



DEPARTMENT OF THE NAVY
THE ASSISTANT SECRETARY OF THE NAVY
(INSTALLATIONS AND ENVIRONMENT)
1000 NAVY PENTAGON
WASHINGTON, D.C. 20350-1000

APR 10 2006

Ms. R. M. "Johnnie" Burton
Director, Minerals Management Service
U.S. Department of the Interior
Washington, DC 20240

Dear Ms. Burton:

This is in reply to your letter to Secretary Rumsfeld requesting comments on the Department of the Interior's Draft Proposed 5-Year Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2007-2012. I am responding as the Defense Department's Executive Agent for OCS matters.

The Department of Defense has reviewed the draft proposed program and the seven OCS planning areas proposed for leasing. Based on our review, we foresee no OCS-use conflicts within the lease sale areas proposed for the Alaska Planning Areas, and only minimal conflicts with the proposed lease sale areas within the Gulf of Mexico Planning Areas. We have considerable concern, however, with the proposed lease sale areas within the Mid-Atlantic Planning Area off the coast of Virginia.

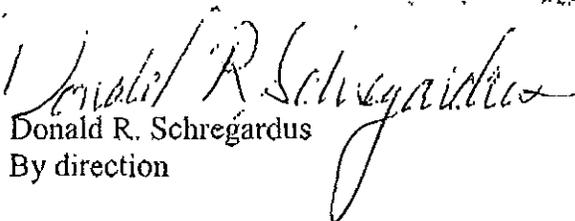
Notwithstanding the above, the eastern Gulf of Mexico remains an area of importance to the Department of Defense because of the critical military test and training activities the Department conducts there. These activities, which are intensifying, require large, cleared safety footprints free of any structures on or near the water surface. Because the majority of the new Gulf of Mexico proposed sale area is west of the Military Mission Line (MML), 86° 41' W longitude, the new proposed program should not present unmanageable effects on military test and training. A small area in the southeastern most portion of the Central Gulf Planning Area crosses the MML, an area that the Secretary of Defense has stated is incompatible with drilling structures and associated development because of the diversity of military testing and training activities conducted there now, and those planned for the future. We therefore request this area be removed from the program. Also, stipulations mirroring those contained in current leases held by the oil/gas lessees will need to be included for new program areas that overlap our Gulf Range Water Test Areas. An example copy of the current stipulations is enclosed.

The draft program option of greatest concern to the Department of Defense involves the special interest sale proposed for the Mid-Atlantic off the coast of Virginia. The proposed area lies within the Virginia Capes (VACAPES) Operations Areas where the Navy's training and test and evaluation community conducts significant activity.

This is the Navy's primary area for weapons separation testing, conducting supersonic flight profiles, and performing target launches in support of acquisition programs and ship qualification testing. It is the designated area, both for test and evaluation and for training missile launches, that requires cleared sea space as an impact area. It is also the Navy's primary area for conducting autonomous underwater vehicle testing from submarines. The VACAPES undersea, surface, and air space areas are critical to the development, fielding and certification of naval weapon systems; as a consequence, the Navy requires unencumbered access to the full expanse of this operations area. The Navy, Army, Air Force, and Marine Corps all use the VACAPES Operations Areas. Training operations that occur in the proposed oil and gas use area include aircraft carrier operations, amphibious vehicles operations, gunnery training, and F/A-18, F-15, F-16 and F-22 guns firings. Any structures built in the water where these types of activities are conducted, particularly low-level gunnery practice and missile separation testing, would restrict where military air wings can fire their weapons, drive aircraft further away from the coast, increase fuel costs and wear and tear on the airframes, increase flight times en-route to training areas, and increase the risk to aircrews due to the increased distance from emergency recovery bases. Because hazards in this area to operating crews and oil company equipment and structures would be so great, the Department opposes oil and gas development activity in this OCS planning location.

The Navy has compiled an exhaustive and detailed assessment of the type, frequency, and sponsor of activities conducted in the VACAPES Operations Areas. This includes both current and future test activity and training. We are prepared to share this data, should it be necessary, with members of your staff that have appropriate clearances. We have attached for your immediate reference a map of the VACAPES test, evaluation, and training complex and a brief synopsis of the important military activities conducted there.

We support the promotion and production of offshore oil and gas exploration that is critical to our country's energy and national security and look forward to working with you and your staff in the period ahead to ensure success in this area.


Donald R. Schregardus
By direction

Enclosure