



RE: Save the Blue Initiative
Protecting and Preserving Ecosystems in the Gulf of Mexico

Dear Colleagues and Interested Parties:

As a diver, fisherman and independent energy producer I have a unique perspective of many facets of our extraordinary Gulf of Mexico. Witnessing first-hand a wonderful ecosystem of vibrant, thriving, living organisms has brought me to the question relating to platforms decommissioning: ***“Should we really destroy these wonderful ecosystems because of a regulation that was enacted before anyone could conceive of the amazing life that would develop on and around the oil and gas platform structures?”*** Beyond observation, scientific research has revealed that numerous endangered and protected species of corals and marine life are catastrophically destroyed in the decommissioning of offshore platform structures. The Rigs-to-Reef Act was a step in the right direction and certainly acknowledged the value of ecosystems associated with the subject structures. However, it stops short requiring platforms to be cut to 85 feet below the surface, while scientific study reveals that the bulk of the valuable ecosystems exist from the mandated removal depth. Therefore reefing practices today in the Gulf of Mexico are destructive to marine life and remain in conflict with prevailing laws. Ultimately, the structures with ecosystems should be maintained throughout the entire water column. There is also a moral issue associated with destroying the splendor of these valuable ecosystems. We are actively working with members of the Senate and the House on this initiative to ensure these valuable ecosystems are protected and preserved on a go-forward basis. I ask that you join the effort to ensure the future of the Gulf of Mexico is protected. The Gulf of Mexico is one of the few places on earth where the health of the environment is so obviously linked to the health of the economy and community.



PROPOSAL: The proposal simply calls for an ecosystem study to be performed near the end of a platform’s useful life. Should a thriving ecosystem be determined to exist, then it is proposed that each well and pipeline abandonment be conducted as dictated in the regulations but allow the structure to remain in place to protect and preserve the life that has formed on the structure. Hurricane risk could be mitigated by removal of decks, eliminating wave-in-deck failure potential. Navigation aids would be removed from the decks and placed on the remaining legs above the water level at a sufficient height to protect mariners. Anodes would be maintained to ensure the structural steel is protected. With proper care and protection, these platforms can maintain their integrity. Owners of the platforms would donate the structure and monetary liability funds into a trust fund to maintain and preserve the ecosystems for future generations of fishing, diving, and research. The trust fund would maintain insurance on the structures should any unforeseen catastrophic damage occur to the structures.



For additional information and research, please visit <http://www.blackelkenergy.com/blue/>.
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For tens of thousands of years, the Gulf of Mexico has had precious little hard bottom associated in its shallow sunlit waters. But there is an exception to this: The Flower Garden Banks in the northwestern Gulf, at the edge of the continental shelf where thriving coral reefs have developed. Their significance has been recognized by the US government, and they have been declared the NOAA Flower Garden Banks National Marine Sanctuary.

The Gulf of Mexico has virtually no substrate for corals and habitats to form. In 1947, the oil and gas industry began deploying oil and gas drilling platforms in the Gulf, and changing the marine landscape. These platforms have acted as new settling substrate for corals. The platforms are also covered with other plants and animals associated with Caribbean coral reefs. They are also home to abundant populations of reef-associated fish. The platforms essentially provide 2-3 acres of living and feeding habitat for thousands of underwater species. Without the platforms and other artificial reefs, fish and other marine life would become widely dispersed and geographically isolated, far from ideal conditions for commercial fishing and recreational fishing and sport diving. Unfortunately, the flourishing marine life is in jeopardy as the shallow water structures approach the end of their oil and gas life. Social, moral and economic concerns are also relevant concerns.

The original plan, mandated by Federal environmental regulation back in the late '70s, was to remove the platforms and structures as they ceased production. Most offshore fields in water depths less than 600 feet are projected to become unproductive within the next 10–15 years, requiring that 150–200 platforms be removed annually from this point forward. These removals would be disastrous for marine life in the Gulf negatively impacting fishing and tourism economies tied to the Gulf Coast States.

Awareness, Education and Legislative changes can protect the marine life, protect the economic stability of many communities that rely on fishing and mariculture and preserve the area for research. In Louisiana, saltwater recreational fishing alone is reported to stimulate \$745 million annually in economic output and is associated with 25,590 jobs. The vast majority of recreational trips are to platform ecosystems. In total, an estimated 326,644 jobs are potentially impacted along the Gulf Coast (USDOC, NOAA, 2010c.) The offshore platforms have been the sole reason for the fish and invertebrates' attraction, collection and growth, giving the flat mud, sand bottom an otherwise unremarkable ocean environment. Marine researchers have reported fish densities to be 20 to 50 times higher at oil and gas platforms than in nearby open water.



Entire populations of invertebrates will die immediately and the obligatory reef fish will be lost to the process of mandatory removal. If the current requirements remain in force, every year for the next 20 years, platform / structural removals will virtually eliminate the vast majority of ecosystems in the Gulf. Each year, more fish, coral, and marine life will be lost and disappear from the Gulf forever.

I am sharing this information with those of you directly tied to the Gulf of Mexico with the power and influence to make a difference. I believe a new solution to our late producing life oil and gas structures is in order and that requires multi-industry support, education and outreach to the public. A “not for profit” organization is forming with the sole purpose of executing legal, legislative and education objectives. Together, we can make a difference, protecting marine life in the Gulf for centuries to come. Please join me in protecting and preserving the Gulf today. Together we can *Save the Blue!* I anxiously await your supportive return communication.

Sincerely,

John Hoffman
President/CEO

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