

In Reply Refer To: FO-2-1

November 1, 1989

Felto Oil Company
Attention: Mr. Jeffrey R. Hughes
One Allen Center, Suite 1800
500 Dallas Street
Houston, Texas 77002

Gentlemen:

Reference is made to your Supplemental Development Operations Coordination Document (DOCD) and accompanying information received October 18, 1989, for Lease OCS-C 5717, Block 200, Main Pass Area. This DOCD includes the activities proposed for Well A-5.

In accordance with 30 CFR 250.34, this DOCD is hereby deemed submitted and is now being considered for approval.

Your control number is S-2384 and should be referenced in your communication and correspondence concerning this DOCD.

Sincerely,

(Orig. Sgd.) A. Donald Giroir

D. J. Courgeois
Regional Supervisor
Field Operations

cc: Lease OCS-C 5717 (OPS-3-2) (FILE ROOM)
OPS-3-4 w/Public info. Copy of the DOCD
and accomp. info. (PUBLIC RECORDS)

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Program Services

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Information Services
Section

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October 16, 1989

Mr. Daniel J. Bourgeois
Regional Supervisor
Office of Field Operations
U.S. Department of the Interior
Minerals Management Service
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

RE: Supplemental Development Operations Coordination Document
OCS-G 5717, Main Pass Area Block 209, Offshore Louisiana

Gentlemen:

In accordance with the provisions of Title 30 CFR 250.34, Pelto Oil Company (Pelto) hereby submits for your review and approval nine (9) copies of a Supplemental Development Operations Coordination Document (DOCD) for Lease OCS-G 5717, Main Pass Area Block 209, Offshore, Louisiana. Five (5) copies are "Proprietary Information" and four (4) copies are "Public Information".

Excluded from the Public Information copies are certain geologic discussions, depth of wells and structure map.

Pelto anticipates commencing activities under this proposed Supplemental Development Operations Coordination Document on or before November 15, 1989.

Should additional information be required, please contact our regulatory agent, Connie J. Goers, J. Connor Consulting at (713) 558-0607.

Sincerely,

PELTO OIL COMPANY

Jeffrey R. Hughes
Drilling Superintendent

JRH:CJG
Enclosures

"Public Information"

PELTO OIL COMPANY

SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

MAIN PASS AREA BLOCK 209

OCS-G 5717

Pelto Oil Company (Pelto), as designated Operator of the subject lease, submits this proposed Supplemental Development Operations Coordination Document (DOCD) in accordance with the regulations contained in Title 30 CFR 250.34 and more specifically defined in the Minerals Management Service Letter to Lessee's and Operators dated October 12, 1988 and September 5, 1989.

BRIEF HISTORY TO DATE

Under the Initial Development Operations Coordination Document, Pelto installed Production Platform "A" and a right-of-way pipeline to transport produced hydrocarbons to Main Pass Block 202.

This lease is being maintained past the primary term ending date by production operations from four (4) platform wells.

DESCRIPTION OF DEVELOPMENT ACTIVITIES

A total of one (1) well will be involved in the supplemental development of this lease. A Well Location Plat detailing the existing well locations, and a Well Location Table of the proposed well are included as Attachments A.

Pelto will drill and produce the additional well from its existing Production Platform "A" and right-of-way pipeline.

Activities proposed under this Supplemental DOCD for Main Pass Block 209 will commence in November, 1989 with commencement of drilling operations.

<u>Activity</u>	<u>Approximate Start-Up Date</u>
1. Drill & Complete Well A-5	November, 1989
2. Hook Up & Commence Production	December, 1989

DESCRIPTION OF DRILLING UNIT

The proposed well will be drilled with a typical jack-up drilling unit. When a rig is selected, the rig specifications will be made a part of the Application for Permit to Drill. Typical Diverter and BOP Schematics are included as Attachment B.

Safety features will include well control and blowout prevention equipment as described in Title 30 CFR 250.50. The appropriate life rafts, life raft, life jackets, ring buoys, etc., as prescribed by the U. S. Coast Guard will be maintained on the facility at all times.

DESCRIPTION OF PLATFORM

Pelto will drill the additional well from existing Production Platform "A" addressed in the Initial DOCD.

There shall be no disposal of equipment, cables, containers, or other materials into offshore waters.

STRUCTURE MAP

A current structure map of the productive formation is included as Attachment C.

The estimated life of reserves for Main Pass Block 209 is
Expected production from this lease is

BATHYMETRY MAP

A bathymetry map depicting the surface location of existing Production Platform "A" was included in the Initial DOCD.

SHALLOW HAZARDS

An analysis of any seafloor and subsurface geologic and manmade features and conditions which may have an adverse effect on the proposed operations was included in the Initial DOCD.

OIL SPILL CONTINGENCY PLAN

All construction and production operations shall be performed in accordance with industry standards to prevent pollution of the environment. Pelto Oil Company's Oil Spill Contingency Plan has been approved by the MMS. This plan designates an Oil Spill Team consisting of Pelto's personnel and contract personnel. This team's duties are to eliminate the source of any spill, remove all sources of possible ignition, deploy the most reliable means of available transportation to monitor the movement of a slick, and contain and remove the slick if possible.

Pelto is a member of Clean Gulf Associates (CGA). The CGA stores pollution control equipment at two locations in Texas, at Rockport and Galveston, and five locations in Louisiana, at Venice, Grand Isle, Intracoastal City, Houma and Cameron. Each base is equipped with fast response skimmers and there is a barge mounted high volume open sea skimmer based at Grand Isle, Louisiana. In addition to providing equipment, the CGA also supplies advisors for

clean-up operations. Equipment available from CGA and the base it is located at is listed in the CGA Manual, Volume I, Section III.

Estimated response time for a spill in Main Pass Block 209 could vary from 8 to 10 hours minimum based on:

	<u>Hours</u>
1. Procure a boat and deploy to nearest CGA Base in Venice, LA	2.0
2. Load out Fast Response Unit and oil spill containment equipment	2.0
3. Travel time to spill site	<u>4.0</u>
Estimated Total Time	8.0

Equipment located in Venice, Louisiana would be utilized first with additional equipment transported from the nearest equipment base on-site as required.

In the event a spill occurs from Main Pass Block 209, our company has projected trajectory of a spill utilizing information in the Environmental Impact Statement (EIS) for OCS Lease Sales 123 and 125.

The EIS contains oil spill trajectory simulations using seasonal surface currents coupled with wind data, adjusted every 3 hours for 30 days or until a target is contacted.

Hypothetical spill trajectories were simulated for each of the potential launch sites across the entire Gulf. These simulations presume 500 spills occurring in each of the four seasons of the year. The results in the EIS were presented as probabilities that an oil spill beginning from a particular launch site would contact a certain land segment within 3, 10, or 30 days. Utilizing the summary of the trajectory analysis (for 10 days) as presented on pages IV-36 through IV-39, the probable projected land fall of an oil spill is as follows. Also listed is the CGA Map Number corresponding to the land segment which will be utilized to determine environmentally sensitive areas that may be affected by a spill.

<u>AREA</u>	<u>LAND SEGMENT CONTACT</u>	<u>%</u>	<u>CGA MAP NUMBER</u>
Main Pass 209	Plaquemines Parish, LA	18%	LA Maps No. 6 & 7
	St. Bernard Parish, LA etal	7%	LA Maps No. 7 & 8
	Hancock County, MS etal	3%	MAFLA Map No. 9
	Mobile County, AL	1%	MAFLA Map No. 9

Section V, Volume II of the CGA Manual containing maps as listed above, also includes equipment containment/cleanup protection response modes for the sensitive areas.

Section VI, Volume II of the CGA Operations Manual depicts the protection response modes that are applicable for oil spill clean-up operations. Each response mode is schematically represented to show optimum deployment and

operation of the equipment in areas of environmental concern. Implementation of the suggested procedures assures the most effective use of the equipment and will result in reduced adverse impact of oil spills on the environment. Supervisory personnel have the option to modify the deployment and operation of equipment to more effectively respond to site-specific circumstances.

NEW OR UNUSUAL TECHNOLOGY

No new techniques or unusual technology will be required for this operation.

LEASE STIPULATIONS

In accordance with Lease Stipulation No. 1 is attached to this lease; a Archaeological Study assessing the potential existence of any cultural resources in Main Pass Block 209 was conducted and previously submitted with the Initial DOCD.

DISCHARGES

All discharges associated with the drilling and production of the proposed well will be in accordance with the permit plimitations addressed in the Environmental Protection Agency NPDES General Permit GMG 280000 for the Gulf of Mexico.

Discharges will be free of oil and will be in compliance with and monitored as required by the permit. Any drilling fluid contaminated with oil will be transported to shore for proper disposal at an authorized disposal site.

Solid domestic waste will be transported to shore for proper disposal at an authorized sewage site, and sewage will be treated on location.

Mud may be discharged for purposes of dilution or at end of well. Surveillance of the fluid is accomplished through daily inventory of mud and chemicals added to the system; in addition to monthly and end-of-well LC50 toxicity tested required by the permit. Typical mud components which may be used in the drilling of the proposed well is included as Attachment D.

The anticipated discharge quantity and rates of drill cuttings for Pelto Oil Company's proposed supplemental operations in Main Pass Block 209 is included as Attachment E.

HYDROGEN SULFIDE

Pelto recommenced the area to be classified as a zone where the absence of hydrogen sulfide has been confirmed. This determination is based on the drilling and production data obtained from the following wells.

OCS-G 5717, Well No. 2 (Well A-1)
OCS-G 5717, Well No. 3 (Well A-2)
OCS-G 5717, Well No. 4 (Well A-3)

Therefore, in accordance with Title 30 CFR 250.67, Pelto Oil Company hereby requests that a determination be made by the MMS that the proposed zone is in an area where the absence of hydrogen sulfide has been confirmed.

PROJECTED EMISSIONS

Projected Air Quality Emissions is included as Attachment F.

ONSHORE SUPPORT BASE

Main Pass Block 209 is located approximately 40 miles east of Venice, Louisiana, in a water depth of approximately 175 feet. A map showing the location of Block 209 relative to the shoreline and onshore base was included in the Initial DOCD.

Pelto will continue to utilize existing onshore facilities located in Venice, Louisiana. This will serve as port of debarkation for supplies and crews. No onshore expansion or construction is anticipated with respect to this activity.

This base is capable of providing the services necessary for the proposed activities. It has 24-hour service, a radio tower with a phone patch, dock space, equipment and supply storage base, drinking and drill water, etc. During drilling activities it is estimated a crew boat and a supply boat will each make seven trips per week. During production activities one supply boat and one crew boat will each make one trip per week and one helicopter making seven trips per week.

The onshore activities associated with Main Pass Block 209 should not result in any increase in the size and number of onshore support and storage facilities or land and personnel requirements.

AUTHORIZED REPRESENTATIVE

Inquiries may be made to the following authorized representative of Peltco Oil Company.

Ms. Connie J. Goers
Regulatory Coordinator
J. Connor Consulting
P. O. Box 218753
Houston, TX 77218
(713) 558-0607

LIST OF ATTACHMENTS

- A Well Location Table and Plat
- B Typical Diverter & BOP Schematic
- C Structure Map
- D Typical Mud Components
- E Quantities & Rates of Discharges
- F Projected Air Emissions

MAIN PASS BLOCK 209

WELL LOCATION TABLE

<u>WELL</u>	<u>LOCATION</u>	<u>TOTAL DEPTH</u>	<u>DAYS TO DRILL/COMPLETE</u>
A-1	SL: 3277' FNL & 4905' FWL BHL:		N/A
A-2	SL: 3279' FNL & 4898' FWL BHL:		N/A
A-3	SL: 3286' FNL & 4900' FWL BHL:		N/A
A-4	SL: 3284' FNL & 4907' FWL BHL:		N/A
A-5	SL: 3278' FNL & 4912' FWL PBHL:		21

ATTACHMENT A

PELTO
OCS-G-5717

209

3278'

4912'



"A" Platform Surface Loc'n
Wells A-1, A-2, A-3 and A-4
Proposed Well A-5

PUBLIC INFORMATION

ATTACHMENT A-1

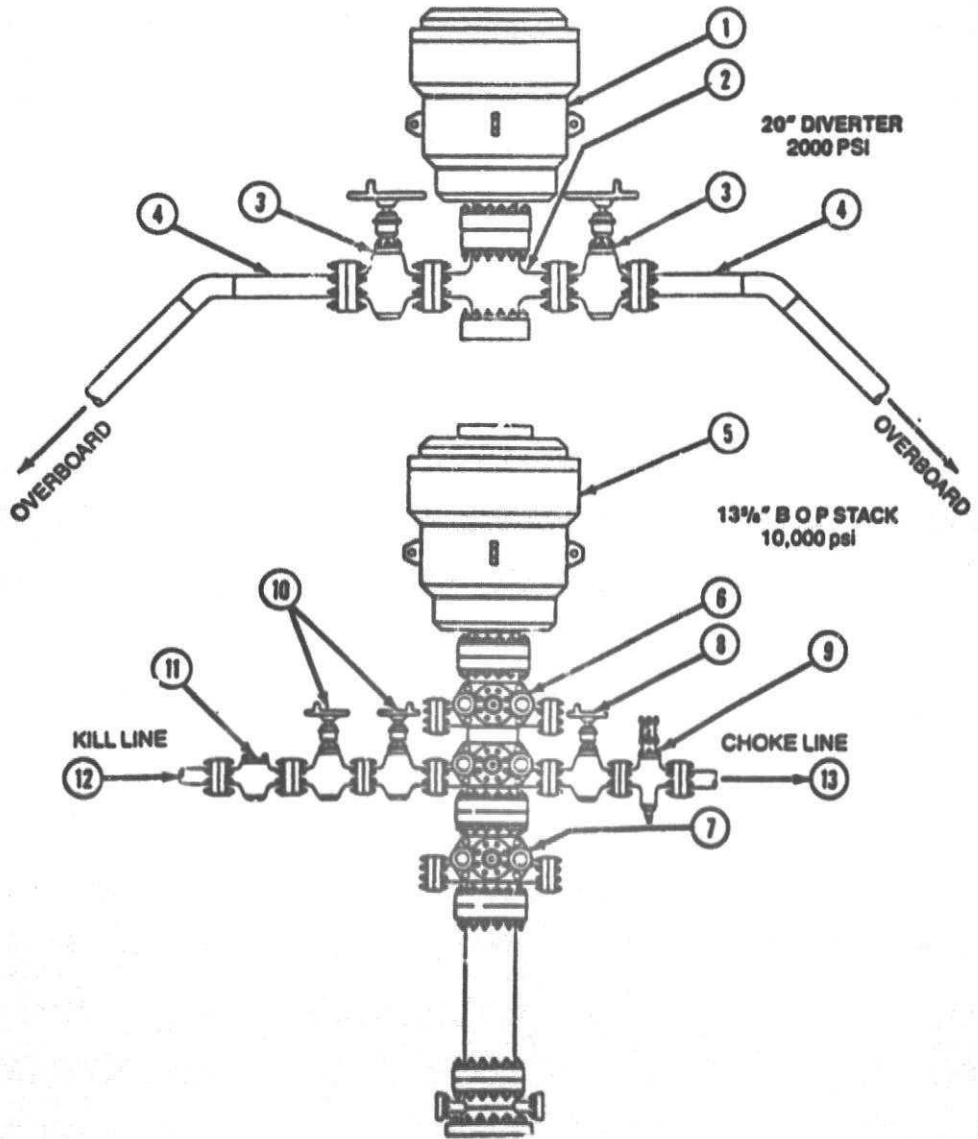
NER

One Arpa Camp - Suite 1000 Houston, Texas 77002 713-657-1000

MAIN PASS AREA
BLOCK 209
PERMIT PLAT
"A" PLATFORM

1000' 0 1000'

BLOWOUT PREVENTER STACK WITH A HYDRIL DIVERTER



Refer to following page for description of individual items of this assembly.



20" HYDRIL DIVERTER 2000 psi

ITEM	DESCRIPTION
1	20" HYDRIL 2000 psi Type MSP
2	20" FLANGE SPOOL 2000 psi w/6" 2000 psi Outlets
3	6" GATE VALVE std Low Pressure (REMOTE)
4	6" DIVERTER LINE (To Overboard)

BLOWOUT PREVENTER STACK

13⁵/₈' 10,000 psi

ITEM	DESCRIPTION
5	15 ¹ / ₂ " HYDRIL ANNULAR BOP 5000 psi Type GK H25 Trimmed
6	13 ¹ / ₂ " CAMERON DOUBLE BOP 10,000 psi WP H, 2S Trimmed
7	13 ¹ / ₂ " CAMERON SINGLE BOP 10,000 psi WP H, 2S Trimmed
8	4 ¹ / ₂ " MANUAL GATE VALVE Cameron Type "F" H, 2S
9	2 ¹ / ₂ " REMOTE HYDRAULIC VALVE Cameron Type "F" 10,000 psi H, 2S
10	2 ¹ / ₂ " MANUAL GATE VALVE Cameron Type "F" 10,000 psi H, 2S
11	2 ¹ / ₂ " CHECK VALVE Cameron Type "R" 10,000 psi H, 2S
12	3" 10,000 psi KILL LINE from Choke Manifold
13	3" 10,000 psi CHOKE LINE from choke Manifold

ATTACHMENT B-1

6" LINE



DRILLING MUD COMPONENTS

COMMON CHEMICAL OR CHEMICAL TRADE NAME

DESCRIPTION OF MATERIAL

Aluminum Stearate	Aluminum Stearate
"AXTAFLO-S"	Nonionic Surfactant
Barite	Barium Sulfate (BaSo4)
Calcium Carbonate	Aragonite (CaCo3)
Calcium Chloride	Hydrophilite (CaCl2)
Calcium Oxide	Lime (Quick)
Calcium Sulfate	Anhydrite (CaSO4)
Carboxymethyl Cellulose	Carboxymethyl Cellulose
Caustic Potash	Potassium Hydrate
Caustic Soda	Sodium Hydroxide (NaOH)
Chrome Lignite	Chrome Lignite
Chrome Lignosulfonate	Chrome Lignosulfonate
Drilling Detergent	Soap
"E-Pal"	Non-toxic, biodegradable defoamer
Ferrocchrome Lignosulfonate	Derived from wood pulp
Gel	Sodium montmorillonite, bentonite, attapulgite
Gypsum	CaSo4.2H2O
Lignite	Lignite
Lignosulfonate	Lignosulfonate
"Mud Sweep"	Cement Pre-flush
"MOR-REX"	Hydrolyzed Cereal solid
"Shale-Trol"	Organo-aluminum complex
Sapp	Sodium Acid Pyrophosphate
Soda Ash	Sodium Carbonate
Sodium Bicarbonate	NaHCO3
Sodium Carboxymethyl Cellulose	Sodium Carboxymethyl Cellulose
Sodium Chloride	NaCl
Sodium Chromate	NaCrO4.10H2O
Starch	Corn Starch
"TX-9010"	Biodegradable drilling lubricant
"TORQ-Trim"	Biodegradable drilling lubricant
"Black Magic"	Oil base mud conc.
"Black Magic Supermix"	Sacked concentrated oil base mud
Diesel	Used to mix certain loss-circulation pills
"Jelflake"	Plastic foil, shredded cellophane
MICA	Loss-circulation material
"Pipe-Lax"	Surfactant mixed with diesel
"Wall-Nut"	Ground walnut shells
Wood Fibers	Loss-circulation material

ATTACHMENT D



October 16, 1989

PROJECTED AIR EMISSION SCHEDULE FOR SUPPLEMENTAL DEVELOPMENT PROJECT**GENERAL INFORMATION**

Location of Facility: Main Pass Block 209
OCS-G 5717
Distance Offshore: 40 miles
Name of Platform: Jack-Up / Platform "A"
Operator: Pelto Oil Company
1800 One Allen Center
Houston, TX 77002
Contact Person: Mr. Jeffrey R. Hughes
Well Footage to be Drilled
in 1989:
Date Drilling Will Begin: November, 1989
Date Production Will Begin: December, 1989

MAJOR SOURCE (OFFSHORE)

Power used aboard drilling vessel; approximate footage to be drilled

<u>Emitted Substance</u>	<u>Projected Emissions *tons/yr.</u>
CO	1.39
SO ₂	.44
NOx	6.51
VOC	.53
TSP	.46

* Based on 60 hp/ir/ft. from Table 4-3, "Atmospheric Emissions from Offshore Oil and Gas Development and Production", EPA No. 450/3-77-026, June 1977

** Emission factors from Table 3.3.3-1, "Compilation of Air Pollutant Emission Factors", Third Edition, EPA Report AP-42, August, 1977

Projected Air Emissions
Pelto Oil Company
Main Pass Block 209
Page Two

MINOR SOURCES (OFFSHORE)*

<u>Emitted Substance</u>	<u>Projected Emission (Tons/Year) 1989</u>
CO	.52
SO	.03
2 NOx	.09
VOC	.05
TSP	.03

* Tables 3.2.1-3, 3.2.3-1 and 2.1-1, "Compilation of Air Pollutant Emission Factors", Third Edition, EPA Report AP-42, August, 1977.

ONSHORE SOURCES

These should be about the same as minor sources unless new facilities are installed at the onshore base. No additional facilities are required or planned at this time.

EMISSION EXEMPTION DETERMINATION

For CO: $E = 3400 \times \frac{2}{3} = 3400 (40) = 39,767$ tons/year
For NOx, VOC, TSP & SO : $E = 33.30 \times 33.3 (40) = 1332$ tons/year
2

As per DOI/MMS regulations, this facility is exempt from further air quality review as it has been determined that its operations will not have a significant adverse impact on air quality.