

**Testimony of Jacqueline Savitz  
Chief Policy Officer, North America  
Oceana**

**Committee on Natural Resources Subcommittee on Energy and Mineral Resources  
United States House of Representatives  
Remote Oversight Hearing: “Impacts of Abandoned Offshore Oil and Gas Infrastructure and the  
Need for Stronger Federal Oversight.”  
Washington, D.C.**

**October 14, 2021**

Chair Lowenthal, Ranking Member Stauber, and members of the Subcommittee, thank you for the opportunity to testify. My name is Jacqueline Savitz, and I am Chief Policy Officer for North America at Oceana. Oceana is the largest international advocacy organization devoted solely to ocean conservation, with over 1.2 million members and supporters in the United States. Our mission is to protect our oceans and the fish and wildlife that depend on them.

The recent oil spill in California highlights the need to move away from oil and gas and towards clean, renewable energy sources. Dead birds and dead fish have washed ashore, beaches are closed, and the area is closed to fishing. As always, oil disasters hurt our environment and coastal economies. With estimates of up to 132,000 gallons of oil spilled,<sup>1</sup> this spill is just the latest in a long list of tragedies caused by the oil and gas industry. Offshore drilling is a dirty and dangerous business. When they drill, they spill. It's not a matter of if, but when. The contamination along our beaches won't be going away any time soon, but future disasters like this are preventable.

The dangers posed by offshore oil and gas do not end when a lease is no longer active. The failure to safely decommission wells and infrastructure can result in leaks of oil and dangerous gases and can interfere with other uses of the ocean.<sup>2</sup> It's time we end all new offshore oil and gas leasing and take immediate steps towards more robust oversight of pipelines and stronger enforcement of decommissioning responsibilities. Taxpayers and our environment should not provide perverse financial incentives that allow companies to avoid safety and decommissioning responsibilities and, as a result, put our oceans and the livelihoods of millions of Americans at risk.

My testimony today will focus on the need to permanently end offshore drilling, the failures of current financial assurance procedures, and the lack of oversight on active pipelines and decommissioning

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<sup>1</sup> Amy Taxin, *California spill not the environmental disaster first feared*, AP NEWS (Oct. 9, 2021), <https://apnews.com/article/oil-spills-business-california-environment-animals-d78bf32e18f6c2a302daae5d885b92fb>.

<sup>2</sup> Hannah Seo, *Unplugged: Abandoned oil and gas wells leave the ocean floor spewing methane*, ENVIRONMENTAL HEALTH NEWS (Dec. 8, 2020), <https://www.ehn.org/oil-and-gas-wells-methane-oceans-2649126354.html>; U.S. GOV'T ACCOUNTABILITY OFF., GAO-21-293, OFFSHORE OIL AND GAS: UPDATED REGULATIONS NEEDED TO IMPROVE PIPELINE OVERSIGHT AND DECOMMISSIONING 5 (2021).

activities. Oceana has several recommendations that are outlined in this written testimony that fall into three categories.

First, Congress must end all new leasing for oil and gas, and that should start with the Build Back Better Act, which should include language currently in the House's version which would protect substantial areas of the Outer Continental Shelf from leasing consideration.

Second, the Bureau of Ocean Energy Management, or BOEM, should minimize or eliminate the use of the financial strength tests as a waiver to supplemental bonds in its financial assurance procedures, and the Bureau of Safety and Environmental Enforcement, or BSEE, should take steps to improve estimates of decommissioning costs.

Third, Congress should pass H.R. 2643, which would direct BSEE to finalize regulations that have been delayed since 2007 to increase oversight on active pipelines, and BSEE must amend its procedures to implement meaningful oversight over pipeline decommissioning and to not rely on decommissioning-in-place as a standard practice.

### **The Need to Permanently End Offshore Drilling**

In January, Oceana [released an analysis](#) detailing the economic benefits of banning all new offshore drilling. We found that ending new offshore oil and gas leasing could prevent 19 billion tons of greenhouse gas emissions and more than \$720 billion in damages to people, property, and the environment. Ending new leasing will also safeguard the clean coast economy, which collectively supports around 3.3 million American jobs and \$250 billion in GDP through activities like tourism, recreation, and fishing.

Congress needs to take action to stop all new offshore leasing. The Biden administration can exclude planning areas from the next Five-Year Program under the Outer Continental Shelf Lands Act, but until Congress takes action, our oceans will not be safe from new offshore oil and gas leasing. Congress has a great opportunity to take concrete steps towards ending all new leasing with the Build Back Better Act, which in the House includes language that would permanently remove the Eastern Gulf of Mexico, Pacific, and Atlantic Planning Areas from leasing consideration.

Even if we stop all new leasing, we will continue living with the dangerous relics of the fossil fuel age. The oil and gas industry is sitting on nearly 8.5 million acres of unused or non-producing leases, or 75% of the total leased acreage in public waters.<sup>3</sup> These leases may still be developed in the future, so until they expire, we need to ensure that there is proper oversight from the federal government on the operation of drilling and pipelines and ensuring that taxpayers don't suffer from the industry's negligence.

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<sup>3</sup> BUREAU OF OCEAN ENERGY MANAGEMENT, *Combined Leasing Report* (Oct. 1, 2021), <https://www.boem.gov/regions/pacific-ocs-region/oil-gas/lease-stats-10-1-21>.

## Failures of Current Financial Assurance Procedures

The Department of Interior has failed to hold the oil and gas industry accountable for their obligations to decommission offshore oil and gas infrastructure, in part because current financial assurance procedures allow companies to avoid providing bonds that would sufficiently assure funds are available for decommissioning. Existing policies do not protect taxpayers or our oceans from the costs of abandoned infrastructure. Reforms to financial assurance procedures are necessary for current leases, but until we stop new leasing, history suggests that oil and gas companies will not fully protect taxpayers from the dangers of pipelines and other defunct infrastructure.

Within the Department of the Interior, BOEM has been delegated authority over offshore energy development, including preparation of the 5-Year Leasing Program under the Outer Continental Shelf Lands Act and review of oil and gas exploration and development plans. BSEE has been delegated authority over the operations of offshore energy activities and environmental compliance, including decommissioning activities. Under this structure, BOEM is responsible for ensuring that lessees provide sufficient financial assurances that they can comply with the terms of their lease, including provisions related to decommissioning, and BSEE oversees the carrying out of decommissioning activities.

BSEE regulations require that offshore oil and gas lessees decommission infrastructure on their leases when the facilities are no longer useful for operations.<sup>4</sup> This includes plugging wells, removing platforms, deactivating pipelines, and clearing the seafloor of obstructions.<sup>5</sup> BOEM regulations require lessees to furnish bonds to ensure funds are available to cover decommissioning costs, but those bonds are insufficient to cover all decommissioning costs which can sometimes amount to hundreds of millions of dollars.<sup>6</sup> BOEM has the discretion to require supplemental bonds which would reduce the risk to taxpayers, but has relied heavily on faulty financial strength tests to waive those supplemental bonds for lessees.

The bonds that BOEM regulations require lessees to furnish have not increased since 1993, but offshore oil and gas development has dramatically changed since then. A huge concern is that drilling is constantly moving into deeper areas of the ocean, and as the water depth of wells and structures increases, so does the cost to decommission.<sup>7</sup> In 1993, only about 10 percent of offshore oil production in the Gulf of Mexico was from deepwater wells.<sup>8</sup> Deepwater wells are wells drilled in waters deeper than 400 feet.<sup>9</sup> In 2014, however, the production from deepwater wells in the Gulf rose to 80 percent.<sup>10</sup> And deepwater

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<sup>4</sup> 30 C.F.R. § 250.1703.

<sup>5</sup> *Id.*

<sup>6</sup> 30 C.F.R. § 556.901; U.S. GOV'T ACCOUNTABILITY OFF., GAO-17-642, OFFSHORE OIL AND GAS RESOURCES: INFORMATION ON INFRASTRUCTURE DECOMMISSIONING AND FEDERAL FINANCIAL RISK 2 (2017).

<sup>7</sup> GAO-17-642, *supra* note 3, at 19.

<sup>8</sup> *Id.* at 9-10.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

production is getting deeper with 52 percent of Gulf of Mexico oil production coming from ultra-deep waters, with depths of 5000 feet or greater, while there was no ultra-deep water production in the 1990s.<sup>11</sup>

Beyond the required bonds, BOEM regulations allow the agency to require additional financial assurances, but BOEM may waive the additional financial requirements if it determines that a company has the financial strength to carry out decommissioning obligations.<sup>12</sup>

A 2015 report from the Government Accountability Office, or GAO, identified two areas of concern with financial assurance procedures. First, data limitations prevent BOEM and BSEE from estimating decommissioning costs and tracking decommissioning liabilities. Second, BOEM's procedures for obtaining financial assurances created significant financial risk.

On the concern of data limitations, as drilling moves to deeper waters, making decommissioning more expensive, it is becoming increasingly worrisome that the Department of the Interior's data underlying the financial assurances is limited and sometimes outdated. BSEE calculates decommissioning costs using data on the quantity and types of wells and other infrastructure on a lease and data on the water depth at which it was installed or drilled.<sup>13</sup> Because limitations with the TIMS data system were resulting in decommissioning costs being underestimated, the GAO reported that BSEE had resorted to manually updating decommissioning cost estimates for Gulf leases.<sup>14</sup>

Since 2015, BSEE has taken steps to more accurately estimate decommissioning costs, but these actions have not led to substantial improvements. First, BSEE issued regulations requiring lessees to report on the actual cost of decommissioning leases, but in a 2021 report, the GAO noted that there are inconsistencies in the details reported across operators, making the data difficult to use.<sup>15</sup> Specific to pipelines, the report found that because most pipelines are decommissioned in place rather than removed, the data is limited on the costs of pipeline removal, which is the default requirement under BSEE regulations. Also, the cost estimates reported for pipelines so far have covered mostly shallow water decommissioning, but over 28 percent of pipelines that will require future decommissioning are in deep water, making BSEE's cost estimates inaccurate and provide little help to BOEM in accurately obtaining financial assurances from operators.

The second step BSEE has taken towards more accurate estimations is transitioning to a new data system. BSEE, however, could not provide the GAO with information on how the limitations in the TIMS system would be improved, and there is no public information on whether the new data system has been implemented nearly 6 years later.

On the shortfalls of BOEM's financial assurance procedures, the 2015 GAO report found that as of October 2015, less than 8 percent of decommissioning liabilities for Gulf oil and gas were backed by bonds or other financial assurance mechanisms, with the remainder covered by financial strength tests or

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<sup>11</sup> Steven A. Murawski et al., *Deepwater Oil and Gas Production in the Gulf of Mexico and Related Global Trends*, in SCENARIOS AND RESPONSES TO FUTURE DEEP OIL SPILLS 16 (2020).

<sup>12</sup> 30 C.F.R. § 556.901.

<sup>13</sup> GAO 16-40 at 18.

<sup>14</sup> *Id.* at 20.

<sup>15</sup> GAO-21-293, *supra* note 1, at 26.

simply unaccounted for.<sup>16</sup> BOEM acknowledged to the GAO that they could not determine the validity of financial assurances for nearly \$2.3 billion in decommissioning liabilities based on inaccurate data and issues with their data system, known as TIMS.

The report expressed concern that BOEM's use of the financial strength test to cover \$33 billion in decommissioning liabilities is a financial risk to the federal government.<sup>17</sup> A company's financial status can deteriorate quickly. Although companies that no longer meet the financial strength test must provide additional financial assurances to BOEM, once their financial situation has deteriorated, they may no longer be able to afford surety bonds or other assurances. The report also noted that BOEM's use of net worth in financial strength test does not provide an accurate indication of the ability to cover decommissioning costs because net worth can be skewed by volatile commodity prices and other factors.<sup>18</sup>

BSEE acknowledged in its FY 2021 and 2022 budget justifications that bankruptcies are a growing concern.<sup>19</sup> BSEE said that operators have been declaring bankruptcy at an increased rate, which leaves the federal government and American taxpayers to cover decommissioning costs where bonds were not furnished.<sup>20</sup> Despite growing risk to the government from these bankruptcies, BOEM continues to rely on the financial strength test.

Following the 2015 GAO report, BOEM published a Notice to Lessees which modified the financial strength test and required additional security, including surety bonds, for sole liability lessees.<sup>21</sup> Although it was focused on reforming the financial strength test, the Notice to Lessees would have reduced the risk to the federal government by shifting away from financial strength estimates. Unfortunately, it was rescinded after issuance of Executive Order 13,795 by President Trump.<sup>22</sup> BOEM should immediately reissue the Notice to Lessees as an interim step while it considers stronger measures to reduce financial risk for the federal government.

After taking this interim step, BOEM needs to minimize or eliminate its reliance on the financial strength test. BOEM should develop other practices to ensure sufficient supplemental bonding. Meanwhile, BSEE needs to improve its data collection procedures in line with the recommendations from the 2015 GAO report.

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<sup>16</sup> U.S. GOV'T ACCOUNTABILITY OFF., GAO 16-40, OFFSHORE OIL AND GAS RESOURCES: ACTIONS NEEDED TO BETTER PROTECT AGAINST BILLIONS OF DOLLARS IN FEDERAL EXPOSURE TO DECOMMISSIONING LIABILITIES 24 (2015).

<sup>17</sup> *Id.*

<sup>18</sup> *Id.* at 27-28.

<sup>19</sup> BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT, BUDGET JUSTIFICATIONS AND PERFORMANCE INFORMATION FISCAL YEAR 2021 13 (2020); BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT, BUDGET JUSTIFICATIONS AND PERFORMANCE INFORMATION FISCAL YEAR 2022 12-13 (2021).

<sup>20</sup> *Id.*

<sup>21</sup> BUREAU OF OCEAN ENERGY MANAGEMENT, NTL No. 2016-N01 (Sept. 12, 2016)

<sup>22</sup> *BOEM Withdraws Sole Liability Orders: Further Review of Complex Financial Assurance Issues Warranted*, BUREAU OF OCEAN ENERGY MANAGEMENT (Feb. 17, 2017), <https://www.boem.gov/newsroom/notes-stakeholders/boem-withdraws-sole-liability-orders>.

Without these reforms, we will continue to see more abandoned infrastructure that pose significant environmental, economic, and human health concerns.

### **Lack of Oversight on Active Pipelines and Decommissioning Activities**

BSEE's lax approach to overseeing the safety of active pipelines has led to the fox guarding the henhouse, with no meaningful processes for ensuring that pipelines are operated safely, leading to catastrophic results like the recent oil spill off southern California. When it comes to decommissioning pipelines, BSEE has rubber stamped requests to decommission-in-place, leading to nearly 18,000 miles of inactive pipelines littering the seafloor of the Gulf of Mexico alone.

#### *Active Pipelines*

The GAO's 2021 report found that BSEE oversight of active pipelines is inadequate for ensuring their safety.<sup>23</sup> BSEE relies mostly on surface observation and pressure sensor testing, but these approaches are not reliable in detecting leaks.<sup>24</sup> BSEE allows regional offices to set their own inspection policies, and for the Gulf of Mexico, this has meant relying on operators to conduct monthly surface observation inspections of approximately 8,600 miles of pipeline.<sup>25</sup> Surface observation is inadequate because the visual signs of leaks may not surface for smaller leaks and may be moved by currents far from the pipeline routes, particularly for deepwater pipelines.<sup>26</sup>

BSEE continues to allow high-risk behavior from oil companies without the technology to adequately monitor leaks. BSEE has not taken steps to improve monitoring technology, saying that current regulations do allow the agency to compel use of new technologies that are not yet the industry standard.<sup>27</sup> Although one-third of operators in the Gulf of Mexico have installed newer leak detection technology, older pipelines cannot be retrofitted, yet oil and gas companies continue to be permitted to add new wells to old pipelines, despite the risks faced by older pipelines.<sup>28</sup>

To make matters worse, even the leak detection technologies that the oil and gas industry touts as safer, have not been proven to prevent major leaks. The 2021 GAO report indicated that all pipelines in the Pacific Region are equipped with the advanced leak detection technologies.<sup>29</sup> Unfortunately, two weeks ago, we saw exactly what can happen even with these technologies in place. Beta Offshore, the company operating the pipeline off the coast of Huntington Beach, received a low-pressure alarm for the pipeline,

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<sup>23</sup> GAO-21-293, *supra* note 1, at 5.

<sup>24</sup> *Id.* at 8.

<sup>25</sup> *Id.* at 6.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.* at 8.

<sup>28</sup> *Id.* at 9-10.

<sup>29</sup> *Id.* at 9, n. 10.

which would indicate a possible failure, at around 5:30 PM Eastern.<sup>30</sup> But the pipeline was not shut down until 9:01 PM, and the leak was not reported to the government until 12:07 AM, more than six hours after the initial alarm.<sup>31</sup>

With BSEE's limited oversight capacity and the industry's substantial economic incentives to prioritize production over safety, it is no surprise that human error in the operation of leak detection equipment continues to be an issue.

A proposed rule from 2007, which would have implemented new pipeline inspection and leak detection technology requirements, has not been finalized despite years of including plans to update the regulations in BSEE's budget justifications.<sup>32</sup> Last week's oil spill in California makes clear that our coastal economies and [human health](#) cannot continue to suffer at the expense of BSEE's delays and the oil and gas industry's indifference. Pipeline oversight must be made a priority by both BSEE and Congress. Congress must pass H.R. 2643 to force BSEE's hand after nearly 15 years of delay at the agency.

### *Decommissioning*

In its 2021 report, the GAO also analyzed BSEE's actions on pipeline decommissioning. The GAO found that BSEE approved almost 96 percent of requests to decommission pipelines in place from 2015 to 2020.<sup>33</sup> Of the 813 segments for which industry requested decommissioning in place, BSEE only rejected 18, leaving nearly 18,000 miles of decommissioned pipelines in place, obstructing other uses of the Outer Continental Shelf and posing risks to ocean ecosystems.<sup>34</sup>

The GAO found that BSEE's review of decommissioning-in-place applications does not fully account for environmental and safety risks.<sup>35</sup> BSEE has stated that the decommissioned pipelines do not pose a threat to navigation but has not made a similar finding for commercial fishing.<sup>36</sup> In fact, the GAO report noted that between 2015 and 2019, 89 trawlers damaged their ships or equipment because of interactions with oil and gas infrastructure, mostly pipelines.<sup>37</sup>

Abandoned infrastructure also gets in the way of coastal restoration.<sup>38</sup> Louisiana's work to rebuild lost coastal land requires moving sand to build new wetlands and barrier islands, but about 80 percent of the

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<sup>30</sup> U.S. DEPARTMENT OF TRANSPORTATION: PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION, CORRECTIVE ACTION ORDER: CPF NO. 5-2021-054-CAO (Oct. 4, 2021), <https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/2021-10/Beta%20Offshore%20CAO.10.04.2021.pdf?source=email>.

<sup>31</sup> *Id.*

<sup>32</sup> Oil and Gas and Sulphur Operations in the Outer Continental Shelf-Pipelines and Pipeline Rights-of-Way, 72 Fed. Reg. 56,441 (Oct. 3, 2007).

<sup>33</sup> GAO-21-293, *supra* note 1, at 13.

<sup>34</sup> *Id.* at n. 26.

<sup>35</sup> *Id.* at 12.

<sup>36</sup> *Id.* at 14.

<sup>37</sup> *Id.*

<sup>38</sup> Sara Sneath, *Louisiana needs sand to rebuild its coast. Old oil and gas pipelines are blocking the way.*, THE WASHINGTON POST (Aug. 5, 2021), <https://www.washingtonpost.com/climate-environment/2021/08/05/louisiana-gulf-abandoned-pipelines/>.

sediment in the Gulf of Mexico that could be used to rebuild Louisiana's coast is blocked by oil and gas infrastructure.<sup>39</sup> The useless, abandoned infrastructure makes restoration projects more difficult and costly.

Beyond allowing the oil and gas industry a free pass on the default requirement to remove pipelines, BSEE also does not have adequate oversight of the cleaning of pipelines decommissioned-in-place. BSEE does not conduct oversight over decommissioning activities underway and does not inspect decommissioned pipelines after the decommissioning, so BSEE cannot ensure that industry has complied with required environmental mitigations and even when it is incidentally made aware of compliance issues, does not take sufficient action.<sup>40</sup> For pipelines that were not buried as required, BSEE relies on NOAA to identify when decommissioned pipelines are exposed, and between June 2018 and June 2019, NOAA found eight exposed pipeline segments.<sup>41</sup>

The problems with abandoned infrastructure will only intensify as it gets older and becomes more vulnerable. As oil and gas infrastructure ages, it is more susceptible to damage from corrosion, mudslides, and seafloor erosion, which can result in leakage of oil and gas into the ocean.<sup>42</sup> Over 44 percent of active pipelines in the Gulf were installed prior to 2000.<sup>43</sup>

When pipelines that were decommissioned-in-place later need to be removed, it is difficult to get compliance from operators because they may be bankrupt or unreachable, passing the cost on to the federal government.<sup>44</sup> In 2004, BSEE estimated that removal of all existing pipelines would cost over \$21.5 billion. At the time, pipelines were almost all in shallow water. Since the study, nearly 8500 miles of pipeline have been installed, with about two-thirds in deep water, making the removal more expensive,<sup>45</sup> but BSEE has not attempted to calculate the cost of pipeline removal since that study.

BSEE and Congress need to take action to decrease reliance on decommissioning-in-place and improve oversight over the decommissioning process.

## Conclusion and Recommendations

The world needs to move away from its reliance on fossil fuels, and the United States should be leading by example. Congress should start by passing the Build Back Better Act, including the House's provisions to permanently ban new oil and gas leasing in the Atlantic Ocean, Pacific Ocean, and Eastern Gulf of Mexico. And we need to build on these provisions to protect our coastal economies and environment from new offshore oil and gas leasing in all areas. Unfortunately, ending new leasing does not fully solve the problem of drilling on current leases, so BOEM and BSEE need to take stronger action to ensure that oil and gas operations are conducted as safely as possible and avoid financial risk to the

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<sup>39</sup> GAO-21-293, *supra* note 1, at 16.

<sup>40</sup> *Id.* at 18-20.

<sup>41</sup> *Id.* at 20.

<sup>42</sup> *Id.* at 10.

<sup>43</sup> *Id.*

<sup>44</sup> *Id.* at 22.

<sup>45</sup> *Id.*



federal government and U.S. taxpayers. We know that as safely as possible will never be fully safe which is why we cannot repeat the mistakes of our past. In some areas, like the Pacific, we are living with decisions made decades ago – but Congress must do better and prevent any further leasing for new offshore drilling.

The oil and gas industry has been allowed to skirt financial assurance and decommissioning obligations through BOEM and BSEE's inaction and oversight failures. BOEM and BSEE have relied heavily on exceptions to the rules, and the oil and gas industry has flourished at the expense of taxpayers and has caused massive losses to coastal economies and destruction of the environment. It's past time that the oil and gas industry is held accountable, and that starts with ensuring that the federal government is not left to cover the costs of decommissioning and conducting proper oversight over decommissioning.

BOEM must reissue its 2016 Notice to Lessees immediately to reduce the risk of its reliance on the financial strength test. Regulations must also be updated to require more supplemental bonding to ensure that the federal government is not left to pick up the tab of future decommissioning. These regulations should minimize or eliminate the use of the financial strength tests as a waiver to supplemental bonds.

Additionally, BOEM and BSEE need to improve data collection practices in line with the GAO's recommendations, so that they can fully understand the level of decommissioning liabilities that face offshore oil and gas. While improving data collection practices, the agencies should make their public facing data more accessible to the general public.

As it relates to active pipelines, Congress should immediately work towards passage of H.R. 2643 which would require BSEE to finalize regulations proposed in 2007 that would increase oversight over pipelines. BSEE must also take immediate action to rely less on decommissioning-in-place and actually conduct oversight over decommissioning of pipelines.

These solutions are forward looking, and in the meantime, abandoned infrastructure poses a risk to the environment and to coastal economies. Where it is no longer possible to hold oil and gas companies accountable for the abandoned infrastructure, the federal government needs to make a concerted effort to plug wells and remove other abandoned infrastructure, like pipelines. This is an opportunity to do good for the environment while creating good-paying jobs.

Congress must immediately end new leasing, work toward requiring stronger financial assurances, end the practice of permitting abandoned pipelines, conduct strong oversight over active pipelines, and require Agencies to take a proactive management approach to properly decommission historically abandoned infrastructure – this would be a win for the environment, coastal economies, and U.S. taxpayers.