity and Magnetics
- High Resolution Seismic
- Aeromagnetic Surveys

# G&G Permitting

## Permitted Activities: Geological Surveys

- Coring
- Geochemical
- Shallow Test Drilling
- Deep Stratigraphic Test Wells

# G&G Permitting

- When E&P companies or contractors apply to BOEMRE for a G&G permit they should submit:
  - One signed original and 3 copies of permit application
  - One signed original and 3 copies of the permit
  - Map indicating where the proposed activity will be
  - Copy of Pay.gov receipt
- You may submit additional documentation to better describe or explain your proposed activity.
  - Schedule of the proposed activity

# G&G Permitting

- If the proposed activity will occur offshore Florida requires Coastal Zone Management Act (CZMA) approval:
  - The permittee submits a copy of the permit application to Florida Department of Environmental Protection for CZMA approval.
  - When Florida completes their review they will submit a letter to BOEMRE (RE & LE) stating that the activity either does or does not have CZMA approval.
  - FL can usually provide BOEMRE with a CZMA consistency letter in about 30 days assuming no problems. FL has up to 6 months to respond.
  - FL does not receive a copy of the BOEMRE Environmental Analysis (EA).

# G&G Permitting

- Permit Processor acts like a coordinator for permit approval process:
  - Inspects documents to ensure they are complete and the information is correct
  - If necessary, follows up with permittee to correct any deficiencies in documentation
  - When complete, the applications are accepted and signed by the Regional Supervisor of Resource Evaluation.

# G&G Permitting

- Permit Processor acts like a coordinator for permit approval process (Cont):
  - The Public Information copy of the Application and a copy of an activity map are published on the BOEMRE web site:  
<https://www.gomr.mms.gov/WebStore/pimaster.asp?appid=5>
  - A copy of the application is sent to the Environmental Compliance Section (LE).

# G&G Permitting

- When LE receives a copy of the permit application from DASPU, the application goes into the EA queue. This queue includes all other BOEMRE activities that require EAs.
- Priority considerations:
  - Number of other activities requiring EAs in the pipeline
  - Some activities have regulatory time requirements, some do not (including G&G activities).
  - DASPU priority assignments
- Upon completion of the EA, a FONSI memo is written. The FONSI is a Finding Of No Significant Impact if the included mitigations are followed.
- Upon receipt of a CZM letter from FL (if necessary) the FONSI is forwarded to the permit processor with any mitigations unique to the individual permit application.

# G&G Permitting

- Upon receiving the FONSI from LE, the processor adds it and a copy of the FL CZM letter to the permit packets.
- A draft cover letter, containing the FONSI mitigations is typed and the standard stipulations (yellow sheets) are added to the packets.
- The processor reviews each packet for completeness and delivers them to the DASPU supervisor.
- The 4 packets are reviewed for completeness and then provided to the Regional Supervisor of Resource Evaluation for signature.
- After signature, the original permit and application are retained by RE, the permittee and service company each receive a copy and the public information copy is routed to Public Information to be put on the BOEMRE web site.

# G&G Permitting

- Time considerations for DASPU application processing:
  - DASPU attempts to process each application within 10 DASPU working days
  - Common processing holdups:
    - Incomplete application
      - Inadequate description of proposed activity
      - Vessels to be used
      - Maps (scale, insufficient information)
      - No pay. gov receipt
      - Not enough copies

# G&G Permitting

- The Regional Supervisor's signature date is the permit's start date and begins the 60 day clock.
- Permit Extensions (60 days; up to 5 extensions)
- Vessel Changes
- Permit Additions (usually require an additional environmental review; basically act like a mini permit application)
- Completion of permitted activity and submission of a Final Report 30 days after completion of operations

# G&G Permitting

- Status Reports
  - Monitor progress of acquisition, particularly if the permittee is asking for a permit extension
- Final Reports
  - Informs BOEMRE that the permitted activity has been completed
  - Description of work actually performed
  - The navigation data provides a check to ensure the data were collected where permitted.
  - Brief description of any major events of interest that occurred (HC occurrences observed, adverse effects on other activities or marine life in the course of acquisition)
  - In Short: Permits BOEMRE to confirm the activity carried out matches the activity proposed and notes any significant environmental, safety or archaeological events that occurred

# G&G Permitting

- Most common INC issues:
  - Late Final Reports; 99% of INCs
    - Due 30 days after completion of operations

# G&G Permitting

- Prioritizing G&G Applications:
  - Considerations:
    - When the application was submitted
    - Whether the permittee already has active permits; are they acquiring data with their active permits or waiting on vessels?
    - Permittee's status
      - Do they have a vessel on standby?
      - Vessels ready to go in 30 days vs no idea?
    - Permittees with multiple pending applications may prioritize their own permits.

# G&G Permits On The BOEMRE Web Site

- Current BOEMRE Policy

- When an application has been accepted (*application* is considered complete & signed) it is put on the public web site (<https://www.gomr.mms.gov/WebStore/pimaster.asp?appid=5>)
- A map of the activity location is included
  - 3D – the blocks to be permitted are indicated; blocks may or may not include numbers
  - Nodal Surveys – blocks included in surveys are shown but not node locations
  - 2D – a polygon or the generalized lines may be present on the map
  - Hi-res – a polygon over the area to be surveyed is used

# G&G Permits On The BOEMRE Web Site

- Current BOEMRE Policy (Cont)
  - When the permit is signed by the Regional Supervisor the permit is put on the web site.

# G&G Permits On The BOEMRE Web Site

- Inconsistency?
  - Current policy came about in three parts:
    - 1) Originally just the application and permit (minus Section D & map) were published after the permit was signed.
    - 2) BOEMRE was required to publish the application as soon as possible; resulted in being published after application acceptance (signed by Regional Supervisor of Resource Evaluation)
    - 3) BOEMRE was required to include a map showing the activity location; map added with previously stated exclusions

# G&G Permits On The BOEMRE Web Site

- Why?
  - Transparency
    - Increased pressure to provide more transparency related to all BOEMRE activities including G&G permitting and the EA process and products
    - Increased scrutiny of G&G activity levels and locations