



United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

Director's Order
September 27, 2024

Mr. Klaus Moeller, Ms. Geri Edens
Vineyard Wind 1 LLC
75 Arlington Street, 7th Floor
Boston, MA 02116

Dear Mr. Moeller and Ms. Edens,

On July 15, 2024, the Bureau of Safety and Environmental Enforcement issued a suspension order pursuant to 30 C.F.R. § 285.417(a)(2) to Vineyard Wind 1 LLC (Vineyard Wind 1) for lease OCS-A 0501 due to the blade failure of Wind Turbine Generator AW-38 on July 13, 2024. A suspension pursuant to § 285.417(a)(2) remains in effect, and BSEE understands that you may wish to resume activities on this lease. BSEE now orders you, pursuant to 30 C.F.R. §§ 285.417(b), 285.105, and 285.400, to conduct a site-specific study that evaluates the environmental harm and other potential damage flowing from the above-referenced failure and the potential mitigation measures for that damage. To comply with this order, BSEE requires you to meet the following conditions:

1. Submit a plan by October 11, 2024, for a site-specific study that evaluates the environmental harm and other damage from the blade failure for BSEE's review and approval; and
2. Complete the site-specific study consistent with the plan, as that plan is approved by BSEE.

The study should characterize the subsea debris field resulting from the blade failure and the potential impacts or damage to onshore, coastal, and offshore resources from the blade debris. The study plan must include (at a minimum):

1. Clearly stated, specific objectives for the study and a technically sound basis for the timing, location, and frequency of all proposed sampling activities included in the study.
2. A detailed sampling plan, including methods, media, biota to sample, sample numbers, data analysis plans, quality assurance and quality control, potential indicator compounds, etc. This sampling plan must also include the environmental sampling Vineyard Wind 1 is undertaking in response to requests from the Commonwealth of Massachusetts and the Town of Nantucket.
3. A characterization of the subsea marine debris field that clearly identifies the location and the amount of debris on the seafloor and in coastal areas where debris was retrieved.



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4. The mass balance of unrecovered debris material based on the weight of debris recovered to date and the weight of the subsea debris once retrieved.
5. A communication plan for providing BSEE updates on the status of the study.
6. The format of the results from the study.
7. The timeline for submission of the study to BSEE.

BSEE is responsible under 30 CFR 285.102 for ensuring that all authorized activities are carried out in a manner that provides for safety and protection of the environment, among other requirements. BSEE is requiring you to conduct this study pursuant to 30 C.F.R. §§ 285.417(b), 285.105, and 285.400. This order is separate and distinct from the Suspension Order issued to Vineyard Wind 1. Activities on the lease may resume according to the terms of the Suspension Order and prior to completion of the site-specific study. BSEE may use the results of this study to determine if Vineyard Wind 1 must take any actions to mitigate or avoid damage to natural resources; life; property; the marine, coastal, and human environment; or sites, structures, or objects of historical or archaeological significance. BSEE may make all results of the study available to the public.

You are responsible for complying with all applicable laws and regulations, the terms and conditions of your lease or grant, and any terms or conditions of reports, notices, and approved plans. *See* 30 CFR 285.105(d). You are also required to “respond to requests from the Director in a timely manner.” *Id.* §105(j). BSEE may take appropriate corrective action if you fail to comply with this Order of the Director. *Id.* §§ 285.400.

Appeal Rights

Pursuant to 30 CFR 285.118, you may appeal this Order. If you elect to appeal under 30 CFR 290.4, a Notice of Appeal must be filed with this office and served on the Associate Solicitor, Division of Mineral Resources, within 60 days of receipt of this letter (see 43 CFR 4.413). If you file an appeal, please send a courtesy copy of the Notice of Appeal via e-mail to the contact e-mail address provided below. During the 60-day appeal period, you may request informal resolution with the issuing officer’s next level supervisor pursuant to 30 CFR 290.6. You may submit an informal resolution request through the BSEE Technical Information Management System Web Portal (<https://timsweb.bsee.gov>). If you are adversely affected by the outcome of informal resolution, you will have 60 days from receipt of that decision to appeal pursuant to 30 CFR 290.4.

If you have any questions, please contact Tamara Arzt at (860) 754-4267, or by email at Tamara.Arzt@bsee.gov.



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Sincerely,

**KATHRYN
KOVACS**

Digitally signed by KATHRYN
KOVACS
Date: 2024.09.27 08:54:30 -04'00'

Kathryn E. Kovacs

Deputy Assistant Secretary, Land and Minerals
Management

Exercising the Delegated Authorities of the
Director, Bureau of Safety
and Environmental Enforcement