

## STATE OF NORTH CAROLINA Office of the Governor 20301 Mail Service Center • Raleigh, NC 27699-0301

MICHAEL F. EASLEY GOVERNOR

January 8, 2009

Mr. Randall B. Luthi Director, Minerals Management Service United States Department of the Interior 1849 C Street, N.W. Washington, DC 20240

Dear Mr. Luthi:

I am writing in response to the Call for Information and Interest/Nominations and the Notice of Intent to prepare an Environmental Impact Statement (EIS) for Propsed Sale 220 off the coast of Virginia.

At the federal level, we have a changing of the administration, ongoing federal discussions about the nature and scope of OCS activities, and no viable solution to address affected states' interests, financial and otherwise, in what happens off their coastlines. In light of these circumstances, I find your agency's decision to move forward with this sale is ill-timed and ill-advised. It is apparent that the seismic surveys indicating the types and amounts of oil and gas resources as well as the biological and environmental data necessary to evaluate the possible impacts of such a sale are not currently available. Indeed, under your agency's timeline for conducting this sale, even if the process of gathering this data began immediately, the necessary information would not be available in time to be relevant to the consideration of Proposed Sale 220.

Since the inclusion of this proposed sale in the OCS Oil and Gas Leasing Program, 2007-2012, I have personally expressed North Carolina's concern with the proposal, and the North Carolina Department of Environment and Natural Resources has provided extensive comments on the environmental, technical and other aspects of the proposal. The area of the proposed sale is in close proximity to North Carolina's coastal and estuarine resources, and drilling in this area may have far-reaching environmental and socio-economic impacts on our State. While I recognize the need to expand domestic supplies of energy, it is imperative that we have full information to evaluate the potential impacts of any offshore activity on North Carolina and its natural resources.

Moreover, I believe the United States must think strategically about our domestic oil reserves and their role in securing our energy independence. Currently untapped resources, including those off the East Coast, should be treated as a savings account to be tapped when our nation truly needs them, not simply auctioned to the highest bidder. Mr. Randall B. Luthi Page 2 January 8, 2009

Given the lack of essential information to support this proposed sale, as well as the expressed concerns of the States of Virginia and North Carolina, I urge you to suspend Lease Sale 220 until the impacts of this proposal can be far better understood. I appreciate the opportunity to offer comments on this Call, and respectfully request your full consideration of North Carolina's interest in this matter.

With kindest regards, I remain

Very truly yours,

Michael F. Easley

MFE/jlb

cc: Carrol Williams, Sales and Support Unit Supervisor, MMS Gulf of Mexico OCS Region

Gary Goeke, NEPA/CZM Coordination Unit Supervisor, MMS Gulf of Mexico OCS Region