



June 20, 2023

Transmitted via email and regulations.gov

Ms. Bridget Staples, MPH
Water Protection Division
U.S. EPA Region 4, NPDES
61 Forsyth Street SW
Atlanta, GA 30303-8960

RE: Request for Extension of Comment Deadline: Notice of Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Eastern Portion of the Outer Continental Shelf (OCS) of the Gulf of Mexico (GEG460000); Availability of Draft National Environmental Policy (NEPA) Categorial Exclusion (CatX) (88 FR 37878 (June 9, 2023)).

Dear Ms. Staples:

The Offshore Operators Committee (OOC) respectfully requests that the Environmental Protection Agency, Region 4 (EPA R4) extend the comment period on the proposed Notice of Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Eastern Portion of the Outer Continental Shelf (OCS) of the Gulf of Mexico (GEG460000); Availability of Draft National Environmental Policy (NEPA) Categorial Exclusion (CatX) by an additional 30 days. OOC supports the goals of the (NPDES) program, but the current 30-day comment period does not allow stakeholders to effectively comment on this draft permit.

OOC member companies represent approximately 90% of the oil and gas production in the Gulf of Mexico OCS, and the proposed changes to the NPDES permit have the potential to impact existing and future operations of all our member companies. As you are aware, OOC member companies have been constructive participants in the NPDES permitting process, but we are seeking additional time to fully review and consider the extensive docket material.

The proposed record is 207 pages long and will require additional time for substantive review and comment. An extended comment process would allow our members to meet as a collective representation of the impacted industry, discuss the merits of the proposed permit and develop a set of consolidated comments. Additional time is necessary so that meetings, conference calls, and other engagements can be held among our membership.

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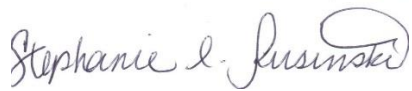
The 4th of July holiday falls within the comment period. This is traditionally a time when many of our members will be out of the office and away from their normal duties, which effectively shortens the time in which comments can be fully discussed and developed.

In addition, many operators have a July 10, 2023 compliance deadline to submit Notice of Intents to retain coverage under the recently issued Region 6 NPDES permit. Preparation of these Notice of Intents will reduce availability for key staff for review of the 207 pages of material and preparation of comments.

OOC fully supports EPA R4's objectives to protect OCS water quality. We believe that an extension of the comment period will allow all interested stakeholders, and the public, the necessary time to provide meaningful input to the agency, ultimately resulting in a stronger, more effective permit.

We appreciate your time and efforts regarding the draft permit. If you have any questions or if additional information is needed, please contact me at (832) 303-9926 or at stephanie@theooc.org.

Yours truly,

A handwritten signature in cursive script that reads "Stephanie L. Kusinski".

Stephanie Kusinski
Manager
Offshore Operators Committee

cc: Karrie-Jo Shell, P.E.