

October 5, 2022

Kelly Hammerle
Chief, National OCS Oil and Gas Leasing Program Development and Coordination Branch
Leasing Division, Office of Strategic Resources
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216

Submitted via: [Regulations.gov](https://www.regulations.gov)

RE: Request for comments on the 2023–2028 National Outer Continental Shelf Oil and Gas Leasing Proposed Program (Docket ID: BOEM–2022–0031)

Dear Ms. Hammerle:

On behalf of Consumer Energy Alliance (CEA), I write to encourage the Bureau of Ocean Energy Management (BOEM) to preserve all lease sales identified in the Proposed Program and not further restrict access to future energy resource development. U.S. offshore oil and gas resources are vital to providing a stable economy for American consumers and ensuring national security.

With more than 550,000 members nationwide, CEA's mission is to help ensure stable prices, advances in environmental performance, national energy security, and energy reliability for households and businesses across the country. CEA's members include families, farmers, small businesses, distributors, producers, organized labor, and manufacturers, all coming together as a broad organization to support America's environmentally sustainable energy future. Since 2006, CEA has worked to encourage people across the nation to seek sensible, realistic, affordable, and environmentally responsible solutions to meet our daily energy needs.

CEA is focused on a realistic energy policy strategy that advances our shared environmental goals while maintaining affordable and reliable energy, and recognizes that we will need all-of-the-above solutions to meet our national and individual energy needs. CEA promotes environmentally sound policies to use all of our natural resources responsibly. This includes all traditional and alternative resources as well as energy-efficient technologies to move our economy and power the lives of our communities and neighbors – many of whom are struggling to make ends meet.

On January 27, 2021, Executive Order 14008 paused new oil and gas leases on public lands and offshore waters. Since then, crude oil prices have risen [more than 63 percent](#) (as of September 19, 2022), while foreign imports of crude oil have increased [almost 5.3 percent](#).

The U.S. has ample domestic resources that can be developed in an environmentally and economically responsible manner to reduce the burden on families, farmers, union workers, teachers and small businesses everywhere. We cannot continue to depend on OPEC+ to fuel

America. Relying on foreign nations to provide energy for our citizens creates unnecessary economic volatility.

Further, depending on OPEC+ and other sources rather than producing in the Gulf of Mexico will hinder America’s climate goals. Shutting down or severely curtailing leasing will impede progress toward net-zero targets by adding as much as 100 million metric tons of CO2 to the atmosphere every year through 2040, according to a recent McKinsey & Co. study ⁱ – roughly the same carbon footprint as putting 21 million cars on the road annually. This 2022 study bolsters the findings of a 2016 BOEM study which says greenhouse gas emissions could increase in the absence of leasing in the Gulf of Mexico. ⁱⁱ

Reliance on external actors places us in the vulnerable economic position we were in for decades, before we were able to meet the majority of American demands with U.S.-produced energy. Relying on higher-carbon energy supplies from our adversaries will make our country, our allies and the world less secure, and expose us again and again to high energy prices that will cripple the economy and global environmental progress.

Over the past year, high fuel prices have hurt the livelihoods of American families and businesses. Gasoline prices have risen drastically since January 2021, reaching a record of over \$5.00 per gallon this summer. As of June 2022, almost [two-thirds of American consumers were living paycheck to paycheck](#). American families and businesses cannot continue to bear the burden of inflation due to high prices for gasoline and consumer goods. Maximizing domestic resources with federal offshore oil and gas leasing will provide reliable, affordable energy and economic certainty for consumers nationwide.

CEA urges you to finalize the Proposed Program with all proposed lease sales intact and to hold new offshore oil and gas lease sales as quickly as possible. Implementing these actions is critical to our nation’s long-term economic stability and national security.

Thank you for your consideration.

Respectfully submitted,



David Holt
President
Consumer Energy Alliance

ⁱ McKinsey & Company, “How the Gulf of Mexico Can Further the Energy Transition”
<https://www.mckinsey.com/industries/oil-and-gas/our-insights/how-the-gulf-of-mexico-can-further-the-energy-transition>

ⁱⁱ Bureau of Ocean Energy Management, “OCS Oil and Natural Gas: Potential Lifecycle Greenhouse Gas Emissions and Social Cost of Carbon”: <https://www.boem.gov/sites/default/files/oil-and-gas-energy-program/Leasing/Five-Year-Program/2017-2022/OCS-Report-BOEM-2016-065---OCS-Oil-and-Natural-Gas--Potential-Lifecycle-GHG-Emissions-and-Social-Cost-of-Carbon.pdf>