UNITED STATES DEPARTMENT OF THE INTERIOR

MINERALS MANAGEMENT SERVICE

Gulf of Mexico OCS Region

New Orleans, Louisiana

FINAL

SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT

No. N-3912

Exploratory Activity
Destin Dome Block 97
Lease OCS-G 8336

NOTED – KRAMER

December 1990

Commodity Oil and Gas SEA No N-3912

United States Department of the Interior
Minerals Management Service
Gulf of Mexico OCS Region
New Orleans, Louisiana

OCS SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT

Operator: Chevron U.S.A. Inc.
Plan Type: Plan of Exploration
Area: Destin Dome Block 97

Lease: OCS-G 8336
Date Submitted: November 13,1990
Plan Commencement Date: February 1, 1991

Prepared by Ted Stechmann

FINDING OF NO SIGNIFICANT IMPACT

I have considered the Plan of Exploration submitted by Chevron U.S.A. Inc., to drill exploratrory Well A in Destin Dome Block 97 (OCS-G 8336), and based on the environmental analysis contained in this environmental assessment with its mitigation measures, find that there is no evidence to indicate that the proposed action will significantly affect (40 CFR 1508.27) the quality of the human environment, and the preparation of an Environmental Impact Statement is not required.

FB

Regional Supervisor
Leasing and Environment

12/28/90
Date

ABBREVIATIONS AND ACRONYMS

AEA	Areawide Environmental Assessment
AER	Area Environmental Report
BOP	Blowout Preventer
Chevron	Chevron U.S.A Inc.
CSA	Continental Shelf Associates, Inc.
CZM	Coastal Zone Management
GOM	Gulf of Mexico
GPD	Gallons Per Day
H2S	Hydrogen Sulfide
MMS	Minerals Management Service
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NRC	National Research Council
NTL	Notice to Lessees and Operators
OCS	Outer Continental Shelf
ORD	Regional Director
POE	Plan of Exploration
SEA	Site-Specific Environmental Assessment
SER	Site-Specific Environmental Report
USDOI	United States Department of the Interior
USEPA	U.S. Environmental Protection Agency

TABLE OF CONTENTS

INTRODUCTION

This Site-Specific Environmental Assessment (SEA) submitted in support of an Areawide Environmental Assessment (AEA) is written for exploration activity proposed for Destin Dome Block 97. The SEA contains site-specific and updated information for the proposed action in Block 97 that is not contained in the AEA. The SEA was prepared using the AEA dated May 1984, entitled "Area-Wide Environmental Assessment for Exploration Activities in the Northwest Section of the Eastern Planning Area" as a base document. This base document can be obtained through the Public Records Office of the Minerals Management Service (MMS), Gulf of Mexico (GOM) Region, Outer Continental Shelf (OCS) Office. Those sections of the AEA that are referenced in the SEA are indicated throughout the text.

In compliance with the National Environmental Policy Act (NEPA), this AEA/SEA concept implements the tiering process outlined in 40 CFP 1502.20 which encourages agencies to tier environmental documents to eliminate repetitive discussions of the same issue. By use of reference to the AEA, the SEA concentrates on the issues specific to the proposed action. The SEA conforms to the MMS Procedures and Guidelines for preparing environmental assessments in compliance with the requirements of the NEPA.

I. DESCRIPTION OF THE PROPOSED ACTION AND NEED FOR THE PROPOSED ACTION

Description of the Proposed Action - Chevron U.S.A. Inc. filed a Plan of Exploration (POE) for Well A, Area Environmental Report (AER), Oil Spill Contingency Plan, Live Bottom Photodocumentation Survey, and Site-Specific Environmental Report (SER) on November 13, 1990, for Destin Dome Block 97, Lease OCS-G 8336. The area for which the exploration activities are planned is located approximately 48 km (29 mi) from shore. Water depths range from 29 m (96 ft) in the northwest corner of the block to 52 m (172 ft) in the southeast corner. Chevron is the operator of Lease OCS-G 8336 (Chevron, 1990).

The objective of the proposed operation is to evaluate the hydrocarbon potential of Destin Dome Block 97. A jack-up drilling rig, such as the Transworld 64, or similar rig would be used to drill the proposed well A. The surface location for the well is shown in Figure I-2. The well would be drilled, evaluated, and either temporarily or permanently abandoned in accordance with OCS order No. 3. The operator plans to commence drilling Location A upon approval of the Plan of Exploration, on or about February 1, 1991. Drilling of any additional wells would be contingent upon the results of Well A (Chevron, 1990). This action is considered routine for the GOM. For additional information concerning the proposed action, refer to Chevron's POE.

Need for the Proposed Action - The need for the proposal results from the mandate of the Outer Continental Shelf Lands Act (Section 11) which requires submission of exploration plans. This proposal contains Chevron's specific operational drilling proposal to explore the lease in a diligent manner.

II. ALTERNATIVES TO THE PROPOSED ACTION

Alternatives to approval of the proposal as originally submitted are:

Nonapproval of the proposal - Chevron would not be allowed to undertake the proposed plan of exploration activities in Destin Dome Block 97. This alternative could prevent discovery and development of much needed hydrocarbon resources and would result in loss of royalty income for the United States. Considering this aspect and the fact that minimal impacts are anticipated, this alternative was not deemed necessary.

Approval with additional mitigation - In the course of this evaluation process, the following protective measures were identified to further mitigate the environmental impacts associated with the proposal:

1. In compliance with the lease stipulation regarding control of electromagnetic emissions and operations of boat and/or aircraft traffic into the designated military warning area W-155, the operator must enter into an agreement with the Chief, Naval Air Training, Naval Air Station, Corpus Christi, Texas 78419-5100 (contact Lt. Commander Williams or Major Danuser at (512) 939-3927).

2. There is a possibility that the proposed activities may encounter H_2S. Adherence to 30 CFR 250.67 is required.

3. Our analyses indicate that there is a potential geologic hazard problem (shallow gas and faulting). Appropriate measures to mitigate potential impacts will be required of the lessee.

4. Permits cannot be issued until the States of Florida and Alabama determine the proposal is consistent with their CZM program or concurrence can be conclusively presumed. This action will require further evaluation based upon the findings of the States' consistency determination.

In addition to these measures, appropriate OCS Orders, regulations, and procedures are believed sufficient to prevent significant adverse impacts. Measures which TO proposed to implement to limit pollution effects are discussed in the initial POE, SER, and AER. Outer Continental Shelf Orders, NTL's, and Sale 94 Lease Stipulations Nos. 1; 2; 4(a), (b), (c), (d); 5; and 6 were identified throughout this assessment as existing mitigation for potential environmental impacts associated with the proposed POE.

III. DESCRIPTION OF THE AFFECTED ENVIRONMENT

Refer to Section III of the AEA, pages 3-49 (USDOI, MMS, 1984a), for information applicable to this section of the SEA. Additional information is included as necessary for impact analysis purposes in Section IV.B and IV.C of this SEA.

IV. ENVIRONMENTAL EFFECTS

Environmental effects as a result of the proposed action with mitigation are not expected to be controversial or significant in terms of NEPA.

A. ACCIDENTAL HYDROCARBON DISCHARGES

1. Oil Spill Accidents

A complete discussion of the causes of both major and minor oil spills resulting from exploration activity in the GOM is included in Section IV.A.1. of the AEA.

2. Vulnerability of Coastal Land Segments to Oil Spills

A summary of the trajectory analysis (for 10 days) simulated as a part of the Oil Spill Risk Analysis is presented in Table IV.4. of the AEA. Refer to Section IV.A.2. of the AEA for background information concerning these hypothetical oil spill trajectories.

Destin Dome Block 97 falls within the oil spill area 94, (see Figure IV-1 of the AEA). Impacts from an oil spill occurring in this oil spill area would be felt in the coastal land segments extending from Baldwin County, Alabama, to Bay County, Florida. Coastal land segment 24 (Escambia and Santa Rosa Counties in Florida) would be the most vulnerable with a 13% chance that an oil spill occurring in oil spill area 94 would contact this area within 10 days. The chance that an oil spill occurring in oil spill area 9[illegible]act Baldwin County, Alabama in this same time span is 1% [illegible]nty, Florida - 10%; Walton County, Florida - 6%; [illegible]nty, Florida - 1% (USDOI, MMS, 1984a). Refer to Section [illegible]of the Final Regional Impact Statement for a discussion [illegible]cors affecting the severity of an oil spill.

The prospect of there being an oil spill is guarded against through utilization of state-of-the-art drilling and blowout prevention equipment and through the use of best possible drilling practices by thoroughly trained personnel. These safeguards would be reinforced by operations curtailment programs enforced whenever sea state and weather conditions require. In the unexpected event that an accidental oil spill should occur, Chevron would conduct an emergency response to contain and cleanup the spilled oil (Chevron, 1990). Solid wastes from a spill would be disposed of in an approved landfill area (Ibid). General resource mobilization and response

plans are outlined in Chevron's approved Oil Spill Contingency Plan for the GOM, along with the CGA spill plan (Ibid).

In summary, the risk due to the proposed activity appears small. Most spills would be naturally dispersed within 60 days. In addition, most spills would be subjected to containment and cleanup efforts. The operator is a member of CGA which has spill containment and cleaning equipment strategically located along the Gulf Coast (TO, 1984). Details of Chevron's alert, reporting, and cleanup procedures are contained in the initial POE and SER. In addition, MMS conducts reviews of the various applications for compliance with OCS Orders, Notices to Lessees, etc., to insure safe drilling operations. A description of the BOP equipment and diverter system is contained in the supplemental SER information. Tenneco submitted an Oil Spill Contingency Plan along with the initial POE. Refer to this document for details concerning oil spill prevention and cleanup.

3. Effects of Oil Spills on the Environment

Refer to Section IV.A.3 of the AEA for discussions of oil spill impacts to coastal habitats, benthic communities, endangered or threatened species, other marine life including migratory waterfowl, commercial fishing, recreation/tourism, cultural resources, water quality, and air quality.

The operator will comply with the measures identified in Section II-3 of this SEA in order to mitigate, to the extent feasible, impacts resulting from an accidental oil spill.

B. ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION

1. Impacts Concerning Geology

In order to identify potential geological hazards, the available geological and geophysical data for Destin Dome Block 97 was reviewed by the Metairie District staff which resulted in a recommendation of approval (Appendix B). Seismic correlation (Geophysical Review) indicates the possibility of H2S near the Cotton Valley Formation, at approximately -17,000 feet; therefore, the Metairie District Supervisor recommended that H2S sensors be operational below 10,000 feet, and that the operator will need an H2S contingency plan.

The Metairie District Supervisor also indicated that shallow gas and faulting may be encountered during drilling operations. Appropriate measures to mitigate potential impacts will be required of the lessee.

2. Impacts Concerning Meteorology

Mitigation to be taken by Chevron during hurricanes, is discussed in Section 5.B.2. of the SER. In conditions of high winds

and reduced visibility due to fog or rain, helicopter traffic and/or boat traffic between the rig and shore bases would be temporarily suspended (CSA, 1990).

Interferences due to weather conditions are expected to be short-term and infrequent, producing only an insignificant effect on the movement of supplies and personnel to and from the facilities. The effect on offshore operations should be minimal. Additional information is included in section IV.B.2. of the AEA.

3. Impacts Concerning Physical Oceanography

Oceanographic conditions which could adversely affect the operation have been taken into consideration during the planning and designing of the proposed action. However, although drilling rigs are designed to operate in rough sea conditions, precautions would be taken by Chevron if a hurricane approached Block 97 (Chevron, 1990). Activities would be halted, protective measures taken, and facilities secured. No significant impacts from normal physical oceanographic conditions would be expected during the implementation of this exploration plan.

4. Impacts on the Biological Environment

a. Impacts on Coastal Habitats

Due to Block 97's distance from shore [48 km (29 mi)] and the use of an established onshore support base requiring no new construction, dredging, or filling, impacts other than those from oil spills on the area's biological environment would be insignificant. Further site-specific discussion of potential impacts to the benthos and sensitive underwater features are included under their respective headings. Refer to Section 5.c of the SER and Section IV.A.3. of the AEA for a discussion of oil spill impacts to the biological environment.

b. Impacts on Offshore Habitats

(1) Impacts on the Pelagic Environment

Impacts to pelagic biota are expected to be insignificant and short-term. Additional information is included in Section IV.B.4.b(1) of the AEA.

(2) Impacts on the Benthic Environment

Impacts to the benthic environment are generally discussed in Section IV.B.4.b.(2). Impacts other than those from oil spills should be insignificant. Chevron has submitted a live-bottom and photodocumentation survey for Well Site A in Block 97, which are designed to assess drilling-associated impacts to any live-bottom

areas existing in the block. The results of these surveys indicate that no areas of live-bottom are present in Block 97.

(3) Impacts on Sensitive Underwater Features

Live-bottom areas have been determined by the MMS to be worthy of protection by lease stipulation. In accordance with lease Stipulation No. 2 concerning potential hard/live bottom areas, a photodocumentation survey was conducted for the proposed drillsite in Block 97. The results of the survey can be found in the initial POE. Attached epibiota appears to be similar to the Inner and Middle Shelf Live Bottom Assemblage II depicted in the MMS sponsored Southwest Florida Shelf Ecosystem Study (CSA, 1990). The U.S. Fish and Wildlife Service and the National Marine Fisheries Service have reviewed the proposal, and did not recommend further protective measures (Appendix C).

c. Impacts on Endangered or Threatened Species

No adverse impacts are expected for any endangered or threatened species in the GOM. Additional information is included in Section IV.B.4.c. of the AEA.

d. Impacts on Breeding Habitats and Migration Routes

No adverse impacts are expected to occur to breeding habitats or migration routes. Additional information is included in Section IV.B.4.d. of the AEA

e. Impacts on Protected Areas of Biological Concern

No adverse impacts are expected during the exploratory activities planned in this block due mainly to the water depth at the sites. Additional information is included in Section IV.B.4.e. of the AEA.

C. IMPACTS ON SOCIOECONOMIC CONDITIONS AND CONCERNS

1. Impacts to Economic and Demographic Conditions

a. Impacts on Local Employment

Most of the employees required for this exploration activity would be transported by Chevron from another area of the Gulf. Refer to the SER (CSA, 1990) for the number of employees that will be utilized for the proposed operations, and their duties.

Due to the small number of employees that would be hired locally, impacts on local employment would be insignificant. Additional information is included in Section IV.C.1.a. of the AEA.

b. Impacts on Local Population and Industry Centers

The vessel crews required to operate the supply and standby vessels would usually accompany their respective vessels when they move to the site from another area of the Gulf. This transient personnel would not require local housing, because they would live on the vessel and would return to their residences upon completion of each tour of duty. Air support for the proposed operation will be provided by Petroleum Helicopters, Inc., which has an existing helicopter base in Panama City. Most of the employees required to operate the drilling rig would typically be assigned to the rig. They would stay with the rig while on duty and return to their home while off duty. No new employees or families would move permanently into the area (CSA, 1990).

Because most of the personnel are expected to return to their homes during off-duty shifts, no significant effects to population centers and industry are expected to result from the exploration activities. Expenditures for port requirements, supplies, fuel, and utility needs could contribute funds to the economy of the Panama City area (CSA, 1990.). Expansion of existing facilities to support the offshore and onshore activities is not expected because there would be little incentive on the part of industry to establish extensive facilities prior to the proven existence of commercial quantities of hydrocarbons (Herbert and Lampl, 1983).

2. Impacts on Land Use

a. Impacts of Increased Demands on Community Services

Increased demands on community service would be insignificant. No new families are moving into the area and the occasional demands of transient employees per drilling operation on local services would be insignificant
(CSA, 1990).

b. Impacts of Increased Boat and Air Traffic

Employees would be transported from the airport or the port directly to the drill site by helicopter or supply boat. Helicopters may also be used to transport specialty personnel such as casing crews, engineers, etc., and small supplies. The 8 additional flights per week as a result of the proposed operations in Block 97 would be insignificant compared to the total number of flights normally serving the area. The supply and standby vessels servicing these activities would follow the most direct route to the drill site. The additional vessel traffic (20 trips/month) supporting the proposed activities would not significantly affect existing vessel traffic (CSA, 1990).

c. Impacts of Competition for Scarce Coastal Resources and Demands for Goods and Services

Chevron would use an onshore support base located at Panama City for activities in Destin Dome Area, Block 97. No new land areas are expected to be occupied and no increased demands on existing dock space would be anticipated (CSA, 1990).

(1) Supplies and Equipment

Significant amounts of commodities to be purchased would include materials specialized for well drilling, electricity, and groceries. Major supplies and equipment to be used for the proposed activities include pipes for lining the hole (est. 1,350 tons), cement for securing the pipes (est. 10,000 sacks) and sacked drilling mud components (est. 22,000 sacks). Vendors for these materials have not yet been determined. Since the materials are highly specialized, demand for them should not affect local needs for goods and services (CSA, 1990).

(2) Water

Chevron plans to use seawater-based drilling fluids. Approximately 15,000 gallons of freshwater per day will be required for the proposed activities. Much of this quantity will be supplied by the freshwater-maker on the rig. The rest will be supplied from the shorebase area. Impacts on local and regional water supply should be low (CSA, 1990).

(3) Aggregate Energy

Approximately 80,000 gal. of diesel fuel per month and 3,000 gal. of lube oil per month will be purchased from local distributors. Present supplies in the area are adequate to handle the demand. The only use of electricity anticipated is that for office space. The rate of consumption should not exceed 5,000 kw per month. The impact on local supplies from this use will be negligible. Estimates are based on the requirements for one drilling rig (CSA, 1990).

(4) Other Resources

Other services and materials that may be needed to support offshore exploratory drilling are listed in Table III-12 of the AEA. Additional details of the types of vendors/contractors and specific demands for goods and services which could be required to conduct the planned activities are discussed in TO's SER.

3. Impacts from Construction of Onshore Support Facilities

Helicopter operations would originate from the Panama City-Bay County Airport. The onshore support facility for marine operations would be an existing site in the Panama City area. Refer to Section

(2)(h)(IV) of the SER for a description of these facilities. The supply terminal and helicopter base, both in the Panama City locale, would utilize existing facilities. No new construction, dredging or filling would be involved. The onshore base would be expected to have an insignificant impact on the Panama City area (CSA, 1990).

4. Impacts of Public Opinion

No significant public opposition to the planned operation has surfaced to date.

5. Impacts on Navigation

Exploratory activities in Block 97 should have an insignificant effect on shipping. Block 97 is located 48 km (29 mi) offshore and outside of any major shipping lanes or anchorage areas in the GOM (USDOI, MMS, 1984b, Visual No. 11). Marine traffic in support of the proposed activities is not expected to significantly affect shipping activities in the Panama City area, in part, because of the established port facilities already in existence and the temporary nature of the proposed activities. The impacts of the drilling rig on marine transportation (fishing and pleasure boating) could be both adverse and beneficial, because stationary structures could represent obstacles to navigation, but they also could serve as navigational aids. The operator is required to comply with U.S. Coast Guard regulations related to the safety of personnel and the display of prescribed navigational lights and signals for the safety of navigation. Chevron is also required to obtain permits from the U.S. Army Corps of Engineers to prevent obstructions to navigation. Additional information is included in Section IV.C.5 of the AEA.

6. Impacts Concerning Military Use

No objection was stated in the Department of the Air Force letter of September 29, 1988, Appendix C.

In compliance with the lease stipulation regarding control of electromagnetic emissions and operations of boat and/or air traffic into the designated military warning area W-151, the operator must enter into an agreement with Commander, Armament Division, 3246th Test Wing/CA, Aubrey Freeman/CCN, Eglin AFB, Florida 32542, Telephone (904) 882-3614. The operations are also located within the NCSC area; therefore, in order to provide control of boat and/or aircraft traffic entering into the NCSC area, the operator will enter into an agreement with the Naval Coastal Systems Center/Code 530, Attention: Mr. Ed Higdon, Panama City, Florida 32407, Telephone (904) 234-4626/4280. Conducting the exploratory operations in accordance with existing Stipulations Nos. 4 and 5 and Rider of Lease Form MMS-2005 (August 1982) is expected to reduce potential impacts to a minimal level.

7. Impacts on Commercial Fishing

Direct effects of exploratory operations on commercial fishing in Block 97 would be the removal of a limited area of seafloor from use and the temporary degradation of water quality at the immediate area of each drill site. Although some commercial fishing would be likely to occur within the vicinity of Block 97, no significant conflict of use is expected to develop in the area of the proposed action due to the distance from shore [48 km (29 mi)]. Refer to Section IV.A. of this SEA and the corresponding section of the AEA for a discussion of oil spill impacts to commercial fishing. Additional information is included in Section IV.C.7 of the AEA.

8. Impacts on Recreation/Tourism

Due to the distance offshore [48 km (29 mi)] and the temporary nature of the proposed activities, impacts to the aesthetics and recreational resources of the coastal area would be insignificant. Refer to Section IV.A. of this SEA and the corresponding section of the AEA for a discussion of oil spill impacts to recreation/tourism. Additional information is included in Section IV.C.8 of the AEA.

9. Impacts on Cultural Resources

Block 97 is located outside of both the Historical and the Prehistoric Cultural Resources high probability lines, therefore, no impacts to offshore cultural resources are expected. The operator states that existing onshore support facilities would be utilized; therefore, no impacts to onshore cultural resources are anticipated. Stipulation No. 1 of Lease Sale 79 provides further safeguards for the protection of presently unknown cultural resources. The operator is required to report, upon discovery of any site, structure or object of historical or archaeological significance to the ORD, MMS, GOM and make every reasonable effort to preserve and protect that cultural resource. Additional information is included in Section IV.C.9 of the AEA.

10. Impacts on Water Quality

According to CSA's SER, the total amount of drilling cuttings that would be discharged during the exploration activity is estimated at approximately 3,840 barrels of solids. Liquid wastes would include 50,000 bbl of drilling muds, 262,500 gal each of sanitary wastes and domestic wastes. Liquid and solid wastes from the activities would temporarily degrade the water quality in the immediate vicinity of the wells in Block 97 (CSA, 1990).

Implementation of the proposed activity would alter the water quality by resuspension of bottom sediments during placement of the drilling rig and the discharge of drill cuttings and muds and other liquid wastes. Rig installation has the potential to disperse pollutants entrapped in the bottom sediments into the water column

and create a turbidity plume. These activities would be of short duration and any pollutants would be rapidly dispersed over the block under consideration. At most depths typical of the continental shelf the majority of discharged fluids and cuttings are initially deposited on the seabed within 1,000 m (3,281 ft) of the point of discharge. This material may persist as initially deposited or may undergo rapid or prolonged dispersion, depending on the energy of the bottom boundary layer (National Research Council, 1983).

Because water quality is expected to quickly return to normal in the area after drilling operations have been completed, no significant impacts to the water quality of the area are expected as a result of the proposed activities. As discussed in Section I.J., all discharges would adhere to the standards imposed by the NPDES Permit. Refer to Section IV.A. of this SEA and the corresponding section of the AEA for a discussion of oil spill impacts to water quality. Additional information is included in Section IV.C.10 of the AEA and the operator's AEA.

11. Impacts on Air Quality

Onshore - The effects of the air emissions onshore would be negligible due to the distance of the drill sites to the northwest Florida coast. The percent increases in ambient concentrations contributed by the onshore secondary emissions from the proposed activities would be insignificant (CSA, 1990). Additional information is included in Section IV.C.11 of the AEA and in the operator's SER.

Offshore - Data presented in Appendix B of this SEA and in the operator's SER indicate that the total emissions expected from the proposed activities in Block 97 would be well below the calculated exemption levels, qualifying these activities for exemption from further air quality review. The site-specific air quality review conducted by MMS as a part of this environmental analysis concluded that there could be no significant effect on air quality from the proposed action. The emissions exemption calculations used in this analysis are given in the Air Quality Review (Appendix B). Additional information is included in Section IV.C.11 of the AEA and in the operator's SER.

12. Impacts on Other Commercial Uses

There are no other commercial uses in Block 97 to be affected by the exploration activity.

13. Impacts on Other Mineral Uses

There are no plans or proposals for mining other mineral resources other than oil and gas in Block 97; therefore, no conflict of use is expected.

14. Impacts Concerning Pipelines and Cables

No conflict of use is expected because there are no known existing pipelines in he eastern Gulf and because pipelines can not be proposed as a part of this exploration activity (Appendix B).

15. Impacts of Ocean Dumping

No conflict of use is expected because there are no existing ocean dumping areas designated in the eastern Gulf. The operator has stated that compliance with the USEPA NPDES permit will be maintained (CSA, 1990). Additionally, OCS Order No. 8 requires that the operator locate and retrieve any large debris lost overboard as a result of the proposed activities.

D. UNAVOIDABLE ADVERSE IMPACTS

Information in this section is included in Section IV.D of the AEA.

V. CONSULTATION AND COORDINATION

In accordance with provisions of 30 CFR 250.33 and DM 655, and the Memorandum of Agreement (1983) between the Department of Defense and the Department of the Interior, copies of the plan were forwarded to the U.S. Fish and Wildlife Service, National Marine Fisheries Center, and the commander, Armament Division, Eglin Air Force Base, Florida. Copies of the comments of these agencies are included in Appendix C. Comments from the State of Florida were not required for approval of this activity.

VI. BIBLIOGRAPHY

Chevron U.S.A. Inc. Plan of Exploration. Destin Dome Area, Block 97, Lease OCS-G 8336. New Orleans, LA. 1990.

Continental Shelf Associates, Inc. (CSA). Area Environmental Report, Gulf of Mexico: Florida, Pensacola Area, Blocks 989 and 990, and Destin Dome Area, Blocks 21, 22, 23, 24, 64, 65, 66, 67 68, 69, 109, 111, 112, 113, 154, 155, 199, 200, and 201. Prepared for Chevron Production Company. Jupiter, FL. 1987a.

Continental Shelf Associates, Inc. (CSA). Photodocumentation Survey of the Northern Three Quarters of Destin Dome Area Block 97, OCS-G 8336. Prepared for Chevron, Inc. Jupiter, Fla. 1990.

Herbert, T. A., and L. L. Lampl. The travel and residency patterns of rig workers: the Getty Oil Company East Bay Project, Santa Rosa County, Florida: presented at the 1983 Minerals Management Service Information Transfer Meeting. New Orleans, LA. November 15-17, 1983.

Continental Shelf Associates, Inc. (CSA). Site-Specific Environmental Report. Gulf Of Mexico: Florida, Destin Dome Area, Block 97, OCS-G 8336. Prepared for Chevron U.S.A. Inc., New Orleans, La. 1990.

National Research Council. Drilling Discharges in the Marine Environment. Washington, DC: National Academy Press. 1983.

Continental Shelf Associates, Inc. (CSA). Site-Specific Oil Spill Contingency Plan. Gulf of Mexico. Destin Dome Area, Block 97, OCS-G 8336. Prepared for Chevron, Inc. Houston, TX. 1990b.

U. S. Department of the Interior. Minerals Management Service. Area-Wide Environmental Assessment, Exploration Activities; Northwest Section of Eastern Planning Area, Gulf of Mexico Region. Metairie, LA. 1984a.

U.S. Department of the Interior. Minerals Management Service. Final Environmental Impact Statement. Proposed OCS Oil and Gas Lease Sales 94, 98 and 102 (Central, Western and Eastern Gulf of Mexico). Washington, DC: Available from NTIS, Springfield, VA. 1984b.

U.S. Environmental Protection Agency. Compilation of Air Pollutant Emission Factors, 2nd ed. AP-42. 1976

VII. PREPARERS

Author:

Ted Stechmann - Biologist

Typist:

Anne Maranto - Clerk Typist

VIII. APPENDICES

APPENDIX A - REVIEWS FROM MMS

APPENDIX B - REVIEWS FROM OTHER AGENCIES

APPENDIX A

REVIEWS FROM MMS

MEMORANDUM

Date: 11-16-90

To: Unit Supervisor, (MS 5231)

From: Unit Supervisor, (MS 5222)

Subject: Review of Initial POE, Chevron U.S.A., Control No. N-3912
Lease OCS-G 8336, Block 97, Destin Dome Area

Classification of Area per 250.67(c):

[ ] Zone(s) known to contain H2S

[X] Zone(s) where the presence of H2S is unknown

[ ] Zone(s) where the absence of H2S has been confirmed

Recommendation/Comments:

[ ] Approval recommended. Normal precautions will be adequate while conducting activities proposed in this POE.

[X] Approval is recommended with the following conditions: caution for shallow gas

[ ] Modification recommended as follows: _____

[ ] Disapproval recommended for the following reason(s): _____

[ ] Comments: _____

Enclosed are the following reviews as per your request:

[X] Hazards Review [X] Geophysical [X] Geological

Unit Supervisor

MINERALS MANAGEMENT SERVICE
RECEIVED
NOV 16 1990
FIELD OPERATIONS
Gulf of Mexico OCS Region, New Orleans, La.

Enclosures

HAZARDS REVIEW

Initial POE

Lease OCS-G 8336

Block 97

Destin Dome Area

Plan of Exploration No. N 3912

The subject proposal includes Well A.

Seafloor Hazards: No seafloor hazards

Subsurface Hazards: possible shallow fault and gas. H_2S might occur but unlikely

Other Hazards (Pipelines, Sunken Ships, Cables, etc.): None known

Preparer(s): a - a 4/

UNITED STATES GOVERNMENT
MEMORANDUM

Nov 14, 1990

To: Supervisor, Exploration/Development Plans Unit, Plans, Platform and Pipeline Section, Field Operations, Gulf of Mexico OCS Region (FO-2-1)

From: Supervisor, Platform/Pipeline Unit, Plans, Platform and Pipeline Section, Field Operations, Gulf of Mexico OCS Region (FO-2-2)

Subject: Plan of Exploration for Chevron USA.
Destin Dome Area, Block 97, Lease OCS-G 8336
30 CFR 250.34 Control No. N-3912

Proposed Well/Platform:

Identification and Location	Existing Pipelines Within 500 Feet
Well A. 4705'FSL & 2365'FEL	None

Remarks:

Frank Torres
Unit Supervisor

FTorres:jj:LEXITYPE Disk 7

MINERALS MANAGEMENT SERVICE
RECEIVED
NOV 15 1990
FIELD OPERATIONS
Gulf of Mexico OCS Region, New Orleans, La.

AIR QUALITY, BIOLOGICAL, AND CULTURAL RESOURCES REVIEW

CER/EA No. N-3912 Due Date 12/20/90 Lease OCS-G 8336

Area and Block DESTIN DOME 97

AIR QUALITY REVIEW (ATTACHED)

Onshore Base: THEODORE, ALA New or Revised: Yes __ No ✓

Rig Type: JU Distance Offshore 29 mi: Exempt: Yes ✓ No __

Information Source(s): PLAN, EIS VISUAL, STAFF

Comments/Recommendations: NONE

Meterologist — Date

BIOLOGICAL REVIEW

U.S. Fish and Wildlife Service Comments Required: Yes ✓ No __

The proposed action may impact a biologically sensitive area or organism/community: Yes __ No ✓

Special protective measures relative to endangered/threatened species reflecting previous biological opinions are recommended as conditions of plan/application approval: Yes __ No ✓

Information Sources(s): PLAN, EIS, FWS/NMFS, STAFF

Comments/Recommendations: NONE

Reviewer — 11/16/90 Date

CULTURAL RESOURCES AND SEAFLOOR HAZARDS REVIEW

New Surface Activities: Yes ✓ No __

Cul. Res. Rpt. Required: Yes ✓ No __ Submitted: Yes ✓ No __

Potential or known cultural resources within area of concern identified at location of the proposed action: Yes __ No ✓

Description: /

Information Sources(s): PLAN, EIS, CR REPORT, STAFF

Comments/Recommendations: NONE

Reviewer — 11/16/90 Date

OIL SPILL REVIEW

Company Name - Chevron USA

CER/EA No. - N-3912

Lease OCS-G 8236

Area and Block - DC 97

Primary oil spill equipment base - Theodore Ala until drilling well at which time equipment [illegible]

Response time - 11-16 hours

Trajectory analysis submitted: Yes ✓ No ___

The operator's response time/trajectory analysis is adequate
Yes ___ No ___ (see note)

Information Sources - Visuals, EIS, Staff, Play.

Comments/Recommendations note: 11 hr RT if vessel in Theodore - 16 h RT if vessel at [illegible]. Although the vessel and boat requirement is a little high at 7 hrs., this scenario is valid. The better of the choices between Pensacola where a vessel would not be readily available and Venice, La. which would require a response time of 18 hours. No further recommendation.

Reviewer: [illegible signature]

Date: 12/3/91

UNITED STATES GOVERNMENT
MEMORANDUM

Date 12/24/91

To: Chief, Plans, Platform, and Pipeline Section, Offshore Field Operations, GOM OCS Region (FO-2-1)

From: Chief, Environmental Operations Section, Leasing and Environment, GOM OCS Region (LE-5)

Subject: Preliminary Review of Plan/Application No. N-3912

CULTURAL RESOURCES

There is ___ is not ✓ a Cultural Resource problem requiring modification of the proposed location(s).

The problem is

The problem can be resolved by

BIOLOCICAL RESOURCES

There is ___ is not ✓ a Biological Resource problem requiring modification of the proposed locations(s).

The problem is

The problem can be resolved by

Oil Spill Information Review

12/28/91 There is ___ (see attached review) is not ✓ an oil spill information problem requiring supplemental information.

Jerry Brashier

cc: CER File (LE-5)

AIR QUALITY REVIEW

CER/EA No. N-3412 Due Date 12-20-90 Lease(s) OCS-G 8336

Block(s) 97 Area Destin Dome

Onshore Emissions

Onshore Base: Theodore, AL New or Revised: Yes __ No X

Onshore Emissions Calculations (If onshore base is new or revised): N/R

NO_x ____ tons/yr; CO ____ tons/yr; VOC ____ tons/yr;

TSP ____ tons/yr; SO_2 ____ tons/yr

Offshore Emissions

Major Sources - Offshore Emissions Calculations:

NO_x 94.04 tons/yr; CO 26.55 tons/yr; VOC 22.88 tons/yr;

TSP 6.18 tons/yr; SO_2 6.67 tons/yr

Minor Sources - Offshore Emissions Calculations:

NO_x 1.22 tons/yr; CO 3.82 tons/yr; VOC 1.24 tons/yr;

TSP 0.08 tons/yr; SO_2 0.08 tons/yr

Total Offshore Emissions:

NO_x 95.26 tons/yr; CO 30.37 tons/yr; VOC 24.12 tons/yr;

TSP 6.26 tons/yr; SO_2 6.75 tons/yr

Emissions Exemption Calculations

Distance to Nearest Land in Statute Miles: 29

Exemption: For CO; $E = 3400D^{2/3}$ = 32,093.04 tons/yr

For NO_x, VOC, TSP, SO_2; $E = 33.3D$ = 965.70 tons/yr

There will be significant effect on air quality from the proposed action:

Yes ____ No X

Information Source(s): Plan, EP.

Comments/Recommendations: None

E. Landry
Meteorologist

11-15-90
Date

UNITED STATES GOVERNMENT
MEMORANDUM

11/27/90

To: Chief, Plans, Platforms, and Pipeline Section, Field Operations, GOM OCS Region (FO-2-1)

From: Chief, Environmental Operations Section, Leasing and Environment, GOM OCS Region (LE-5)

Subject: Environmental Supporting Information for Plan Control No. N-3912, Lease OCS-G 8336, Block(s) 97, Area DESOTO CANYON

Our review of the subject plan's environmental supporting information required pursuant to the LTL dated October 12, 1988, has determined that the information is complete. Therefore, your office may proceed with the distribution of the information.

for Jerry Brashier

APPENDIX B

REVIEWS FROM OTHER AGENCIES

STATE OF FLORIDA

Office of the Governor

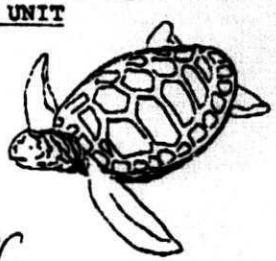
THE CAPITOL
TALLAHASSEE, FLORIDA 32399-0001

~~Copy~~ ORD - 1
Ted LE 3/5/91
N-391

EXECUTIVE OFFICE OF THE GOVERNOR

ENVIRONMENTAL & GROWTH MANAGEMENT POLICY UNIT

OFFICE TELEPHONE: (904) 488-5551
PANAFAX TELEPHONE: (904) 922-6200



THE FORTHCOMING 6 PAGE(S) ARE TO:

Rod Pearcy / Kent Stauffer
MMS - New Orleans

FROM: Debby Tudlee

DATE: 2/27/91 TIME: 16:45

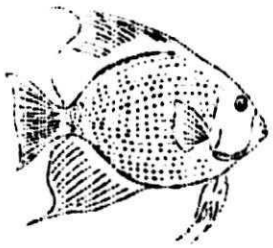
PANAFAX NUMBER: (504) 736-2610

OFFICE PHONE: 736-2589

SUBJECT: DD 97 Consistency Letter

REMARKS: Please get to Mr. Pearcy this afternoon

RECEIVED
MAR 4 1991
Minerals Management Service
Leasing & Environment



Florida Department of Environmental Regulation
Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400
Lawton Chiles, Governor
Carol M. Browner, Secretary

February 26, 1991

Mr. Kent E. Stauffer
U.S. Department of the Inter
Minerals Management Service
Gulf of Mexico Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

RE: Exploration Plan, Environmental Report, Photodocumentation Survey, and Site-Specific Oil Spill Contingency Plan
Destin Dome Block 97, (Control No. N-3912)
SAI # - FL9011300612C

Dear Mr. Stauffer:

The State of Florida has completed its review of the above-referenced documents and has evaluated the federal consistency certification for Outer Continental Shelf (OCS) oil and gas exploratory drilling activities on Destin Dome Block 97.

Department, functioning as Florida's lead Coastal Management cy pursuant to Section 306(c)(5) of the Coastal Zone ement Act, its implementing regulations at 15 CFR 930, t E, and Section 380.22, Florida Statutes, hereby notifies you that the State of Florida objects to Chevron U.S.A. Inc.'s consistency certification and assessment for the Plan of Exploration (POE), Environmental Report and accompanying information for Destin Dome Block 97 (Control No. N-3912).

The west Florida panhandle contains many sensitive marine and coastal resources which are vital to the State's well-being. The economy of this area is directly tied to these resources through such industries as tourism and recreational and commercial fishing. Oil and gas activities offshore Florida are not compatible with Florida's constitutional mandate and policies of protecting its marine and coastal resources of the State. To provide the necessary protection of Florida's sensitive coastal and marine resources, the State has adopted a policy of opposing oil and gas activities within 100 miles of the coast.

Specifically, we find that the POE and supporting information are inconsistent with the provisions of Chapters 253, 370, 376, and 403, Florida Statutes. Specific sections of these statutes are discussed as follows.

The Department of Environmental Regulation's responsibilities in the Florida Coastal Management Program (FCMP) most affected by the proposed exploration are found in the following specific statutory sections: 403.021(1), (2), (5) and (6); 403.061; 403.062, 403.161; and 403.918. These sections charge the Department with the prevention of pollution of waters of the State and the protection of the State's wetlands. In particular, Subsection 403.021(2), F.S., provides that no wastes are to be discharged into State waters without sufficient pretreatment necessary to protect the beneficial uses of those waters. The definition of "pollution" (403.031(7), F.S.) includes alterations to the biological integrity of the State's waters and is violated if harm to biota occurs(403.161, F.S.). Section 403.918, F.S. recognizes the value of the State's wetlands in providing fish and wildlife habitat and contributing to marine productivity. The Department is also instructed in section 376.051, F.S. to cooperate with the Department of Natural Resources in preventing pollutant discharges to waters of the State, specifically the marine influenced waters described in section 376.041, F.S. Pollution of marine and coastal waters is prohibited under section 376.041, F.S. The possibility of an oil spill resulting from this exploration conflicts with these provisions. DER is obligated by the cited statutory sections to prohibit pollution of waters of the State, thereby maintaining their quality for the many beneficial uses they provide to the citizens of the State.

In spite of Chevron's proposed preparedness, an accidental release of oil would threaten the quality of state waters and coastal habitats. Oil spill trajectories prepared for exploration of blocks off the panhandle have shown the potential for transport to State waters. The estuaries of the adjacent coastal area are nurseries for economically important fish and shellfish species. Offshore the panhandle, numerous fish and invertebrate species are found which have both commercial and recreational value.

In the event of such a release, Chevron proposed to mechanically contain or chemically disperse an oil slick or allow it to disperse naturally. Mechanical containment and chemical dispersion under the best of circumstances are only partially effective in containing or reducing the size of an oil slick. Oil which is not contained or dispersed may be transported to

shore and foul beaches, inlets, estuaries, grassbeds and wildlife. It is unlikely that the full extent of these shoreline habitats in the panhandle can be adequately protected with the shoreline boom and skimming equipment available to Chevron. Presently, only limited scientific knowledge is available regarding the effects of chemically dispersed oil on marine species, particularly subadult life stages. Until adequate dispersant toxic effects studies are completed, it is premature to rely on this method of spill control.

Chevron's proposed drilling will place the State's coastal resources at too great a risk. This risk is compounded by the cumulative impact of drilling numerous exploration wells followed by anticipated development and production activities, including pipeline transportation, throughout the shelf offshore of the panhandle. Oil and gas development should be set back 100 miles from the coast so that the State's natural resources are unaffected by these activities. Because Destin Dome Block 97 is well within this area, there are no alternatives which Chevron can offer to make its plan of exploration consistent with the DER's authorities in the FCMP.

The Marine Fisheries Commission is charged with the administration, supervision, development and conservation of the fishery resources of the State (370.013, Florida Statutes). Chapter 370, F.S. recognizes that in protecting the State's fisheries resources it is imperative to protect not only individual species, but more importantly the habitats necessary for the fisheries to survive. Section 370.025, F.S. declares that it is the policy of this state to manage and preserve its renewable marine fishery resources,....., emphasizing protection and enhancement of the marine and estuarine environment in such a manner as to provide for optimum sustained benefits and use to all the people of this state for present and future generations. (emphasis added)

In addition, it is clearly recognized that preservation of saltwater fisheries of this state does not end at the state/federal water interface. Section 370.103, F.S., authorizes the Department of Natural Resources to enter into cooperative agreements with the Federal Government....for the purpose of preserving saltwater fisheries within and without state waters and for the purpose of protection against.....any abuse whatsoever.

Vertebrate and invertebrate species that could be affected by petroleum production operations in the northwestern panhandles region of Florida are diverse. These include both estuarine and ocean (offshore) species.

The main estuarine systems located in this region are the Pensacola Bay, Choctawhatchee Bay and the St. Andrews Bay systems. These estuaries are regarded as nursery areas for numerous species that are economically important either because they are directly harvested, or because they are integral in the food chain. Outlined below are the most common species found in this area; however, this listing is not exhaustive.

Estuarine invertebrates: oyster, hard clam, bay scallop, blue crab, stone crab, white shrimp and brown shrimp.

Estuarine vertebrates: Various species of sharks, herrings, anchovies, jacks, drums, mackerels, butterfishes, flounders, groupers snappers, catfish, sea bass, bluefish, cobia, pompano, mullet and croaker.

The offshore portion of the panhandle contains numerous species that have commercial and recreational value; and as in the estuarine inventory, only those more common varieties are listed below.

Ocean invertebrates: various species of starfish, soft corals, urchins (including the longspined sear urchin, which is a protected species), calico scallop, spiny lobster, white shrimp, brown shrimp, and rock shrimp.

Ocean finfish: various species of snappers, groupers, mackerels, sharks, flounders, jacks, drums, seatrout, croaker, bluefish, herring, silver trout, marlin tuna, wahoo, sailfish and bonito.

The complex habitat created by the convergence of many species into marine communities could be affected by industrial-type activities such as drilling platforms and pipelines. Chevron's proposed activities, as such, place these as well as other fisheries resources and their marine and estuarine environments at risk. This risk is compounded by the cumulative impacts of drilling numerous exploration and development wells followed by installation of production platforms and pipelines for transport of product in the offshore area where extensive habitat for fishery resources exists.

These potential risks are clearly not compatible with the preservation of fisheries resources by protection and enhancement of the marine and estuarine environments. Therefore, absent a clear and distinct determination that such risks are nonexistent, the Marine Fisheries Commission objects to Chevron's proposed

activities because of inconsistency with Section 370.025, Florida Statutes.

The Board of Trustees of the Internal Improvement Trust Fund is responsible for ensuring that State sovereignty lands are managed primarily for the maintenance of essentially natural conditions, the propagation of fish and wildlife, and public recreation (253.034 (1)(a), F.S.). The Department of Natural Resources is charged with the administration, supervision, development and conservation of natural resources of the State. Specific directions are also to preserve, manage and protect the marine, crustacean, shell and anadromous fishery resources in State waters and to protect and enhance the marine and estuarine environment. These duties are directed, in the broad sense, at managing the fisheries in the interest of all citizens of the State to the end that they produce the maximum sustainable yield consistent with the preservation and protection of the breeding stock (370.013, 370.02(2), and 370.025, F.S.).

These broad responsibilities require that the Department express strong concerns when oil and gas exploration and production activities are proposed. Pollution of marine and coastal waters is prohibited under Section 376.041, F.S. and recent attention on the catastrophic results of oil spills in the marine environment have prompted the Department to undertake significant planning activities related to emergency response actions associated with oil spills. Disruption to the life cycles of many marine and estuarine species would result if oil spills occurred, even if the spills were not carried towards the shoreline. There is insufficient scientific documentation available to accurately predict and describe how many different impacts could result from a spill, specifically considering the use of chemical dispersion which is proposed by Chevron.

The proposed exploration activity will occur so close to the State's coastal area that response time will be shortened, and the chances of significant adverse environmental impacts occurring over time will be increased. The development in this area of many production wells, transportation of supplies and eventual development of offshore pipelines to transport the product back to the coast, would all pose additional threats to the natural resources in the State's adjoining submerged lands and to the marine resources which spend much of their life cycles in offshore waters. While it is not possible in this specific case to adequately address the Department's concerns by modifying the specific exploration plan for Destin Dome Block 97, it is the Department's position that oil and gas development occurring greater than 100 miles from the coast would afford a greater measure of protection for the State's coastal and marine

... Therefore, the Department finds the proposed ...es on Destin Dome Block 97 are inconsistent with ...atutory authorities discussed above.

... received from the Departments of Environmental ...gulation, Natural Resources, State, Commerce, the Governor's Energy Office, Marine Fisheries Commission, and West Florida Regional Planning Council are enclosed for your information. During the review period which has passed, the public was notified of the availability of the Plan of Exploration, and comments were solicited. The State has determined that the public notification requirements contained in 15 CFR 930.78 have been met.

Pursuant to 15 CFR 930.79, Florida hereby notifies Chevron, the Secretary of the Interior, and the Assistant Administrator, NOAA, that Florida objects to the consistency certification for the Plan of Exploration for Destin Dome Block 97.

Pursuant to 15 CFR 930.125, Chevron is notified that it has the right to appeal the State's decision to the Secretary of Commerce regarding the objection to planned exploratory activities on Destin Dome Block 97.

Sincerely,

Carol M. Browner
Secretary

CMB/dt

Enclosures

cc: Honorable Lawton Chiles, Governor
Honorable Buddy MacKay, Lt. Governor
Mr. Doug Cook, EOG/OPB
Mr. Tom Gardiner, DNR
Dr. Russell Nelson, MFC
Mr. Timothy R. E. Keeney, OCRM, NOAA
Mr. Thomas Gernhofer, DOI
Mr. Mark Witten, Chevron

GEOLOGICAL SURVEY OF ALABAMA

420 Hackberry Lane
P. O. Box O
Tuscaloosa, Alabama 35486 - 9780
(205) 349-2852

ERNEST A. MANCINI
State Geologist
and
Oil and Gas Supervisor

December 10, 1990

Mr. Kent E. Stauffer, Chief
Plans and Pipeline Section
Minerals Management Service
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

Dear Mr. Stauffer:

Re: MS 5231
Control No. N-3912

Staff members of the Geological Survey of Alabama and State Oil and Gas Board have reviewed Chevron U.S.A., Inc.'s Initial Plan of Exploration and Environmental Report for Lease OCS-G 8336, Block 97, Destin Dome Area. We have no comments on this material at this time.

We appreciate the opportunity to review Chevron U.S.A., Inc.'s Initial Plan of Exploration and Environmental Report and look forward to safe, successful operations in the Federal waters off Alabama's coast.

Sincerely yours,

Ernest A. Mancini

Ernest A. Mancini
State Geologist and
Oil and Gas Supervisor

iet

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Field Office
1612 June Avenue
Panama City, Florida 32405-3721

December 7, 1990

Memorandum

To: Regional Director, Gulf of Mexico Outer Continental Shelf Region, Minerals Management Service, New Orleans, Louisiana attn: Ms 5231

From: Acting Project Leader, Fish and Wildlife Service Field Office, Panama City, Florida

Subject: Initial Plan of Exploration, Chevron U.S.A., OCS-G 8336, Block 97, Destin Dome Area, Control No. N-3912

The Fish and Wildlife Service has reviewed the subject document in accordance with 655 DM 1. The document covers the exploratory drilling of well A in block 97, Destin Dome Area.

Review of the Plan indicates the absence of live bottom habitats in Block 97. The Oil Spill Contingency Plan indicates that although the drillsite is seaward of the Oil Spill Stipulation B Zone, the Stipulation B requirements will be implemented for this activity. Therefore, we have no objection to the proposed operations.

We appreciate the opportunity to provide comments.

cc:
NMFS, Galveston, TX (Environmental Assessment Branch)
John de Mond, LA DNR, Baton Rouge, LA (attn: Bill Pittman)
Ken Graham, MMS, New Orleans, LA

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
9450 Koger Boulevard
St. Petersburg, FL 33702

December 3, 1990

Mr. Kent E. Stauffer
Chief, Plans and Pipeline Section
Minerals Management Service
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

Dear Mr. Stauffer:

The National Marine Fisheries Service has reviewed the Initial Plan of Exploration for Lease OCS-G 8336, Block 97, Destin Dome submitted with your letter dated November 27, 1990 (MS 5231; Control No. N-3912). Based upon our review of the material submitted to us, we have no objection to the proposed drilling of Well A.

Should you have any questions, please contact Dr. Ed Keppner of our Panama City Area Office at 904/234-5061.

Sincerely yours,

for Andreas Mager, Jr.
Assistant Regional Director
Habitat Conservation Division