Congress of the United States
Washington, DC 20515

August 26, 2025

Mr. Matthew Giacona
Acting Director
Bureau of Ocean Energy Management
1849 C Street, N.W.
Washington, D.C. 20240

Dear Acting Director Giacona,

As Members of Congress committed to protecting the health and safety of our coastal communities, marine ecosystems, and climate, we write to urge the Bureau of Ocean Energy Management (BOEM) to reject BP's proposed Kaskida project in the Gulf of Mexico. This ultra-deepwater project represents an unacceptable threat to Gulf communities, ecosystems, and the climate, and BP's application fails to meet basic regulatory standards required for federal approval.

The Kaskida project is projected to extract 80,000 barrels of oil per day and has the potential to access up to 10 billion barrels over its lifetime, representing a major expansion of high-risk oil production in the Gulf.[1] If approved, this production and associated pollution would compound the already significant public health burdens borne by Gulf communities from oil extraction and refining, while further threatening the Gulf's fragile marine ecosystem.

BP itself estimates that, under a worst-case scenario, the Kaskida project could result in a catastrophic oil spill of up to four million barrels — a disaster on par with, or exceeding, the Deepwater Horizon spill.[2] Kaskida would be located in waters over 1,000 feet deeper than the Deepwater Horizon well, and BP would be operating under far higher pressure and temperature conditions.[3] These extreme conditions make the Kaskida project inherently more dangerous, heightening the likelihood of equipment failure and uncontrolled blowouts.

BP's proposal raises serious concerns about the company's readiness to safely operate this high-pressure, high-temperature (HPHT) project, a category of offshore drilling known for its heightened risks. According to the International Association of Oil and Gas Producers, blowout frequency for a deep HPHT well is seven times higher than for non-HPHT deepwater wells.[4][5] BP has not demonstrated that it has obtained the required HPHT technology qualifications or

[1] BP, BP gives go-ahead for sixth operated hub, Kaskida, in the US Gulf of Mexico (July 30, 2024); see also, French, David and Shadia Nasralla, BP weighs stake sales in two Gulf of Mexico projects, sources say, Reuters (Mar. 26, 2025).
[2] BP, Environmental Impact Analysis, at 19 (PDF page 634 of 749 from BP's Initial Development and Operations Coordination Document for Keathley Canyon Blocks 292 and 293 (Control No. N-10256) ("2025 Kaskida DOCD").
[3] Harvey Consulting, LLC, Technical Review of BP's Kaskida Project (June 26, 2025).
[4] Loss of Well Control Occurrence and Size Estimators, Phase I and II, ExproSoft, prepared for USDOI, BSEE, May 2017, pgs. 15-16.

provided adequate information about the "new or unusual technology" the company intends to deploy.[6] Alarmingly, BP has also failed to show that it possesses the necessary equipment to contain a high-pressure spill. The blowout preventers on the proposed response rigs are not rated for the anticipated pressure, and BP has not confirmed the availability of a capping stack capable of operating in these conditions.[7] These deficiencies alone warrant application denial under BOEM's own regulations.

Additionally, BP's environmental review is outdated and incomplete. It fails to fully assess the air quality impacts and greenhouse gas emissions of the project, neglects to evaluate impacts to several threatened and endangered species, and does not adequately account for how oil pollution would affect Gulf communities.

Most troubling, the company severely underestimates the potential size and duration of a worst-case discharge. BP claims it could stop a blowout in 90 days — yet its own numbers suggest it would take at least 100 days, potentially spilling 4.5 million barrels of oil.[8] This calculation error, combined with the lack of transparency around spill assumptions, fatally undermines confidence in BP's planning and modeling.

Approving Kaskida would not only endanger lives and the Gulf ecosystem — it would also set a dangerous precedent for a new era of ultra-deep, high-risk drilling in the Gulf. The industry is pushing a wave of HPHT projects that rely on experimental technologies in increasingly hostile environments. These are not conventional offshore developments; they are inherently riskier ventures that demand far more rigorous scrutiny, oversight, and public accountability than BP's current application reflects.

Fifteen years after the Deepwater Horizon disaster, we know the cost of safety shortcuts and weak oversight: workers' lives lost, livelihoods destroyed, and ecosystems scarred. BOEM has a duty to ensure that no project moves forward without meeting basic standards of safety, environmental protection, and public transparency. Kaskida falls far short on every front.

We respectfully urge BOEM to reject BP's Kaskida production plan.

Sincerely,

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[5] International Association of Oil & Gas Producers, Risk Assessment Data Directory, Blowout Frequencies, Report No. 434-02, September 2019, PDF Page 11 of 28.

[6] 2025 Kaskida DOCD, PDF page 549 of 749.

[7] *Id*. at PDF page 14 of 749 (stating BP will only have access to a capping stack suitable for high pressures "when it is available" and listing the Black Lion and Black Hornet relief rigs that only have blowout preventers that are rated to 15,000 psi (high pressure equipment must be rated to 20,000 psi)).

[8] BP's proposal states that it will take 3-10 days to mobilize and position a mobile offshore drilling unit to drill a relief well, 60 days from spud to casing shoe above the blowout zone, and 30 days to intersect and kill the well, totaling 90 days. Therefore, the maximum duration is 100 days. A spill of 45,000 barrels of oil per day for 100 days would spill 4.5 million barrels. *See* 2025 Kaskida DOCD, PDF page 634 of 749 (BP, Environmental Impact Analysis, at 19).

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