

The Methane Hydrate Advisory Committee

Advisory Committee to The Secretary of Energy

March 12, 2018

The Honorable Mr. Rick Perry
Secretary of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Secretary:

Subject: DOE Regulations Reform Response

The Methane Hydrate Advisory Committee (MHAC) appreciates the invitation from Secretary Perry to provide input on potential reform of DOE regulations, guidance, or policies. The MHAC does not think that the DOE regulations and policies would adversely affect the US DOE Methane Hydrate Research Program, but the former could be enhanced to better allow research organizations (e.g., universities) to manage field programs. It has been observed that the DOE procedural framework has largely been written with industry in mind, which makes it challenging for qualified non-industry groups to lead research projects. For example, DOE could review policies that: limit select activities under funded work (e.g., marine seismic); require cost share for clearly pre-commercial R&D; and restrict select groups from leading projects proposed under competitive announcements.

The MHAC does have some general recommendations for improving the efficiency and timeliness of the process for obtaining the numerous Federal permits needed for acquiring field research data, such as data on methane hydrates. The key goals of the US DOE Methane Hydrate Research Program are to drill, core and conduct short and long term experimental flow tests of gas hydrate accumulations onshore in Alaska and offshore in the Gulf of Mexico. These drilling, coring and flow tests will be conducted at subsea depths down to several thousand feet. In the Gulf of Mexico, drilling, coring and flow testing will be managed by university partners and will require significant advance planning and permitting. Currently the permitting process requires a lead time of up to a year or more in advance of the activity. This permitting process involves many different agencies whose requirements, processes and timeframes for response and approval, or denial vary greatly. The agencies often do not support pre-application consultation with the applicant. The MHAC recommends that the permitting agencies could make the process both more streamlined, efficient and timely by supporting pre-application consultation (see Texas RRC, AOGCC), and by selecting a lead permitting agency that would coordinate the agency information requests and response times.

Sincerely yours,



Carolyn A. Koh (Chair) & Miriam Kastner (Vice-Chair)
On behalf of the Methane Hydrate Advisory Committee

(Note Abstentions from: R. Kaminsky, J. Thurmond)

cc: Mr. Daniel Simmons
Principal DAS, Energy Efficiency, EE-2
Lead, Regulatory Reform Task Force
1000 Independence Avenue, SW
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cc: Mr. Rob Smith
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The Methane Hydrates Advisory Committee (MHAC) (2017-2019)

Chair: Carolyn A. Koh

Professor Carolyn Koh is the William K. Coors Distinguished Chair and Professor in the Chemical and Biological Engineering Department at the Colorado School of Mines (CSM). She studies the interfacial interactions of natural gas hydrates in multiphase flow and offshore conditions. She is the Director of the CSM Center for Hydrate Research, which involves a consortium of energy industries to develop and advance new flow assurance strategies to ensure uninterrupted production of oil and natural gas in subsea flowlines. She has served on several key national and international advisory committees, and has a prolific publication and mentorship record in gas hydrate research.

Vice Chair: Miriam Kastner

Miriam Kastner is the Distinguished Professor of Geosciences at the University of San Diego, Scripps Institution of Oceanography. She is an oceanographer and geochemist that combines mineralogical and geochemical expertise to tackle a range of geoscience problems. She has sailed on countless marine science expeditions, many of them focused on hydrate research. She has served on dozens of key national and international advisory panels and editorial boards for prestigious journals, acting as an outspoken advocate for science of the highest quality.

Dr. Thomas Blasingame	Texas A&M University, College Station, TX
Dr. John Thurmond	Statoil Gulf Services, LLC, Houston, TX
Mr. Daniel McConnell	Fugro, Houston, TX
Dr. Matthew J. Hornbach	Southern Methodist University, Dallas, TX
Dr. Joel E. Johnson	University of New Hampshire, Durham, NH
Dr. Robert D. Kaminsky	ExxonMobil Upstream Research Co., Spring, TX
Dr. Robert L. Kleinberg	Schlumberger-Doll Research, Cambridge, MA
Dr. Michael Max	Hydrate Energy International, Inc., Washington, DC
Dr. George J. Moridis	Lawrence Berkeley National Lab, Berkeley, CA
Dr. Mark D. Myers	Principal, Myenergies
Dr. Craig Shipp	Shell International Exploration and Production Inc., Houston, TX
Dr. Evan A. Solomon	University of Washington, Seattle, WA