

## Interview Summary Form

### Interview Details

Interviewee Names:	<b>Rusty Wright</b>	Date:	<b>10/20/10</b>	Time:	<b>1:00pm</b>
Interviewee Title:	<b>BOEMRE GOM Oil Spill Regional Administrator</b>	Interviewee Job Location	<b>New Orleans, LA</b>		
Interviewer Name(s):	<b>David Moore, Larry Dietrick, Brian House, Bruce Johnson, Greg Pollock</b>	Interview Location:	<b>In person</b>		

### Interview Summary

#### Can you talk about your role in the response?

- I have worked for MMS, now Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) for 13 years. I am the GOM Oil Spill Regional Administrator. In that role I review and approve of oil spill plans, oversee the BOEMRE drill program, sit on RRT-4 and RRT-6, and I coordinate input into our oil spill research program.
- If an operator, like BP, has multiple facilities in the central and western gulf, they can have a regional plan that covers all of them.
- Eastern gulf is separate from central and western gulf, which is considered as one area. This is because FL, which is an affected state, wants to have input into that process. The other states, they were not interested.

#### You mentioned that FL reviews these plans. Is this a legally mandated review or a courtesy review?

- Courtesy review. MMS/BOEMRE has MOUs with all the states; the plans are made available for them to look at, but they do not have a legal approval authority.

#### We have heard that BP has a Macondo well-specific plan, is that correct?

- They did not. BP had a regional plan that covers all of their facilities in the central and western gulf. That plan had three WCDs in it. 1) A near-shore WCD (i.e., closer than 10 miles to the shore); 2) an offshore WCD (i.e., outside 10 miles); and 3) an exploratory WCD. This exploratory WCD can be anywhere (i.e., close or far from the beach), but because it is an exploratory well, there is higher risk, since they don't know what they have (and therefore there needs to be a separate WCD for this type of well). Because BP had multiple exploratory wells, they had to use the highest WCD rate and put into their plan. That WCD was 250k barrels a day. For the Macondo 252 well, its WCD was 162k barrels per day. But since it didn't exceed what was in the existing Regional Oil Spill Response Plan (OSRP) they didn't have to update their spill plan. As of 4/19/10, we were doing it based on how we had done it for the last 13 years. On 4/20/10, the paradigm shifted. DWH has changed how we now evaluate spill response in open water.

#### Is the spill from a well blow out treated as a one-day, albeit large release, or as a series of releases over 30 days?

- The plan doesn't address if the spill continues over time. But they have to be prepared to respond for 30 days. It is almost like a tanker spill, but with a much bigger spill volume. In other words, there is a 250k barrel event and they have to clean it up in 30 days. It is not a 250k barrel event occurring every day for 30 days.

#### Can you discuss how the WCD in a plan is reviewed and how do you evaluate the WCD?

- On 4/19 (or before), when we received a plan and the WCD says 250k barrels/day, we required the operator to describe their response tools. We were interested in their effective daily recovery capacity (EDRC), their skimming capacity and their storage capacity. Essentially, we were looking to ensure they had response tools for 200% of their WCD identified in the plan. The skimming capacity, dispersants, all of those things listed in the plan met our criteria to meet initial volume that is the bar/standard that we approved. 200% is not in regulation anywhere. I don't know where it came from. It made more sense than less than 200% I guess. That is where we were at the time. For small operators, we still looked for 200%-that was the bar that operators had to get to in their plan for it to be approved.

**Is this 200% of the WCD required to be on scene in a particular amount of time?**

- No, there was no time.
- This changed as of 4/20/10. For example, say there is a 25k barrel WCD. We now require that they initiate response within 2 hours and get on scene to see what is going on (i.e., have eyes on) in 2 hours. As part of the planning process, the operator with this 25k barrel WCD is allowed/encouraged to run that volume through the oil weathering model (ADIOS). If the weathering rate is 30%, you subtract 30% for weathering. The remaining volume, the operator had to address through dispersants, skimmers, etc. We don't require that they have to skim all of the oil; the operator can use all the tools in toolbox, as long as they are pre-approved for use in the gulf. Continuing with the example, if you have 20k barrels left after running the WCD through the ADIOS weathering model, they had to have a tiered response to that value. In 24hrs, have to be able to address 50% of that volume with response tools, in 36 hrs, have to be able to address 100% of that volume with response tools. Similarly, in 48 hrs, have to have 200% and in 60 hrs, have to have 400%.
- These are the numbers we are now asking operators to plan towards. This new interim guidance started in mid-July. These values came about after discussions within BOEMRE.
- This new interim guidance also covers other things. For example, it requires operators to put maps in their plans so that others know where their stuff is. This is because a lot of responders are not aware of GOM and know where to go. We have asked for operators to add x-band radar and infrared capability so that eventually, we can do 24/7 skimming operations.
- This is interim guidance until the final rule comes out. These new guidelines are definitely upgraded roles. Fortunately, post-DWH, the amount of resources in the GOM has increased so these numbers will be able to be met going forward.

**To go back to the proposed regulation that would require the plan holder to achieve 100% on scene in 36 hours and then 200% on scene in 48 hours. Is the volume calculated in a way that it grows incrementally over time (i.e., builds upon itself)? If that is the case, it would seem that you would never be able to catch up. Did I characterize this correctly?**

- No, it doesn't keep building like you described. What you have to remember is even if the WCD is a huge number, you have to take into account weathering first, which lowers the value. Then you can subtract for dispersants and ISB off the top. Only then does EDRC come into play.

**What role did USCG play in commenting on what was then a MMS response plan?**

- If you asked me on 4/19/10, USCG played no role. We have MOUs to share information, but they don't have review and approval authority. Before I came on board, USCG 8<sup>th</sup> District looked at the plans, but it has been years since they have looked at these plans. During the Petrobras oil spill plan development, we did work with USCG to come up with a plan for everything, including oil and natural gas releases for that vessel. There are some questions related to these spill response plans and how you divide response plans for entities that are both platforms and vessels; this is a USCG issue.

**Had USCG reviewed BP's regional plan, would have it made any difference during the response?**

- I don't think so. I don't see it. I don't think so. If all the states and/or USCG reviewed BP's plan, it still would have been approved.

**So everyone had the same underlying approach to response?**

- Yes, USCG, EPA, DOT/PHMSA, DOI, we talk about all of these issues very often. We have meetings twice a year. All agencies are aware of the large WCD for GOM wells. We would talk about this at RRT meetings and during exercises. We were aware they were a potential issue, but probably not ready to respond to one.

**Did the counties or parishes ever ask to be involved in the process?**

- No. No government entities asked to be involved. This specific plan, I reviewed.

**How are WCD scenarios translated into ACPs if USCG is not engaged in OSRP review process?**

- This is a shortfall. We need to incorporate these things. MMS was involved in Area Committee in New Orleans and Houston, but there are 3 others that we aren't really active in. It is an opportunity for improvement for BOEMRE. Counties and parishes, have response plans that will be rolled into ACPs, so they will be aware of our large WCDs.

**Did you participate in Morgan City Area Committee? Did you attend any of the other Gulf Area Committee meetings?**

- Yes, New Orleans always. For Sector Morgan City, I tried to attend most of their meetings. There is a BOEMRE engineer in Lake Jackson who sits on Houston/Galveston Area Committee and attends their meetings.

**Were you aware that USCG listed 1M barrels/day as a WCD in the Morgan City ACP? Do you have any idea where that number came from?**

- I do not. From my knowledge of that Area Committee, I just think they picked the number.

**Do you think that the 1M barrel/day WCD value in the Morgan City ACP is associated with another well? Are there any wells in the Gulf that have a WCD more than the BP well?**

- The largest WCD is 250k barrels. It was 300k barrel at one point, but it has since come back to 250k barrels. There isn't a well that has a WCD of 1M barrels/day. Incidentally, the 250k barrel/day WCD is for a BP well; BP's is the highest one in the GOM. BP is currently updating their OSRP and I expect they will provide it to us next week. I have a feeling that the 250k barrel/day volume will go up

**What factor was used to calculate WCD volumes? Can you explain how this value could come about? Who signs off on plan?**

- I can't. I wasn't involved in WCD discharge calculations.

**Is there a requirement for response?**

- These plans have a WCD. The WCD volume in the plan is to show us they have the planning capacity to respond to spill that big. The operator has the ability to plan and respond to a spill that big. They respond to what they think is "appropriately." Once oil is in the water, all responsibility goes to the USCG.

**In this response or any response, once the UC set up, what role does BOEMRE/MMS play? Are you in command post?**

- I was in the Houma ICP as an agency in support of the FOSC. I also had people in the Houston ICP that were advising the people there.

**So in a sense you have a similar role to a NOAA SSC?**

- Yes.

**Do you embed in either the Environmental Unit or the Planning Section?**

- We plugged into wildlife and shoreline protection. We were on the team in support of the response. We also had people at the UAC that were agency reps for the spill response and were advising the FOSC.
- For source control, we were advising President Obama through the Secretary of DOI. Source control was a bigger organization that what was involved in the usual ICS because politics got involved.

**Were you involved in any of the dispersants decision-making?**

- I pushed hard for dispersants. I brought the subsea dispersants idea to the command. Dan Allen had the original idea.
- I also pushed hard to have remote video projected in the ICP.

**Were you involved in the RRT discussions related to dispersants?**

- Yes, I sat on most calls. I had a line through DOI into the RRT.

**Is there anything specific in the OSRP that you require for near operations?**

- We require that the operator protect shoreline with the highest risk. We have a model that shows where the oil will likely go. We require the operator to plan a response for that section and list equipment and people needed to mitigate it. This is Appendix H of the plan.

**Were you involved in the flow rate estimation?**

- No, we didn't feel like it was right. That said, I knew 1k/day barrels was wrong, but didn't have a way to have input, as that value was coming out of the UAC. The UAC was controlling the number. It just seemed like it was more than 1k barrels a day to me. From my perspective, that value didn't slow down BP. They were throwing everything they could. Maybe at times what they were doing was not efficient or smart, but they were open to any idea and open to spending on pretty much anything. Their questions on the use of subsea dispersants were minimal. Money was no object to them.

**Can you comment on the decision the President made to triple the resources?**

- No idea. It sounded like a political number. To me, it just bottlenecked logistics, reduced effectiveness and slowed things down.

**Can you comment on the cascading of resources?**

- I know the boom war story that ADM Landry tells. It challenged the response, common sense, the supply lines, people's ability to put up with that, and generally hindered the response. Did they do the best for their citizens? Yes, but it was out of control.

**From your perspective, what went well?**

- From my view of the response, BP put 100% of their effort towards this event. Their senior management was involved, they had unlimited resources and they didn't hesitate.

**From your perspective, what went wrong?**

- This is a shortfall for any large response, it had structural problems. Growing the sub-branches took too long to do.
- Logistics for a response this big was a challenge. USCG is not the military. Moreover, they hadn't practiced it. They were learning as they went along.
- Political demands on response organization. It drove the response away from the oil.
- Other opportunities for improvement include, improving operators' plans to get quicker over-flights after a spill, having better maps, incorporating new technology like x-band radar and infrared, and tiering response in a way to get more equipment to the source quicker. That is the way we need to go forward.
- We need to figure out how we incorporate subsea containment and include it in our BOEMRE requirements.
- We need to get to the source quick and get our arms around the slick. We can't win once the oil gets too loose.