



# MARINE MAMMAL COMMISSION

19 July 2011

Ms. Cheryl Blundon  
Regulations and Standards Branch  
Bureau of Ocean Energy Management, Regulation, and Enforcement  
381 Elden Street, MS-4024  
Herndon, VA 20170-4817

RE: Information Collection Request ICR 1010-0151

Dear Ms. Blundon:

The Marine Mammal Commission has reviewed the Bureau of Ocean Energy Management, Regulation, and Enforcement's *Federal Register* notice regarding information collection requirements related to exploration, development, and production operations on the Outer Continental Shelf (76 Fed. Reg. 39419). The Outer Continental Shelf Lands Act authorizes the Department of the Interior, and by extension the Bureau, to prescribe regulations governing oil and gas operations on the Outer Continental Shelf to meet the nation's energy needs as rapidly as possible; to balance orderly energy resource development with the protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on Outer Continental Shelf resources; and to preserve and maintain free enterprise competition.

Regulations pertaining to exploration, development, and production operations are an important means of ensuring that oil and gas activities on the Outer Continental Shelf are conducted in such a manner that minimizes harm to marine mammals and their habitats. To implement these regulations, the Bureau requires that operators submit detailed exploration plans or development and production plans. The Bureau must then analyze and evaluate each plan to ensure the proposed activities are safe; will not adversely affect the marine, coastal, or human environment; and will conserve the resources of the Outer Continental Shelf. The Bureau must also ensure the plans are in compliance with all applicable laws, including the Endangered Species Act and the Marine Mammal Protection Act, and meet other requirements as specified in regulations at 30 CFR Part 250 (Subpart B). Accordingly, the Commission supports the Bureau's request that the Office of Management and Budget approve the collection of information related to exploration, development, and production operations on the Outer Continental Shelf.

Thank you for the opportunity to comment on this matter.

Sincerely,

Timothy, J. Ragen, Ph.D.  
Executive Director