



Comment on 11th National Outer Continental Shelf Oil and Gas Leasing
Draft Proposed Program: 1st Analysis and Proposal MAA104000
Docket ID No. BOEM-2025-0483-0001

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January 23, 2026

The Institute for Energy Research strongly supports increasing the amount of offshore acreage available for leasing in all OCS regions. The proposed 2026-2031 leasing plan is a positive start, however we would urge BOEM to increase the scope of waters available for lease.

BOEM proposal should expand available leasing beyond just known technically recoverable

The proposal's focus on leasing areas covering 85% of technically recoverable reserves is misguided. Currently known technically recoverable reserves are only a portion of the total potential of the federal offshore estate. Limits on seismic testing and exploration for the last several decades mean that in many OCS planning regions the federal government does not have an up-to-date picture of technically recoverable reserves. Drilling technology continues to advance significantly and this means that old estimates of technically recoverable reserves are out of date. Instead, BOEM should change to a default assumption that all areas are available should a nominating party wish to explore or lease. This will allow for potential new discoveries that are not anticipated using current estimates.

The trajectory of recent offshore production increases also argues in favor of expanding the scope of leasing. While price fluctuations and hurricane activity in the Gulf reduced production in 2020 and 2021, the long-term investments made prior have since allowed federal offshore production to reach new record highs in 2024 and 2025. This supports BOEM making the maximum amount of waters available for leasing because development that may look speculative today can be new record production in a few years.

Creating a separate planning area for the distant offshore eastern Gulf

IER supports BOEM efforts to create a new South-Central GOA planning area in the Gulf. This area is adjacent to known reserves and has strong investment and development interest today. It is also well beyond the range where it would have significant impacts on the Florida coastal economy. This distant part of the Gulf has been unnecessarily restricted for far too long and it is long past time to allow development.

Creating a new planning area will allow this distant offshore region to be considered for leasing independent of near-offshore areas. There are understandable objections from Florida communities to development nearby. But the physical and visual impact of oil and gas development in those near-offshore areas (on beaches, for example) is very different than the potential impacts from distant offshore areas. These very different conditions are best considered independently. Separating distant offshore from near-offshore will allow those different factors to be considering in an objective manner.

IER strongly encourages BOEM to proceed with the creation of this separate planning area even if it is ultimately determined based on comments or political considerations that leasing not be offered in the new planning area in the current five year plan. Separating consideration of near and distant offshore is an important improvement for long term planning and will allow for better decision-making in future offshore leasing plans.

California leasing

Finally, IER strongly supports the inclusion of leasing opportunities off the California coast. California has some of the largest known reserves in the U.S. Public fearmongering has unnecessarily restricted the development of these resources. While the state of California may have the ability to suppress oil production within the state itself, the state cannot be allowed to prevent development in federal waters. Those waters are public waters and the revenue benefits to the nation as a whole are significant. State politics should not be allowed to override national public benefits.