As the Washington Post\_points out today, BP's <u>Regional Oil Spill Response Plan</u> (large file) for the Gulf of Mexico was, like <u>the NEPA analysis</u> and <u>the ESA analysis</u>, wildly overoptimistic. The Response Plan is more realistic than the NEPA documents with respect to the possibilities. It does include worst case scenarios (Appendix H). The scenario for a blowout from an exploratory offshore well forecasts a discharge of up to 250,000 barrels (more than 10 million gallons) per day (App. H, p. 30). That's more than is currently thought to be gushing out of the ruptured well.

BP suggested it would have even such a catastrophic blowout well in hand. The company acknowledged that there was a 20% chance that such a spill from a western Gulf location would reach land in Plaquemines Parish, LA, but estimated only a 1% chance after 30 days of gushing that oil would contact more distant gulf shores. (Meanwhile today we get word of tarballs from the Deepwater Horizon disaster on Galveston beaches.) Offshore, BP said that it could deploy skimmers

which have a combined derated recovery rate of 491,721 barrels/day. (App. H, p. 32)

I confess that I do not know what a "combined derated recovery rate" is, but it's clear that BP can't skim off anything close to 500,000 barrels a day, even having had more than two months to move equipment into the area. According to the Post report, as of today

Skimming has captured only 67,143 barrels, and BP has relied on burning to remove 238,095 barrels.

It doesn't appear that anyone at MMS or the Coast Guard questioned the assumptions in the Response Plan. In fact, they may not even have read it. The most cursory review should have raised red flags. The Response Plan noted that less than 300,000 barrels of storage capacity (total) were available. If more than that were skimmed off every day, where was it supposed to be put? And the Plan is internally inconsistent. Although the offshore worst case scenario says that skimming capacity is 491,721, another scenario in the same document reports that capacity at 339,207 barrels/day (App. H, p. 17). Still enough, according to BP, and still way over what's actually been accomplished, but shouldn't seeing those two very different numbers in close proximity to one another at least produced a question or two? And shouldn't BP have been required to explain whether skimmers could be deployed in storm season, and how much they might actually be able to remove in operation, rather than what

Another information gap in the Gulf  $\mid 2$ 

their "derated capacity" was?