



Bureau of Safety and Environmental Enforcement

# Rigs-to-Reefs Program History and Policy Overview

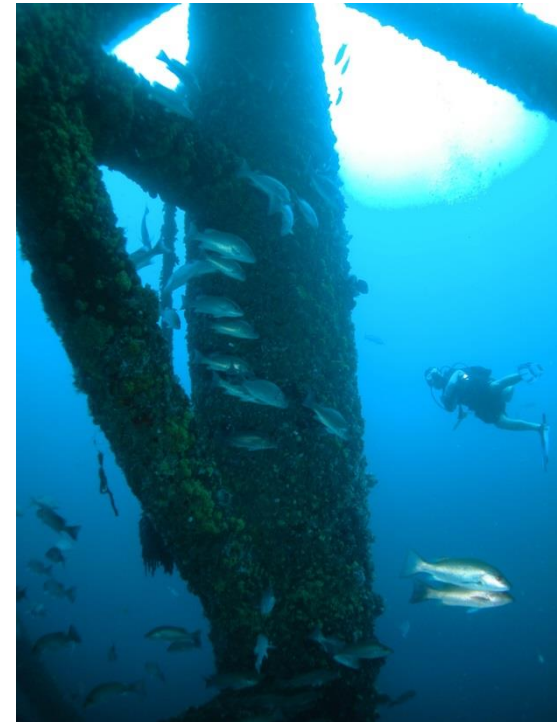
Douglas Peter  
December 2020

*“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”*

# Rigs-to-Reefs

## Alternative to Onshore Disposal

- Minerals Management Service (MMS), the predecessor of BSEE, was a key figure in artificial reef policy, studies, and cooperation in the early 1980's
- Platform jacket design allows for effective water circulation
- Jacket material is a durable, stable and complex hard substrate for a host of marine organisms
- Jacket profiles support marine species throughout the water column



# National Fishing Enhancement Act of 1984

Directed the Secretary of Commerce to develop:

## ○ National Artificial Reef Plan

- NOAA Technical Memorandum, NMFS OF-6, 1985, Amended in 2007
- Designed to be a dynamic working document
- Promotes responsible effective artificial reefs
- Iterates the importance of artificial reefs as a Fisheries management tool
- Endorses the involvement of state natural resource agencies
  - Reef development in state and federal waters
  - Ensure compatibility with fishery management
  - Ability to assume long-term liability



# Rigs-to-Reefs

## BSEE\MMS Rigs-to-Reef Policy History

- 1983: Testified before U.S. House of Representatives
- 1985: MMS\BSEE Rigs-to-Reefs Program was formalized
- 1998: Reissued Rigs-to-Reef Policy
- 2000: Rigs-to-Reef Policy Progress, and Perspective (MMS 2000-073)
- 2009: Rigs-to-Reef Policy Addendum: Enhanced Reviewing and Approval Guidelines in Response to the Post-Hurricane Katrina Regulatory Environment
- 2013: Interim Policy Document
- 2019: Directive Supplement
  - 550.4 DS-G
  - Current BSEE Rigs-to-Reef Policy



# Rigs-to-Reefs

## Policy Addendum (2009)

- Outlined enhanced reviewing and approval guidelines in response to the Post-Hurricane Katrina regulatory environment
- “Put the Brakes” on dozens of reef proposals incorporating platforms destroyed or toppled during the 2005-2008 hurricane seasons that were not adequately prepared for reefing and outside traditional reef planning areas
- Helped the agency tackle public criticism and NGO assertions that Rigs-to-Reefs was becoming a de facto “Ocean Dumping Program”

# Rigs-to-Reefs

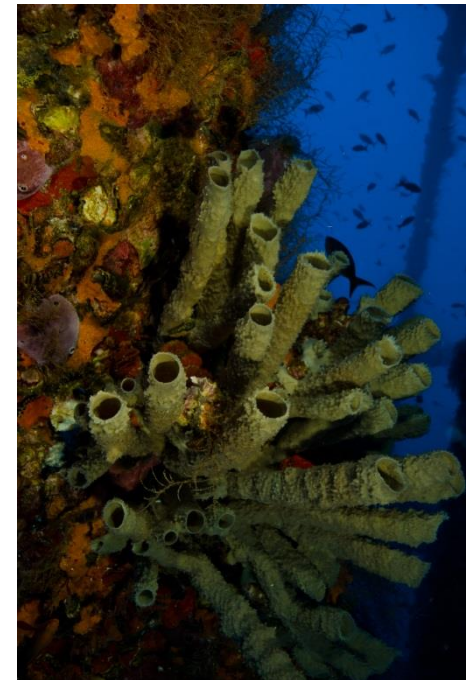
## Directive Supplement 550.4 DS-G (2019)

- Transitioned from Interim Policy Document 2013-07
- 2013 IPD was conclusion of the Federal, State, and public coordination recommended in the 2009 Rigs-to-Reefs Policy Addendum
- Evaluates reef proposals on a case-by-case basis
  - Evaluated for adherence to engineering and environmental standards
  - Allows reefing in place where appropriate
- Allows for time extensions to regulatory deadlines provided companies are actively pursuing a viable reef option
- Eliminates storm-toppled platforms from consideration as reefs

# Rigs-to-Reefs

## Alternative to Onshore Disposal

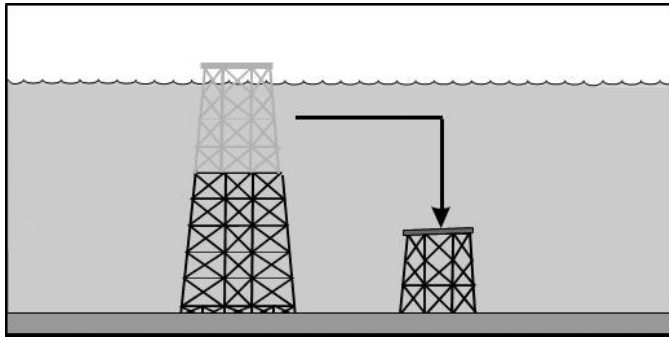
- BSEE continues to support and encourage the reuse of obsolete platform jackets as artificial reef material and will grant a departure from removal requirements under 30 CFR §250.1725(a) and applicable lease obligations provided that:
  - The structure becomes part of a State reef program that complies with the National Artificial Reef Plan
  - The State agency acquires a permit from the Army Corps of Engineers and accepts title and liability for the reefed structure once removal and reefing operations are concluded
  - The operator satisfies any U.S. Coast Guard navigational requirements for the structure
  - The reefing proposal complies with BSEE engineering and environmental reviewing standards.



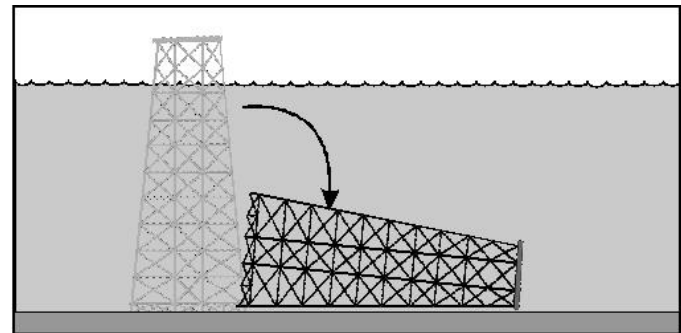
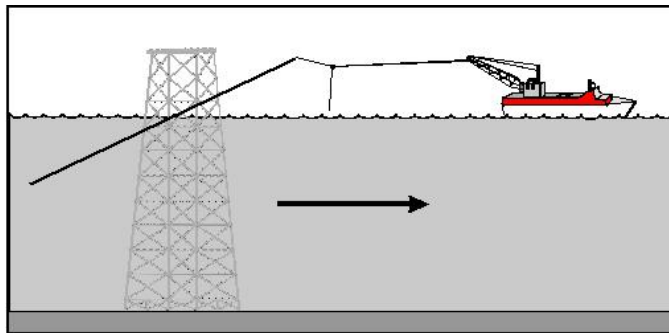
# Rigs-to-Reefs

## Standard Alternatives to Onshore Disposal

- Partial Removal (in place)



- Tow and Topple



# Federal Gulf of Mexico Oil & Gas Platforms

Federal Water Platforms	
	Standing
<b>0-100 ft</b>	<b>1130</b>
Caissons	395
Fixed Platforms	729
Well Protectors	6
<b>101-150 ft</b>	<b>171</b>
Caissons	7
Fixed Platforms	164
<b>151-200 ft</b>	<b>135</b>
Caissons	1
Fixed Platforms	134
<b>&gt;200 ft</b>	<b>328</b>
Compliant Tower	3
Fixed Platforms	276
Floating Production Storage & Offloading	2
Mobil Production Units	1
Mini Tension Leg Platform	4
Semi Submersible	10
SPAR Platform	18
Tension Leg Platform	14
<b>Grand Total</b>	<b>1764</b>



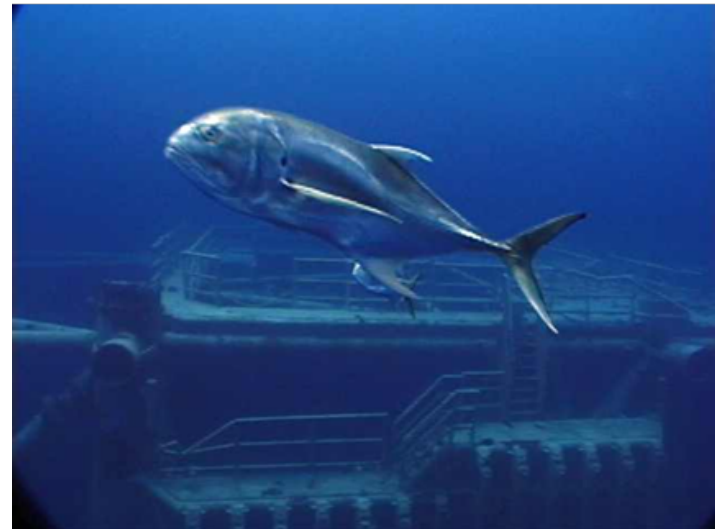
# Federal Gulf of Mexico Oil & Gas Platforms

All Gulf States as of Dec. 31, 2019	
Depth Range	% Reefed
0-100 ft	1.10%
101-150 ft	17.25%
152-200 ft	40.90%
>200 ft	63.13%
<b>Overall</b>	<b>11.30%</b>

All Gulf States 1987-2019
<b>Total Reefed</b>
558
<b>Total to Shore 1987-2019</b>
4736
<b>Total Standing Platforms</b>
1764

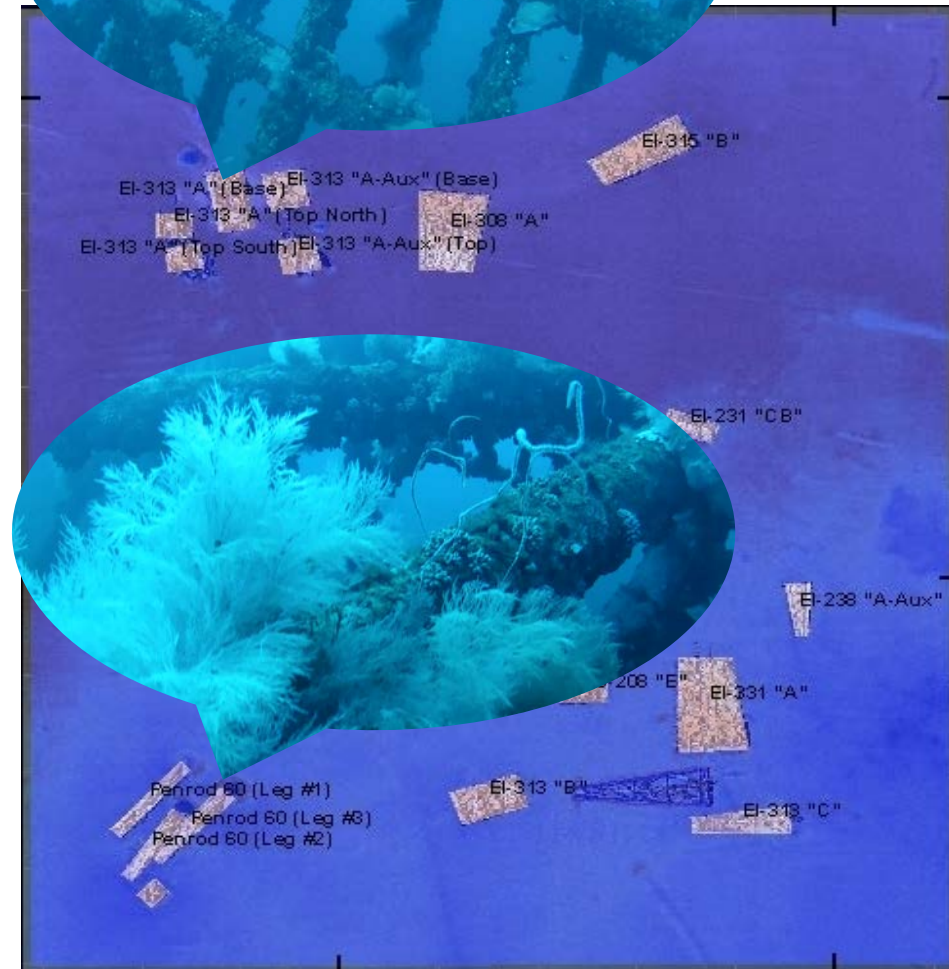
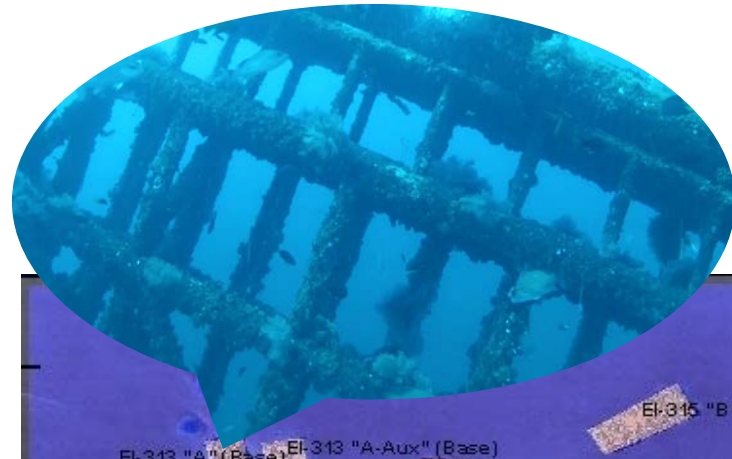
**Does not include  
state water platforms**



# Rigs-to-Reefs

## Eugene Island 313 Reef

- 179 acre permitted reef area (2550' x 3048')
- Water depth 240'
- Navigational clearance 90'
- 19 Oil & Gas Structures deployed



BSEE Website: [www.bsee.gov](http://www.bsee.gov)



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