



January 29, 2018

Katharine S. MacGregor  
Deputy Assistant Secretary  
Department of the Interior  
Bureau of Safety and Environmental Enforcement  
Attention: Regulations Development Branch  
45600 Woodland Road VAE–ORP  
Sterling, VA 20166

Re: Oil and Gas Production Safety Systems—Revisions, 1014–AA37

Dear Deputy Assistant Secretary MacGregor:

On behalf of the American Academy of Family Physicians (AAFP), which represents 129,000 family physicians and medical students across the country, I write in response to the “Oil and Gas and Sulphur Operations on the Outer Continental Shelf—Oil and Gas Production Safety Systems—Revisions” [proposed rule](#)<sup>i</sup> published by the Bureau of Safety and Environmental Enforcement (BSEE) in the December 29, 2017 *Federal Register*.

The AAFP is concerned that these proposed revisions aim to amend needed and important safety regulations regarding oil and natural gas production. We oppose discontinuation of safety regulations enacted to prevent future accidents and harms to humans, wildlife, and the environment. Immediate [health consequences](#)<sup>ii</sup> of accidents related to oil and natural gas production include but are not limited to preventable injuries and death, and exposure to hazardous chemical toxins leading to acute toxicity affecting multiple organ systems. This acute toxicity can lead to chronic, long-term health effects. There are also short and long-term [psychological consequences](#)<sup>iii</sup> associated with accidents related to oil and natural gas production including generalized anxiety disorder, post-traumatic stress disorder and depressive symptoms.

In recognition of the numerous and serious adverse health consequences resulting from pollution, greenhouse emissions from human activities, climate change and ozone layer depletion, the AAFP [policy](#)<sup>iv</sup> on Climate Change and Air Pollution recommends strong action on all public and private levels to limit and correct the pollution of our land, atmosphere and water.

We are concerned that removing the required third-party inspection of devices could cause avoidable accidents, death, short and long-term negative health effects and pollution. We therefore urge BSEE to not revise these proposed changes.

[www.aafp.org](http://www.aafp.org)

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We appreciate the opportunity to provide these comments. Please contact Robert Hall, Director of Government Relations, at 202-232-9033 or [rhallt@aafp.org](mailto:rhallt@aafp.org) with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Meigs, Jr.', with a stylized flourish at the end.

John Meigs, Jr., MD, FAFBP  
Board Chair

### **About Family Medicine**

Family physicians conduct approximately one in five of the total medical office visits in the United States per year – more than any other specialty. Family physicians provide comprehensive, evidence-based, and cost-effective care dedicated to improving the health of patients, families and communities. Family medicine’s cornerstone is an ongoing and personal patient-physician relationship where the family physician serves as the hub of each patient’s integrated care team. More Americans depend on family physicians than on any other medical specialty.

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<sup>i</sup> <https://www.gpo.gov/fdsys/pkg/FR-2017-12-29/pdf/2017-27309.pdf>

<sup>ii</sup> "E Speaker Biographies." Institute of Medicine. 2010. *Assessing the Effects of the Gulf of Mexico Oil Spill on Human Health: A Summary of the June 2010 Workshop*. Washington, DC: The National Academies Press. doi: 10.17226/12949.

<sup>iii</sup> Ibid.

<sup>iv</sup> <https://www.aafp.org/about/policies/all/climate-pollution.html>