



March 9, 2018

Docket No. BOEM-2017-0074

Bureau of Ocean Energy Management (BOEM), Department of the Interior

RE: 2019-2024 Outer Continental Shelf (OCS) Oil and Gas Leasing Draft Proposed Program

Dear Sir or Madam:

The American Chemistry Council (ACC) appreciates the opportunity to comment on the Bureau of Ocean Energy Management (BOEM) Draft Proposed Outer Continental Shelf (OCS) Oil and Gas Leasing Program (DPP) for 2019-2024. We commend the administration's decision to include new Atlantic, Pacific, and offshore Alaska areas, and we are pleased to see the unprecedented number of lease sales, as compared with past programs. However, we are very troubled by the uncertainty surrounding the availability of leasing in the eastern Gulf of Mexico.

ACC represents the leading companies engaged in the business of chemistry in the United States. Chemistry is one of the largest U.S. manufacturing industries and a key element of the economy. We are the nation's leading exporter, accounting for 14 percent of all U.S. exports. A \$768 billion enterprise, our industry provides 811,000 skilled, high-paying jobs. Key downstream industries include construction, transportation, and agriculture.

The chemistry industry is highly energy-intensive. We use energy inputs, especially natural gas, for fuel and as our main source of feedstock. Plentiful and affordable domestic supplies have led to massive new investment in U.S.-based chemistry and plastics production. Since 2010, 313 projects valued at \$188 billion have been announced. These new facilities, expansions, and factory restarts could create \$95 billion in new chemical industry output and 823,000 permanent new jobs throughout the U.S. economy by 2025. This is a historic time for American chemistry.

We applaud BOEM's proposal of a more robust leasing plan, which will help ensure that public lands continue to serve as major energy suppliers for the United States. For example, the federal government has taken a key step forward by allowing energy development in the Atlantic. BOEM estimates that the proposed Atlantic leasing area could be home to a significant part of an estimated 3 billion barrels of oil and 25.5 trillion cubic feet of natural gas.

We ask that the administration include all areas of Atlantic seaboard in the final Plan, including the mid- and south-Atlantic areas offshore Virginia, North Carolina, South Carolina, and Georgia. We urge timely approval of Atlantic seismic survey permits needed to safely assess offshore resources. And BOEM must complete National Environmental Policy Act (NEPA) analysis on the eastern Gulf of Mexico, in accordance with federal policy, in order to be prepared for the expiration of the statutory moratorium in 2022.

Any sensible national energy policy must include our offshore oil and gas resources. New supplies will help ensure that the U.S. economy and its consumers have access to domestic energy for future generations. A supply strategy that includes OCS energy will support the manufacturing renaissance underway in the United States.

We appreciate the opportunity to comment and look forward to BOEM finalizing a leasing program that includes broad access to U.S. resources in the Atlantic, Arctic, and Gulf of Mexico.

Sincerely,

A handwritten signature in black ink, appearing to read 'Owen A. Kean', with a long horizontal flourish extending to the right.

Owen A. Kean  
Senior Director  
Regulatory & Technical Affairs