

UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE
Gulf of Mexico OCS Region
New Orleans, Louisiana

FINAL

SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT
ENDANGERED SP/ES/STRUCTURE REMOVAL
No. ES/SR 92-020

Structure-Removal Activities
Eugene Island Area, Block 366
Lease OCS G 8700

Summer, 1992

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UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE
Gulf of Mexico OCS Region
New Orleans, Louisiana

FINAL

SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT
ENDANGERED SPECIES/STRUCTURE REMOVAL
No. ES/SR 92-020

Assessment of the Environmental Impacts of the Proposed
Removal of Platform A in Eugene Island Area,
Block 366 (Lease OCS-G 8700)
by Forest Oil Corporation

Date Submitted: February 6, 1992
Commencement Date: Summer, 1992
Prepared by Gary Rutherford

FINDING OF NO SIGNIFICANT IMPACT

I have considered the notification by Forest Oil Corporation to remove Platform A in Eugene Island Area, Block 366 (OCS-G 8700), SEA No. ES/SR 92-020. Based on the environmental analysis and mitigative measures contained in the site-specific environmental assessment there is no evidence to indicate that the proposed action will significantly (40 CFR 1508.27) affect the quality of the human environment if the permit/application is approved subject to all of the mitigative measures. Preparation of an environmental impact statement is not required.



File
Regional Supervisor
Leasing and Environment
Gulf of Mexico OCS Region

6/26/92
Date

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INTRODUCTION AND BACKGROUND

The purpose of this Site-Specific Environmental Assessment (SEA) is to assess the specific impacts associated with proposed structure-removal activities. The SEA is based on a Programmatic Environmental Assessment (PEA) (USDOJ, MMS, 1987) which evaluates a broader spectrum of potential impacts resulting from the removal of structures; e.g., platforms/caissons across the central and western planning areas of the Gulf of Mexico Outer Continental Shelf. The PEA/SEA process is designed to simplify and reduce the size of environmental assessment documents by eliminating repetitive discussions of the same issues. This SEA conforms to MMS and other appropriate guidelines for preparing environmental assessments by utilizing data presented in the PEA to complete the assessment. It presents site-specific data regarding the proposed structure removal and evaluates the potential impacts. Mitigation measures are contained in this document to lessen potential impacts. Preparation of this SEA has allowed the determination of whether a Finding of No Significant Impact (FONSI) is appropriate or whether further assessment of the proposal is necessary.

I. DESCRIPTION OF THE PROPOSAL AND NEED FOR THE PROPOSAL

A. DESCRIPTION OF THE PROPOSED ACTION WITH MITIGATION

Forest Oil Corporation proposes to remove Platform A in Eugene Island Area, Block 366 (Lease OCS-G 8700). The structure is located in a water depth of 345 feet and lies approximately 76 miles southwest of Terrebonne Parish, Louisiana. Forest plans to remove the caissons by mechanical means and to use bulk charges if the mechanical cutters are unsuccessful. The operator also plans to use bulk charges to sever the four skirt piles of Platform A sixteen feet below the mudline. The jacket will be "reefed" in place and is currently in a deteriorating state of Louisiana for the proposition.

See Table 1 for specific data regarding the explosive removal operation.

Refer to Appendix A for structure specifications for the removals, additional data on removal techniques, and sequence of events.

MITIGATION

The following mitigative measure was identified by the operator in the application to remove Platform A to reduce the likelihood of death or injury to sea turtles and marine mammals.

A "marine mammal" watch will be performed 48 hours prior to and during the use of explosives.

There are existing pipelines within 150 meters (490 feet) of the proposed structure-removal activity. Precautions in accordance with NTL No. 83-3, Section IV.B., will be taken prior to conducting the removal activity.

B. NEED FOR THE PROPOSED ACTION

A discussion of the legal and regulatory mandates to remove abandoned oil and gas structures from Federal waters can be found in the PEA (USDOJ, MMS, 1987). The platform has no more useful purpose to Forest Oil Corporation because the reservoir has been depleted and the Lease will terminate in 1993.

II. ALTERNATIVES TO THE PROPOSED ACTION

Alternatives to the proposed structure removal with mitigations originally submitted are:

A. NON-REMOVAL OF THE STRUCTURE

Forest Oil Corporation would not proceed with the proposed removal. This alternative would eliminate the possibility that sea turtles, marine mammals, or other marine life would be harmed by removal of the structure as proposed. However, non-removal of the structure would represent a conflict with Federal legal and regulatory requirements, which mandate the timely removal of obsolete or abandoned structures within a period of one year after termination of the lease, or upon termination of a right-of-use or easement. Therefore, non-removal does not appear to be a valid alternative.

B. REMOVAL OF THE STRUCTURE BY ALTERNATIVE NON-EXPLOSIVE METHODS

The MMS has discussed various structure-removal techniques in the Final Environmental Impact Statement (FEIS) for Proposed Oil and Gas Lease Sales 131, 135 and 137 (USDOJ, MMS, 1990) and the PEA (USDOJ, MMS, 1987). It was concluded that the most effective methods of structure removal are the use of explosives, either bulk or shaped charges, and underwater arc cutting. Other methods appear promising but require additional development to solve the operational and logistical problems associated with these techniques. Primarily for this reason, they do not appear to be feasible alternatives for the removal of the subject structure.

Refer to the FEIS (USDOJ, MMS, 1990) and PEA (USDOJ, MMS, 1987) for detailed information concerning alternative methods of structure removal.

C. REMOVAL OF THE STRUCTURE AS PROPOSED WITH ADDED MITIGATION

Refer to the Summary Evaluation (Appendix B), the terms and conditions of the Incidental Take Statement (Appendix C), and any mitigation identified by this SEA necessary to reduce the likelihood of death or injury to sea turtles and marine mammals.

Our analyses indicate there are existing pipelines within 150 meters (490 feet) of the proposed structure-removal activity. Precautions in accordance with NTL No. 83-3, Section IV.B., will be taken prior to conducting the removal activity.

A "marine mammal" watch will be performed 48 hours prior to and during the use of explosives.

III. ENVIRONMENTAL EFFECTS, SOCIOECONOMIC CONCERNS, AND OTHER CONSIDERATIONS

A. PHYSICAL ENVIRONMENT

1. Environmental Geology and Geologic Hazards

A discussion of environmental geology and geologic hazards can be found in the PEA (USDOI, MMS, 1987). The proposed structure-removal activity is not in an area of sediment instability (mud flows, slumps, or slides). Therefore, geologic conditions are not expected to have an impact on the proposed structure-removal activity.

2. Meteorological Conditions

No impacts are expected as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

3. Physical and Chemical Oceanography

a. Physical Oceanography

No impacts are expected as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

b. Chemical Oceanography

Impacts are expected to be very low as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

4. Water Quality

Impacts are expected to be low as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

5. Air Quality

Impacts are expected to be very low as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

B. BIOLOGICAL ENVIRONMENT

1. Coastal Habitats

No impacts are expected as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

2. Protected, Endangered, and/or Threatened Species

a. Birds

The PEA (USDOI, MMS, 1987) delineates sensitive areas along the Texas coastline where whooping cranes and brown pelicans could be adversely impacted by structure-removal support activities. The operator has indicated that Intracoastal City, Louisiana would be used as the shore base. Very little impacts on threatened or endangered birds are expected.

b. Marine Mammals

A discussion of marine mammals occurring across the Gulf of Mexico (GOM) and an assessment of the potential impacts of structure-removal activities on marine mammals can be found in the PEA (USDOI, MMS, 1987). Fritts, et al. (1983) conducted aerial surveys across a 9,514 square-mile area of GOM waters. Results of these surveys indicate that the bottlenose dolphin is probably the most likely marine mammal to be encountered at the proposed structure removal(s). A marine mammal watch will be conducted with the NMFS 48 hours prior to severing with explosives. If marine mammals are detected at the structure-removal site, detonation of the primary charges would be delayed until the animals are removed from the area. In spite of these precautions, a low probability exists that marine mammals could enter the blast area undetected and could be injured or killed by the underwater, subsurface detonations. Such an occurrence is considered highly unlikely and with the indicated protective mitigation measures, the proposed structure-removal activity is expected to have only a low impact on marine mammals.

c. Sea Turtles

A discussion of sea turtles occurring across the central and western GOM and an assessment of the potential impacts of structure-removal activities on sea turtles can be found in the PEA (USDOI, MMS, 1987). Studies by Fritts, et al. (1983) and Fuller and Tappan (1986) as well as stranding data from the Sea Turtle Stranding and Salvage Network (Teas, 1989) indicate that sea turtles occur in the vicinity of the proposed activities and therefore could be impacted by the structure-removal operations. Definitive information on the probability of encountering sea turtles at the removal site during explosive operations is scarce. NMFS and/or MMS observers will be utilized to look for sea turtles prior to detonation of the primary charges. If sea turtles are detected at the structure-removal site, detonation of the primary charges will be delayed until the animals are removed from the area. As in the case of marine mammals, the possibility exists that sea turtles could enter the blast area undetected and could be injured or killed by the underwater, subsurface detonations. This occurrence is considered unlikely, and with the indicated protective mitigation measures, the proposed structure-removal activity is expected to have only a low impact on sea turtles. An incidental take (by injury or mortality) of one documented Kemp's ridley, green, hawksbill or leatherback turtle or two loggerhead turtles is set for this removal. With all the precautions to be taken as mitigation measures it is unlikely that any sea turtles will be affected by this proposed operation.

3. Birds

Impacts are expected to be very low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

4. Sensitive Marine Habitats

A discussion of sensitive marine habitats occurring in the central and western GOM and an assessment of the potential impacts of structure-removal activities on these areas can be found in the PEA (USDOI, MMS, 1987). The proposed activities are not near any sensitive marine habitats. Therefore, the subject structure-removal activity will not impact any sensitive marine habitats or their resident biota.

5. Offshore Habitats and Biota

Impacts are expected to be low as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

C. SOCIOECONOMIC CONCERNS

1. Employment

Impacts are expected to be very low as a result of the proposed activity. For analysis information, see the PEA referenced in the introduction.

2. Economics

Impacts are expected to be very low as a result of the proposed activity. For analysis information, see the PEA referenced in the introduction.

3. Onshore Support Facilities, Land Use, and Coastal Communities and Services

The operator has indicated that Intracoastal City, Louisiana, would be the shore base for the proposed structure removal activity. No impacts are expected as a result of the proposed activity. For analysis information, see the PEA referenced in the introduction.

D. OTHER CONSIDERATIONS

1. Commercial and Recreational Fisheries

a. Commercial Fisheries

For analysis information, see the PEA referenced in the introduction. Since the PEA was originally written, new concerns have emerged concerning the impacts of explosive structure removals on reef fish populations. On May 9, 1991 the Gulf of Mexico Fishery Management Council expressed concern over declining stocks of reef fish, especially red snapper. They referred to oral accounts of finfish kills associated with explosive removals of offshore structures in order to limit these activities with their concerns about declining populations of reef fish. They further suggested that MMS should hold all explosive structure removals in abeyance until more information becomes available on the effects of these activities on fish stocks. See the PEA (Section on Offshore Habitats and Biota) for a discussion of fish kills in association with explosive structure removals.

MMS has declined to hold all explosive structure removals in abeyance citing the regulatory mandates for structure removals and problems with current non-explosive structure removal methods. MMS has stated a commitment to carry out studies to assess the impacts of oil and gas structure removals on Gulf fisheries resources and the results of these studies will be used to determine future policies with respect to these activities.

MMS continues to consider the overall impacts of structure removals on commercial fishing to be low. The MMS policy of encouraging an active rig-to-reefs program will help to offset cumulative structure-removal impacts to fisheries resources.

b. Recreational Fisheries

Impacts are expected to be low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction. See the preceding section for a discussion of fish kills in association with explosive structure removals.

2. Archaeological Resources

Impacts are expected to be low as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

3. Military Use/Warning Areas and Explosive Dumping Areas

A description of military use/warning areas and explosive dumping areas, their locations, and potential impacts of structure-removal activities on these areas can be found in the PEA (USDOI, MMS, 1987). The proposed structure-removal activity will not take place in any of these areas.

4. Navigation and Shipping

The proposed structure-removal activity is not located near a vessel safety fairway. Structures located nearshore may serve as "landmarks" to vessels or helicopters operating in the area on a regular basis. The overall impacts of the proposed work on navigation and shipping are expected to be very low. More information on the impacts of structure removals on navigation and shipping can be found in the PEA (USDOI, MMS, 1987).

5. Pipelines and Cables

The PEA (USDOI, MMS, 1987) contains a description of the impacts of structure-removal activities on pipelines and cables. There are existing pipelines within 150 meters (490 feet) of the proposed structure-removal activity. Precautions in accordance with NTL No. 83-3, Section IV.B., will be taken prior to conducting the removal activities; therefore, the proposed work will not pose a hazard to pipelines and cables in the area.

6. Other Mineral Resources

No impacts are expected as a result of the proposed activity. For analysis information, see the PEA referenced in the Introduction.

7. Human Health and Safety

The PEA (USDOJ, MMS, 1987) describes the hazardous conditions for workers during structure-removal activities. The operator has proposed the use of explosive and mechanical cutting in conjunction with the structure removal activity. Existing legal and regulatory safety requirements will keep the impacts of the proposed work on human health and safety at a very low level.

E. UNAVOIDABLE ADVERSE IMPACTS

A discussion of unavoidable adverse impacts can be found in the PEA (USDOJ, MMS, 1987). Two areas of ongoing concern have been the potential impact to protected, threatened, and/or endangered species and potential loss of habitat to the marine environment. Both topics are discussed in the PEA and previously in this document. A more recent issue of concern has surfaced regarding the impacts of explosive structure removals on reef fish stocks. This issue has been previously discussed in this document. Although the impacts to commercial and recreational fisheries is considered to be low, further studies information about this issue should be available in the future. Other unavoidable adverse impacts are considered to be minor.

IV. PUBLIC OPINION

A discussion of public concerns regarding structure removals can be found in the PEA (USDOJ, MMS, 1987).

In May 1991, the Gulf of Mexico Fishery Management Council requested that the MMS place a moratorium over the explosive removal of offshore structures with three or more supports. Nonremoval of these structures would conflict with current Federal legal and regulatory requirements which mandate the timely removal of abandoned or obsolete structures within a period of one year after termination of the lease, or upon termination of a right-of-use or easement.

The MMS believes that current data on the effects of explosive removals on fish mortality is insufficient to draw any conclusions, and a moratorium on all but single pile caissons at this time is unjustified. In order to quantify explosive effects, the MMS initiated an interagency study with the NMFS to determine fish mortalities from platform removal operations. In addition to the above study, MMS supports an active rigs-to-reef program and encourages industry to search for method that will minimize effects on fish from platform removal operations.

V. CONSULTATION AND COORDINATION

In accordance with the provisions of Section 7 of the Endangered Species Act, the proposed structure-removal operation

has been coordinated with the NMFS. Their comments are included in Appendix C. The NMFS concluded that removal of the structure will not likely jeopardize the continued existence of any threatened or endangered species under their purview. Additionally, they concluded that the proposed removal may result in the injury or mortality of loggerhead, Kemp's ridley, green, hawksbill, and leatherback turtles. Therefore, they established a low level of incidental take and discussed various measures necessary to monitor and minimize this impact (see Appendix C). The NMFS noted that no incidental taking of marine mammals was authorized under Section 101(a)(5) of the Marine Mammal Protection Act of 1972 in connection with the proposed structure-removal activities. Therefore, taking of marine mammals by the operator would be prohibited unless they successfully apply for and obtain a permit or waiver to do so from NMFS.

VI. BIBLIOGRAPHY AND SPECIAL REFERENCE(S)

Forest Oil Corporation 1989. OCS platform/structure removal application. Houston, TX.

Fritts, T.H., A.B. Irvine, R.D. Jennings, L.A. Collum, W. Hoffman, and M.A. McElroy. 1983. Turtles, birds, and mammals in the northern Gulf of Mexico and nearby Atlantic waters. U.S. Fish and Wildlife Service, Division of Biological Services, Washington, D.C.

Fuller, D.A. and A.M. Tappan. 1986. The occurrence of sea turtles in Louisiana coastal waters. Coastal Fisheries Institute. Center for Wetland Resources. Louisiana State University. Baton Rouge, LA.

Teas, Wendy G. 1989. 1989 semi-annual report of the sea turtle stranding and salvage network. Atlantic and Gulf Coasts of the United States. January - June 1989. National Marine Fisheries Service. Southeast Fisheries Center, Miami Laboratory, 75 Virginia Beach Drive, Miami, FL.

U.S. Department of the Interior. Minerals Management Service. 1989. Final Environmental Impact Statement. Gulf of Mexico Sales 131, 135 and 137: Central, Western and Eastern Planning Areas. OCS EIS/EA MMS 90-0042. Washington, D.C. Available from NTIS. Springfield, VA: PB-90273582/AS.

U.S. Department of the Interior. Minerals Management Service. 1987. Programmatic Environmental Assessment. Structure-removal activities Central and Western Gulf of Mexico Planning Areas. OCS/EA 87-0002. Gulf of Mexico OCS Region, New Orleans, LA.

Table 1

Explosives Proposed by the Operator for the Structure-Removal in Eugene Island Area, Block 366 (OCS-G 8700)

Type of Explosives:

Composition B, bulk charges

Number and Size of Charges:

1-50lb charge each for the A-1 and A-2 wells
1-40lb charge each for the A-3 and A-4 wells
Four charges, 100 lb. each for the skirt piles

Deployment of Charges:

Inside, a minimum of 16 feet below the mud line

Sequencing of Detonations:

One 50lb charge each will be used to remove the caissons of the A-1 and A-2 wells. One 40lb charge each will be used to remove the caissons of the A-3 and A-4 wells.

Skirt piles:

All piles will be detonated simultaneously with a 0.9 second delay between each charge

VII. PREPARERS

Author:

Gary Rutherford - Geologist

Typist

Sandra Pavlas - Clerk Typist

VIII. APPENDICES

- A. FOREST OIL CORPORATION CORRESPONDENCE
- B. MMS SUMMARY EVALUATION
- C. NMFS CORRESPONDENCE

APPENDIX A
FOREST OIL CORPORATION CORRESPONDENCE

Executive > 500

NON - GENERIC

Handwritten initials

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UNITED STATES GOVERNMENT
MEMORANDUM

FEB 6 1992

Rush

Minerals Management Service
Leasing & Environment

Feb 5, 1992

To: Environmental Operations Section (LE-5)
From: Office of Structural and Technical Support, Field Operations,
Gulf of Mexico OCS Region (OSTS)
Subject: Platform Removal

OPERATOR: Forest Oil Corporation

Control No: ES/SR 92-20 (SEC No. 0093)

<u>Platform</u>	<u>Area/Block</u>	<u>Lease</u>
<u>A</u>	<u>EI 366</u>	<u>OCS-G 8700</u>
_____	_____	_____
_____	_____	_____

Shore Base: Intercoastal City, LA

Enclosed is one copy of the subject application. We will transmit the Endangered Species Action Section Consultation Documentation subsequent to receipt of your Summary Evaluation. There are/ ~~are~~ existing pipeline(s) within 500 feet of the proposed removal location.

Arvind Shah
Arvind Shah
Extension 2894

Enclosure

cc:

AShah: :LEXITYPE:Disk 5

92-20



FOREST OIL CORPORATION

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Office of Structural and Technical Support

TELECOPIEX COVER LETTER

DATE: 3/6/92

TOTAL NUMBER OF PAGES (including Cover Letter): 8

TO: Mr. David Shad
Mineral Mgt. Serv.

TELECOPIEX PHONE NO.: 504-736-2610

FROM: Cecil Colwell
Operations Division

COMMENTS. _____

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FOREST OIL CORPORATION

1700 Denver Place • 329 Eighteenth Street
Denver, Colorado 80202 (303) 293-1467

March 6, 1992

Regional Supervisor, Field Operations (OSTS)
Minerals Management Service
1201 Elmwood Park Blvd.
New Orleans, Louisiana 70123

Attn: Mr. Arvid Shah

Re: EI 366
Platform Removal

Dear Mr. Shah:

Forest Oil Corporation requests permission to use explosives to sever the cassettes at 16' below the mud line. Attached please find the charge size and type along with the cassette OD & thickness at the sever point. Forest will attempt to remove these cassettes by mechanical means first & wishes to amend our initial application to use explosives as a back up means should mechanical cutters prove unsuccessful.

Please make a note of our new address and phone number. Should any additional information be necessary contact me at 303-293-0460, your assistance is appreciated.

Regards,

Cecil N. Colwell
Division Drilling Superintendent

CNC/alt
losures

EAGLE JUNE

1/2

1. Well NO: 065-G 8700 A-1

AT 16' Below MUD LINE

30" X 1" WT

CMT BETWEEN 30 X 20

20" X 0.438" WT

CMT BETWEEN 20 X 13 3/4

13 3/4" X 0.438" WT

NO CMT BETWEEN 13 3/4 X 9 5/8

9 5/8" X 0.395" WT

EXPLOSIVE: 50 LB BULK CHARGE OF Comp "B"

2. Well NO 065-G 8700 A-2

AT 16' Below MUD LINE

30" X 1" WT

CMT BETWEEN 30 X 20

20" X 0.438" WT

CMT BETWEEN 20 X 13 3/4

13 3/4" X 0.438" WT

NO CMT BETWEEN 13 3/4 X 9 5/8

9 5/8" X 0.395" WT

EXPLOSIVE: 50 LB BULK CHARGE OF Comp "B"

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EVERETT ISLAND 356

2/2

3. Well No: OCS-G 8700 A-3

AT 16' BELOW MUD LINE

26" X 3/4" WT

16" X 0.438" WT

10 3/4" X 0.350" WT

CMT BETWEEN 26 X 16

CMT BETWEEN 16 X 10 3/4

EXPLOSIVE: 40 LB BULK CHARGE OF Comp "B"

4. Well No. OCS-G 8697 A-4

AT 16' Below MUD LINE

24" X 5/8" WT

16" X 0.438" WT

10 3/4" X 0.350" WT

7 5/8" X 0.328" WT

CMT BETWEEN 24 X 16

CMT BETWEEN 16 X 10 3/4

CMT BETWEEN 10 3/4 X 7 5/8

EXPLOSIVE: 40 LB BULK CHARGE OF Comp "B"

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FOREST OIL

W.S. 6 2300

REB-110

PROPOSED 74A

WD-345

26" x 3/4" WT RIGGS w/ "XL" THREDS

MUD LING

VELCO "HTB" CONN LATCHED OUTU
18 3/4" WHH @ 438'
18 3/4" 61" K-57 BTC RIGGS w/ VELCO
TR-B CONN STUBS IN @ 445'
3 3/4" 40" K-57 BTC RIGGS w/ VELCO
TR-B CONN STUBS IN @ 445'
30" WHH @ 445' (14' ABV ML)

30" x 1" @ 580' (167P) - SET IN PLACE

200' SURFACE PLUG # (500-700) w/
8000 "H"

PERF 26PF 3480-82'
SET RETA UBL @ 3430' SQ
100SK "H", 5 SET 10 SK ON
TOP, TEST 1000 SW.
SET TOC 3410'

70" 30" W-40 BTC @ 1716' MD/1214 TD
CMT w/ 624 SK TLW + 400 SK TAIL, ENOUP-
TO CIR CMT TO SURFACE - NO 26PT. SK OUT
SQ 20TH W/ 65 PERFS w/ 100SK "H" EACH
& LONG TOC IN EACH STRINA 50' ADJUT
PER @ 3485'

OTIS 2.25" X 11"
IN LOTS 137 ACV
PER.

OTIS 2.25" PER @ 3885'
XN N10716 @ 4000
IN 86

13 3/4" 61" K-57 BTC @ :
CMT w/ 1600 SK TLW + SK
TO CIR CMT TO SURFACE -
CMT w/ WASH TOOL

OTIS 2.25" X
N10716 @ 4534'
BOT @ 4605'

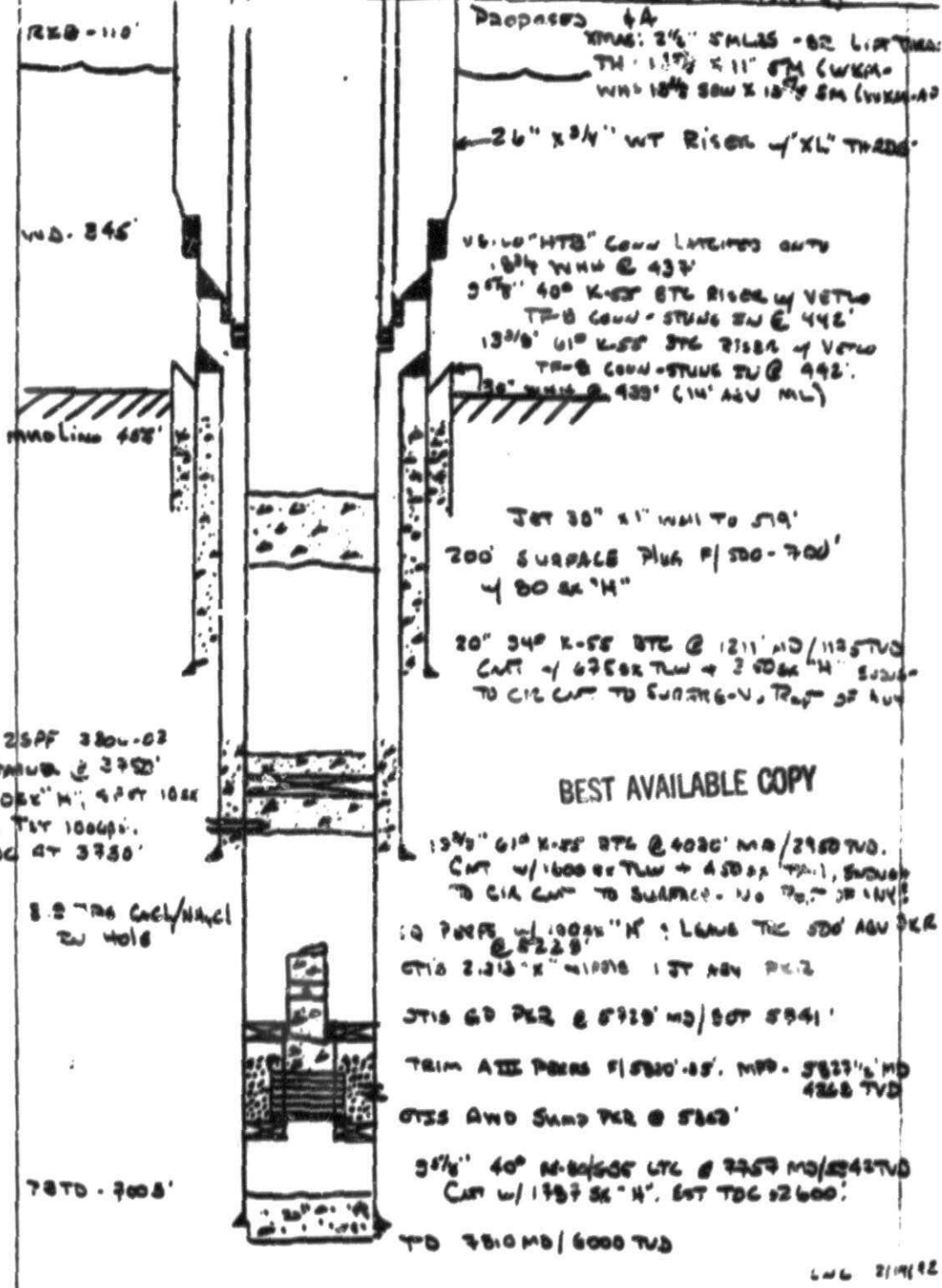
OTIS 6P @ 4218'
TRIM A II, 4490-4580', MDD 4535 MD/4024
OTIS 2001 PER @ 4585'

TT PLASTIC PLUG
IN 6P BOT;
TT 97 @ 5100'
6' 60-705644'
11' PLASTIC-TOP 5035'

OTIS 6P PER @ 5186'
TRIM A IV; 5526-5728', MDD 5623 MD/4927T
OTIS 5000 PER @ 5445'
PSTD 6735'
3 3/4" 40" N-80/5-95 LTC @ 6806 MD/5802 TD
CMT w/ 1800 SK "H" . SET TOC 2210'

TD 10500' MD/8000 TD w/ 140" MUD

PCS-6 8300 (SLT 2)



Proposed #4
 STUB: 2 1/2" 5MLAS - 82 LIFT TUBES
 TH: 1 1/2" x 11" STM (W/STUB)
 WH: 18 1/2" 80W x 18 1/2" 80W (W/STUB)

26" x 3/4" WT RISER w/ XL TUBES

16.00" HTB" Lead LINEDS OUT
 18 1/4" WH @ 437'
 35 1/2" 400 K-55 BTC RISER w/ VETLO
 TR-B COND-STUBS SW @ 442'
 130 1/2" 610 K-55 BTC RISER w/ VETLO
 TR-B COND-STUBS SW @ 492'
 30" WH @ 493' (14" AGU ML)

Jet 30" x 1" WHI TO 579'
 200' SURFACE PUG F/ 500-700'
 w/ 80 SK "H"

20" 340 K-55 BTC @ 1211' MD/1125' TVD
 CUT w/ 625 SK TLW + 2 1/2" SK "H" SUGAR
 TO CIL CUT TO SURFACE - V. TRAP OF 400'

BEST AVAILABLE COPY

13 1/2" 610 K-55 BTC @ 4030' MD/2980' TVD.
 CUT w/ 1600 SK TLW + 4 1/2" SK "H", SUGAR
 TO CIL CUT TO SURFACE - NO TRAP OF 1000'

10 PUFFS w/ 1000 SK "H" : LEAVE TIC 500' AGU SKR
 @ 5220'
 OTIS 2.312" x 11000 1ST AGU PUL

OTIS 60 PUL @ 5720' MD/507' 5541'

TRIM ALL PUFFS F/ 5200'-05'. MD - 5827 1/2' MD
 4268' TVD

OTIS AND SAND PUL @ 5860'

35 1/2" 400 K-55/B55 BTC @ 7250' MD/5245' TVD
 CUT w/ 1957 SK "H". 6ST TDC 52600'

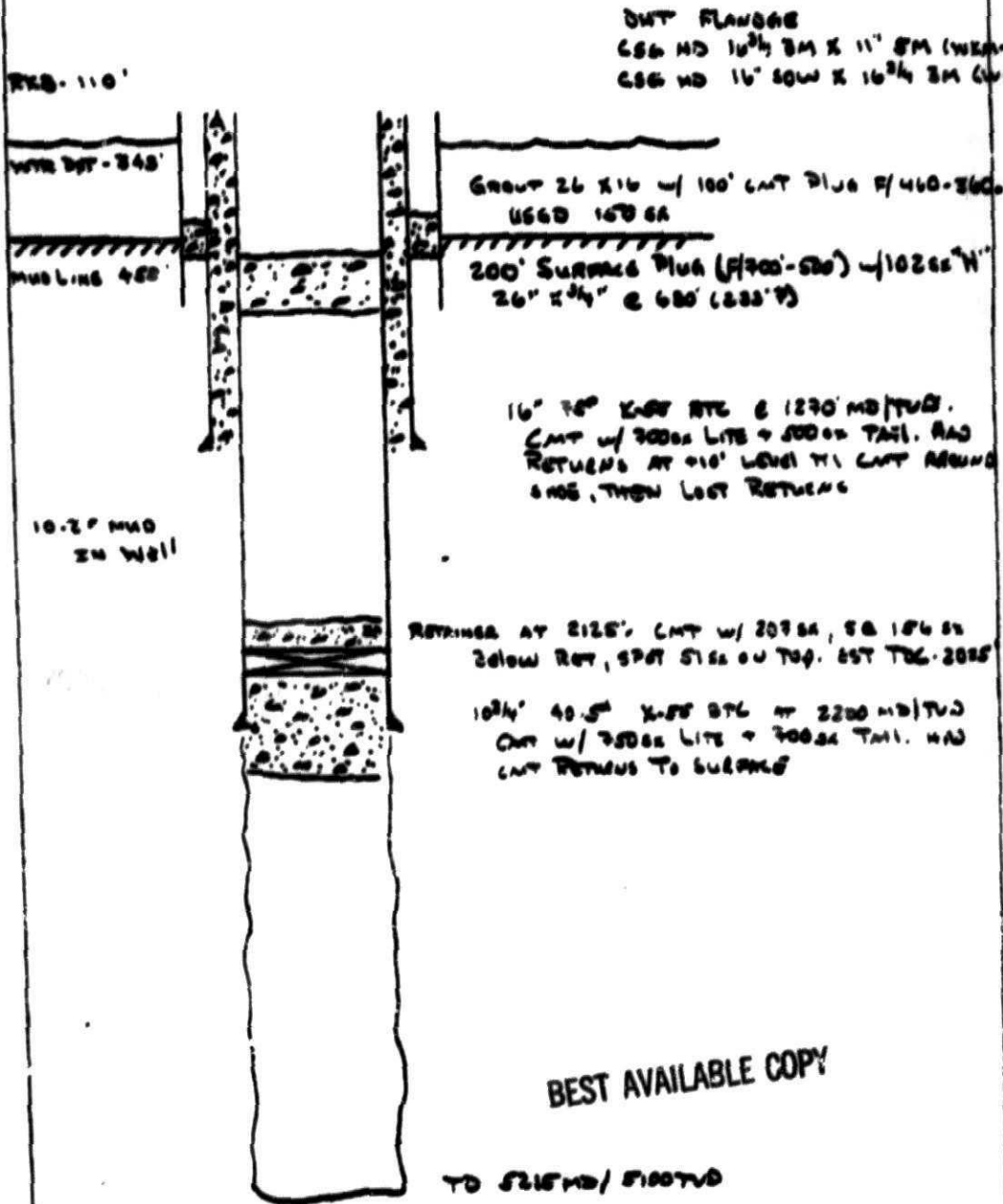
TO 7810 MD/6000 TVD

POFF 2, 25PF 320W-02
 SET RETAINER @ 3950'
 2 1/2" 100 SK "H", 4 1/2" 10 SK
 IN TOP. TLT 1000 SK.
 6ST TDC AT 3750'

B.S. TUB CASH/NA/CL
 IN HOLD

7810 - 7008'

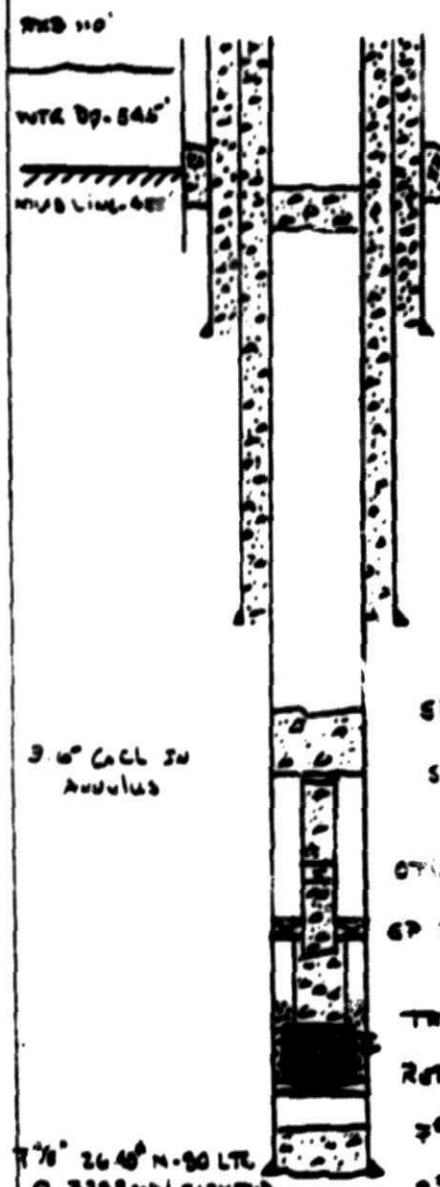
PRESENT Well Bore



BEST AVAILABLE COPY

TO 5215 MD / 5100 TVD

Proposed P/A of Well



4-MAS 2 1/2" 5M SINGLE BR LIFT TUBS
 TEG MD 11" X 7/16 5M (WKM-6)
 CCG MD 16 3/4 3M X 11" 5M (WKM-8P)
 CCG MD 16" 80W X 16 3/4 3M (WKM)

GRANTED 24 7/16 w/ 100' LIFT Plug of
 445'-365'. USED 1500M

200' SURFACE Plug (P/200'-500') w/ 500x11"
 24" X 7/16 WT @ 713' (2407)

16" 30 L-55 STEEL @ 1000 MD/TVD. LIFT
 w/ 5000 L/W + 5000Y TMI. HAS OCCASIONAL
 PARTIAL RETURNS AT 610'.

10 3/4" 40-S L-55 STEEL @ 2955 MD/2608 TVD.
 LIFT w/ 5000X L/W + 6450X TMI. HAS
 LIFT RETURNS TO SURFACE

SPOT 200' Plug w/ 500x11" @ 6045'-5895'

SQ PERFS w/ 1000x11". LEAVE TDC 300'
 ADV PER @ 6045'.

OTIS 2.313 "X" WIPING 1 JT ADV PER

EP PER @ 6595' / EOT @ 6500

TRIM A W PERFS 6624-24, WIP 6629 MD
 6603 TVD

RET @ 6640'

3 3/8" LIFT w/ 735 3/4 L/W / 5000X TMI. HAS LIFT
 RETURNS @ SURFACE.

3 3/8" HOLE TO 3408' MD / 5129 TVD w/ 5000X TMI

7 7/8" 26 1/2 N-80 LTR
 @ 7359 MD / 5124 TVD

BEST AVAILABLE COPY

CUC



FOREST OIL CORPORATION

January 29, 1992

Regional Supervisor, Field Operations (OSTS)
Minerals Management Service
1201 Elmwood Park Blvd.
New Orleans, Louisiana 70123



Dear Sir:

Attached please find the proposed OCS platform/structure removal forms, as supplied by your office, for the removal of Forest Oil Corporation's Eugene Island 366 "A" platform. Your approval to remove this structure according to this procedure is requested. Forest proposes to "reef" the jacket in place at Eugene Island 366 and is currently petitioning the State of Louisiana with such a proposition. The platform will be removed during the summer of 1992 and a "marine mammal watch" will be performed prior to and during the use of explosives to sever the platform piles 15' below the mud line.

Enclosed with the platform removal forms are general descriptions with detailed drawings of the proposed platforms for removal. A procedure for "Site Clearance" is also presented along with grid patterns for the sonar scan and trawl patterns. The specific trawling and sonar scan contractors will be submitted for your approval prior to abandonment.

Should any additional information be required please contact, Cecil Colwell at 318/988-9400 at Forest's Lafayette office. Your assistance is appreciated.

Regards,

Cecil N. Colwell
Division Drilling Superintendent

CNC/ssb

Attachments

EXPPER.MMS

PROPOSED OCS PLATFORM/STRUCTURE REMOVAL

I. Responsible Party

- A. Lease operator name FOREST OIL CORPORATION
- B. Address P. O. Box 31910, Lafayette, Louisiana 70593
Street Address: 500 Dover Blvd., Lafayette, Louisiana 70503
- C. Contact person and telephone number Cecil N. Colwell (318) 988-9400
- D. Shore base Intercoastal City

II. Identification of Structure to be Removed

- A. Platform name FOC - Eugene Island 366 "A"
- B. Location (lease, area, block, and block coordinates) Eugene Island 366, OCS-G-8700, x= 1,973,988.30' & y= 196,522.10'
- C. Date installed (year) 1989
- D. Proposed date of removal (Month/Year) July 1992
- E. Water depth 345'

III. Description of Structure to be Removed

- A. Configuration (attach a photograph or a diagram)
Jacket: 365' long, 45' x 60' top & 170' x 135' base
- B. Size Deck: 78' x 120' - 3 Decks
- C. Number of legs/casings/pilings 4 pile with 4 skirt piles
(see attached description & drawings)

skirt pile
 D. Diameter and wall thickness of legs/casings/pilings _____
 Legs: 80" x 1.25" & 81" x 1.75"
skirt pile Piles: 72" x 2-1/4" & 60" x 1.00"

E. Are piles grouted? ** _____ Inside or outside? Outside
 **72" piles in skirts are grouted
 60" piles in jacket legs are not
 F. Brief description of soil composition and condition _____

IV. Purpose

Lease expiration date and reason for removing the structure _____
 Lease expiration date 7/93

V. Removal Method

A. Brief description of the method to be used Above water components
will be torch cut. Explosives will be used to sever piles.

B. If explosives are to be used, provide the following:

1. Kind of explosives Composition B, C-4, Cyclotol or Octol, Bulk
2. Number and sizes of charges 4 each of 75 lbs. for main piles and 4 each of 100 lbs for skirt pile

a. Single shot or multiple shots? Multiple

b. If multiple shots, sequence and timing of detonations _____

4 skirt piles at one time with ^{0.7} a one second delay between each charge, followed one minute later with 4 main piles with a one 0.7 second delay between each charge.

- 3. Bulk or shaped charge? Bulk
- a. Depth of detonation below mud line 16 feet
- b. Inside or outside piling? Inside

C. Pre-removal monitoring techniques

- 1. Is the use of scare charges or acoustic devices proposed? No
If yes, provide the following:
 - a. Number and kind _____
 - b. Size of charges _____
 - c. Brief description of how, where, and when scare charges or acoustic devices will be used _____

- 2. Will divers or acoustic devices be used to conduct a pre-removal survey to detect presence of turtles and marine mammals? No
If yes, briefly describe the proposed detection method _____

D. Post-removal monitoring techniques

- 1. Will transducers be used to measure the pressure and impulse of the detonations? No

- 4
2. Will divers be used to survey the area after removal to determine and effects on marine life? No

VI. Biological Information

If available, provide the results of any recent biological surveys conducted in the vicinity of the structure. If available, describe any recent observations of turtles or marine mammals at the structure site. No turtles sighted.

PLEASE SEND THREE COPIES OF THE APPLICATION TO:

Regional Supervisor, Field Operations (OSTS)
Minerals Management Service
1201 Elmwood Park Blvd.
New Orleans, Louisiana 70123

ATTACHMENTS:

E.I. 366 Platform drawings
National Marine Fisheries Service Report
Platform Structure Removal Procedure
Pipeline P & A Procedure
Site Clearance Procedure

Eugene Island 366 "A"

Platform Abandonment

1. All wells and caissons will be plugged and abandoned as per MMS regulations and will have been retrieved from 15' below the mud line.
2. The 12" gas pipe line from Eugene Island 366 "A" to Eugene Island 342 "subsea tie-in" to the 30" TEN-TET-TXG will have been pigged and plugged.
3. Set up derrick barge at Eugene Island 366 location.
4. Remove sump caissons and temporary supports to the caissons as required.
5. Cut the deck legs at the stabbing points.
6. Rig to lift the deck section from the jacket and set on the material barge.
7. Jet out piles to the proper severing depth.
8. Lower charges to proper severing depth using pneumo to confirm depth.
9. Detonate charges.
10. Rig to the jacket and topple in place.
11. Pick up anchors.

Note: A marine mammal watch will be conducted with the National Marine Fisheries Service 48 hours prior to severing with explosives.

RUGENE ISLAND 166 #2A

The platform is a 4 pile with 4 skirt piles, 12 slot facility with 4 wells. The platform is set in 145' of water and was designed to process 100 MMCFD. The platform design engineering was by CBS Engineering of Houston, Texas. The jacket was fabricated by McDermott in Amelia, Louisiana, in 1989 and installed in December, 1989.

The total height of the jacket is 165', with a 45' by 60' top, and a 170' by 135' base. The legs vary from 80 - 81" diameter with 72" diameter grouted piles in the skirts, to 60" diameter ungrouted jacket legs. The estimated total weight of the jacket is 2,200 tons.

The deck was also fabricated by McDermott. The production deck is 78.3' by 110.5' and has a deck load capacity of 300 PSF. The drilling deck is 78.6' by 127.6' and has a load capacity of 1000 PSF out board of the skid beams and 500 PSF between the skid beams. The cellar deck is 45' by 60' with a deck load capacity of 250 PSF. All three decks have a combined weight of approximately 1100 tons with equipment ~~with~~ equipment.

The platform also has four (4) curved conductors located in the row closest to the center of the platform. The conductors are 26" by 3/4" wall with a radius of curvature of 3 1/2 degrees per 100' starting at the +15' level.

347

Y = -194,061.98'

30°

2,490.12'



4,032.62'

FOREST OIL CORPOATION
PLATFORM "A"
4-PILE D & P PLATFORM
X=1,973,966.30'
Y = -196,522.10'

BLK. 366

365

X=1,960,955.66'

X=1,984,977.84'

367

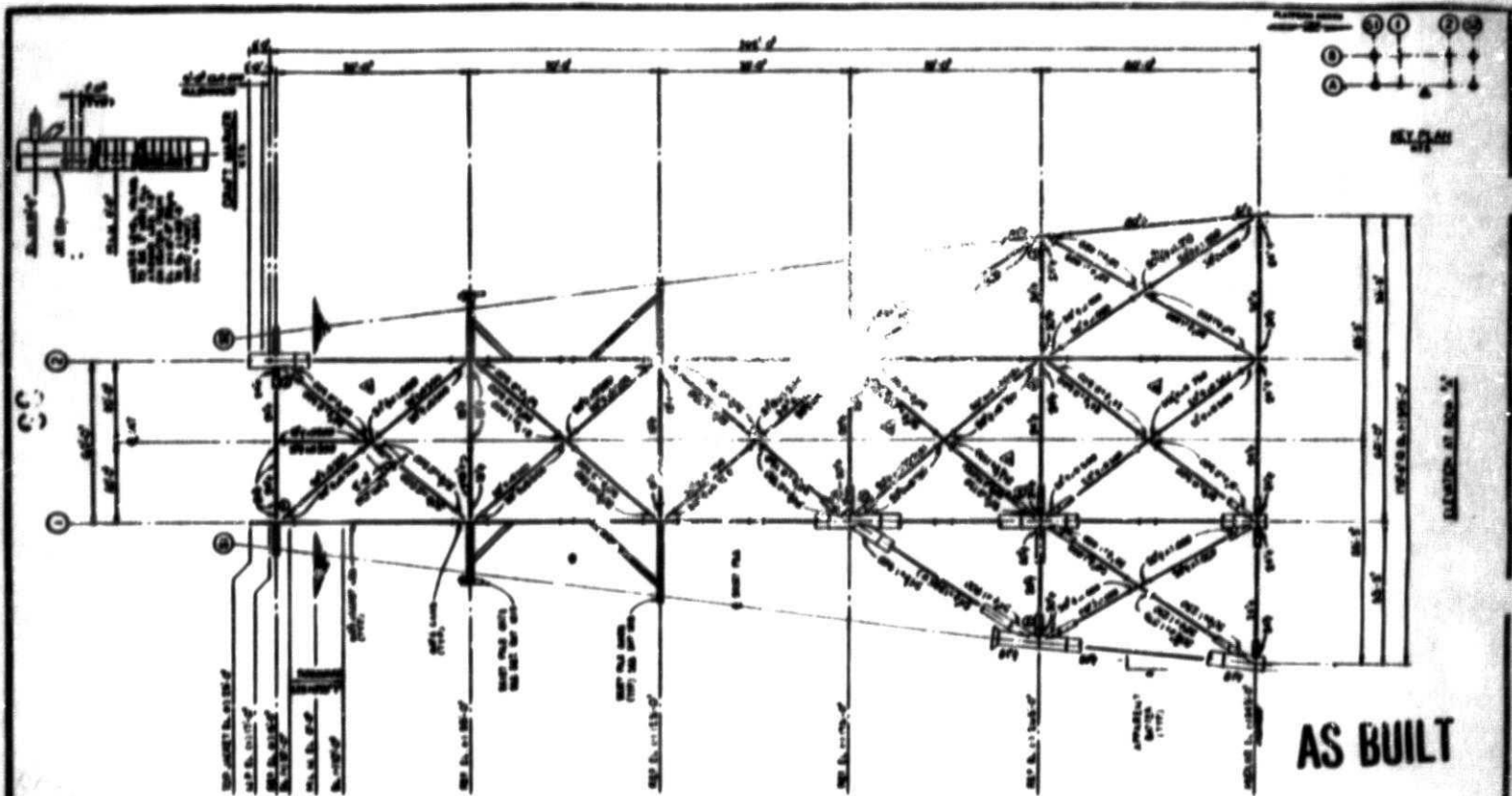
Y = -208,560.56'

369

SCALE:----1"=2,000'

COORDINATES ARE BASED ON LOUISIANA LAMBERT, SOUTH ZONE

APPLICATION BY:	FOREST OIL CORPOATION	OCS-G-8700		
LOCATION:	EUGENE ISLAND AREA SOUTH ADDITION	DATE: JUNE 1959	SHEET	OF
				RE



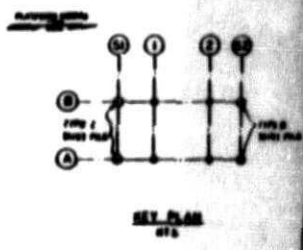
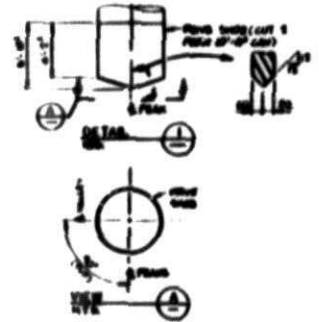
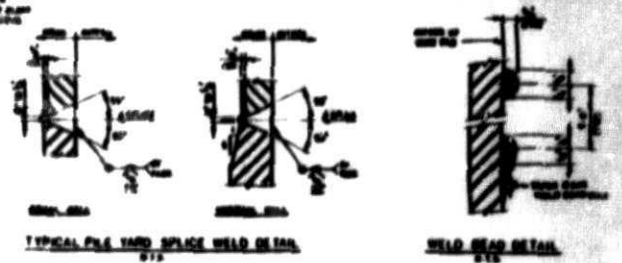
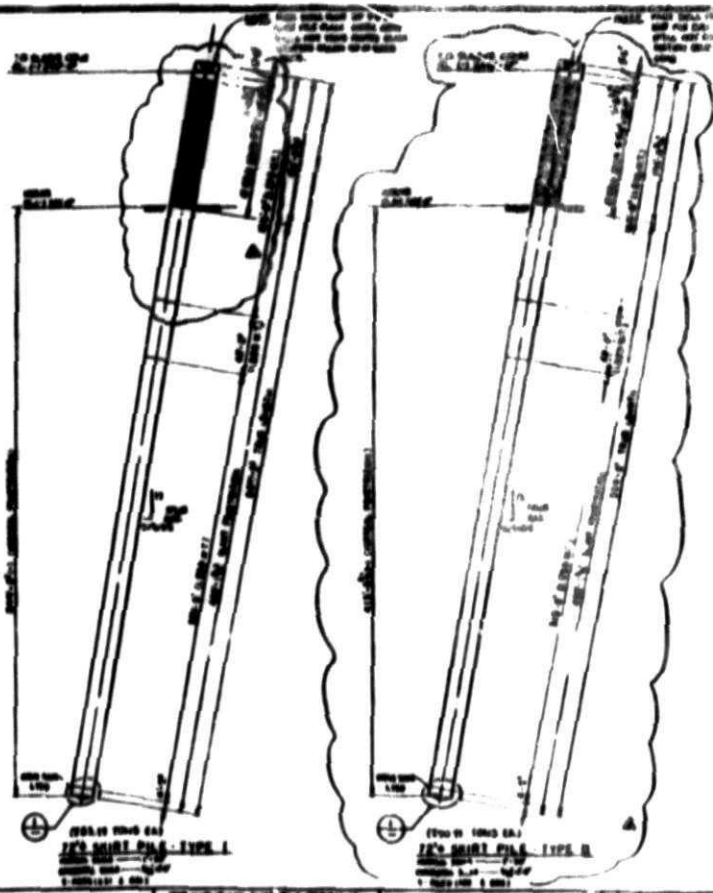
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<p>1. THIS DRAWING IS THE PROPERTY OF CBS ENGINEERING, INC. AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF CBS ENGINEERING, INC.</p>	<p>2. ALL DIMENSIONS ARE IN FEET AND INCHES UNLESS OTHERWISE SPECIFIED.</p>	<p>3. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE SPECIFIED.</p>	<p>4. ALL DIMENSIONS ARE TO CENTERLINE UNLESS OTHERWISE SPECIFIED.</p>	<p>5. ALL DIMENSIONS ARE TO CENTERLINE UNLESS OTHERWISE SPECIFIED.</p>	<p>6. ALL DIMENSIONS ARE TO CENTERLINE UNLESS OTHERWISE SPECIFIED.</p>	<p>7. ALL DIMENSIONS ARE TO CENTERLINE UNLESS OTHERWISE SPECIFIED.</p>
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CBS ENGINEERING, INC.
 Structural Steel
 1000 N. 10th St., Suite 100
 Phoenix, AZ 85003
 Phone: (602) 254-1111
 Fax: (602) 254-1112
 Website: www.cbseng.com

FOREST OIL CORPORATION
 1000 N. 10th St., Suite 100
 Phoenix, AZ 85003
 Phone: (602) 254-1111
 Fax: (602) 254-1112
 Website: www.forestoil.com

CC



BEST AVAILABLE COPY

AS BUILT

NO. 10 150

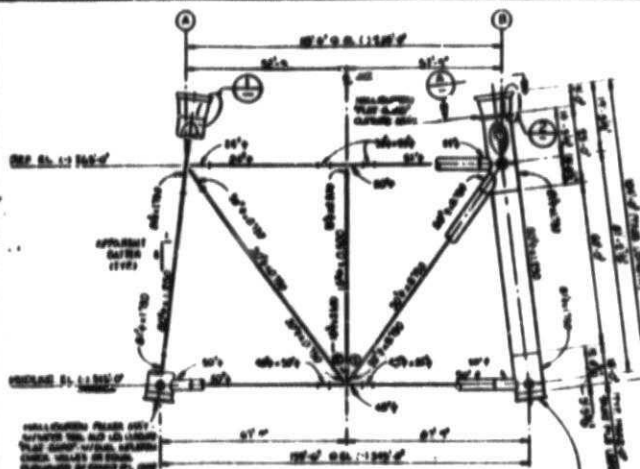
NOTES:
 1. FOR GENERAL NOTES SEE SET OF SPEC.
 2. SEE THAT THE SIGNS SHOW THE END OF PILE.
 3. DIMENSIONS & PILE DISTRIBUTION HERE TO BE GOVERNED BY INSTALLATION LOG.
 4. PILE POSITION MUST BE CHECKED FROM ALLEST OF ALL PILE CORNER POSITIONS.
 5. PILES MUST BE DRIVEN WITH THE CORNER POSITIONS.

NO.	DESCRIPTION	DATE	BY	CHECKED

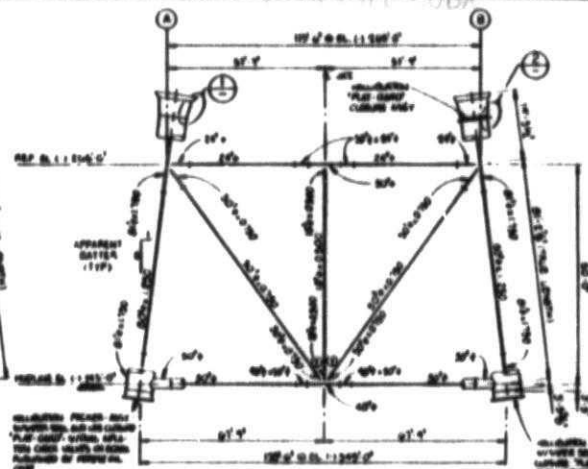


C&G ENGINEERING, INC.
 10000 100th Ave. N.E.
 Redmond, Wash. 98073
 TEL: (206) 881-1100
 FAX: (206) 881-1101

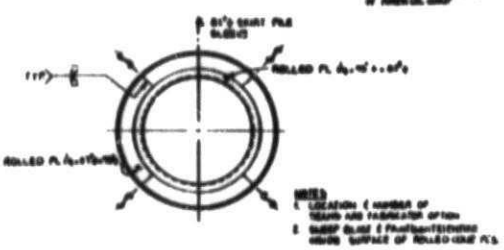
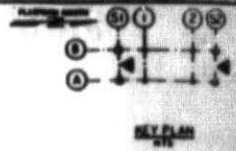
FOREST OIL CORPORATION
 10000 100th Ave. N.E.
 Redmond, Wash. 98073
 TEL: (206) 881-1100
 FAX: (206) 881-1101



ELEVATION AT ROW 51

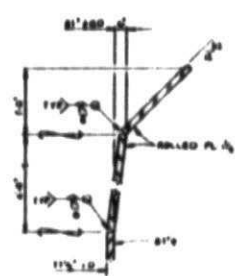


ELEVATION AT ROW 52

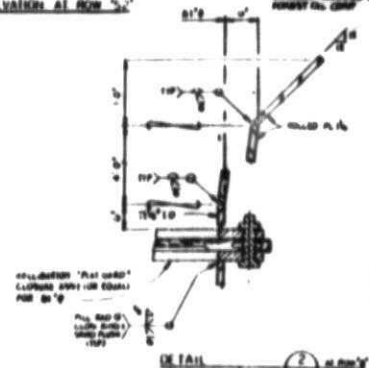


- NOTES
1. LOCATION & NUMBER OF TIEBARS AND TABULATION OF THEM.
 2. GAUGE BLEED & PROTECTIVE COATING INSIDE SURFACE OF ROLLED-IRON PLS.

1/4\"/>



DETAIL SCALE 1/4\"/>



DETAIL SCALE 1/4\"/>

AS BUILT

NOV 16 1930

1 1/2\"/>

BEST AVAILABLE COPY

REVISION	DATE	BY	REASON



CBS ENGINEERING, INC.
Houston, Texas

FOREST OIL CORPORATION
14 BENT BRILLING & FLETCHER PL. HOUSTON, TEXAS

PROJECT NO. 104 DATE 10/27/30
 DRAWN BY T. S. DATE 11/1/30
 CHECKED BY J. S. DATE 11/1/30
 SCALE 1/4\"/>

42-020



FOREST OIL CORPORATION

1201 Elmwood Park Blvd. • 909 Eighteenth Street
New Orleans, Louisiana 70123



June 5, 1992

Arvid Shah
Minerals Management Service
1201 Elmwood Park Blvd.
New Orleans, Louisiana 70123

Re: Platform Removal
E.I. 366 "A"

Dear Sir;

The following is a brief description of the piling sizes at the mud line and 15 feet below the mud line. There is a problem with one of the skirt pile grouting systems not allowing free access to 15 feet below the mud line. Forest is presently discussing this problem with the explosive companies and has included a discussion of some possible solutions.

The four main legs (60" X 1", ref. dwg. 1014, legs A1, A2, B1, and B2) do not have pilings.

Skirt sleeves (ref. dwg. 1014, sleeves A-S1, and B-S2, and B-S1) have a 72" diameter piles with 1.875" wall thickness material at the mud line and at 15 feet below the mud line.

Skirt sleeve B-S2 (platform NE) has a 72" diameter X 1.875 pile plus a 60" X 1.0" insert pile (ref. dwg. 1037), due to poor penetration of piling during installation. These sizes are the same at the mud line and at 15 feet below the mud line. The insert pile is grouted to the skirt pile with the grout distribution ring at approximately 15 feet below the mud line.

The grout distribution ring may cause some problems in the placement of the explosives in pile B-S2 to sever 15 feet below the mud line. I am presently discussing this problem with the explosive companies; however since this platform is located in a "Reef area" and will be toppled in place, would the MMS consider one of the two options;

- a. The use of explosives in the B-S2 pile as deep as possible, which may not be at the required 15 feet below the mud line, or

6/10/92

Told operator that the platform must be removed 15' BML

J.S.

Shah

page 2

- b. the severing of the platform legs just above the 265 foot level (just above the Skirt Sleeves) and leaving the bottom half of the structure in place in the reef area. The structure would still have over 200 feet of water cover and should pose as no problem to shipping. This option would of course be contingent upon Coast Guard approval.

NO

Should any additional information be necessary, please contact Cecil Colwell at 303/293-0460. Forest appreciates your assistance in this matter and will keep you abreast of any possible solutions in severing the B-S2 pile at the appropriate depth.

Regards,

Cecil N. Colwell
Cecil N. Colwell
Drilling Superintendent

APPENDIX B
MMS SUMMARY EVALUATION

RECEIVED

FEB 18 1992

**Minerals Management Service
Leasing & Environment**

In Reply Refer To: MS 5210

FEB 13 1992

Memorandum

To: Associate Director for Offshore Minerals Management (MS 4330)
(Attention: Chief, Environmental Operations and Analysis
Branch)

From: Regional Director, Gulf of Mexico OCS Region


Subject: Endangered Species Act Section 7 Consultation Relative to the
Proposed Removal by Forest Oil Corporation, Platform A, Eugene
Island Area, Block 366, Lease OCS-G 8700

The following attachments provide the documentation necessary to effect
an Endangered Species Act Section 7 Consultation with National Marine
Fisheries Service (NMFS):

1. Forest Oil Corporation's Structure Removal Application dated
January 29, 1992.
2. Gulf of Mexico OCS Region Summary Evaluation.

Forest Oil Corporation would like to accomplish the removal of this
platform in July 1992. Please inform NMFS of the necessity for an
expedient disposition.

We believe that by taking appropriate mitigating measures, Forest Oil
Corporation can accomplish the removal operation with a minimal risk to
any endangered marine species.

 (CHIEF) GARY L. LORE
J. Rogers Percy

Attachments

cc: National Marine Fisheries Service, Protected Species Management
Branch Attention: Dr. Terry Henwood, 9450 Roger Boulevard,
St. Petersburg, Florida 33702 (w/attachments)
1501-01a-2 (92-20) (MS 5210)
Lease OCS-G 8700 (MS 5032)
MS 5000 Reading File
MS 5001
MS 5440

Attachment: C: FORE5700

SUMMARY EVALUATION

Possible Effects on Endangered Species and Protected Marine Mammals from the Proposed Structure Removal of Platform A Eugene Island Area, South Addition, Block 366 (OCS-G 8700) ES/SR 92-020

Determination

Forest Oil Corporation (Forest) proposes to remove Platform A in Eugene Island Area, South Addition, Block 366. The Minerals Management Service (MMS) has determined that since the proposed operation will utilize explosives, sea turtles and marine mammals may be affected.

Background Information

Forest plans to use explosives to sever the four skirt piles and the four main piles of Platform A, at least 15 feet below the mud line. See Table 1 for specific data regarding the proposed explosive removal operation. Forest proposes to topple the structure in-place making an artificial reef. The lease expires in 1993.

The proposed activity does not meet the requirements for consideration under the generic structure-removal criteria as stated in the July 25, 1988, Biological Opinion from the National Marine Fisheries Service.

The following conditions and activities are noteworthy in this application:

1. The four skirt piles and the four main piles would be severed 15 ft. below the mud line.
2. The operator proposes to leave the jacket in place as an artificial reef and is currently petitioning the State of Louisiana with the proposition. The site is a recognized rigs-to-reef location.
3. A "marine mammal watch" will be performed 48 hours prior to and during the use of explosives. This will be done with representatives (observers) from the National Marine Fisheries Service in attendance.
4. High-velocity explosives are proposed.
5. Operations are proposed during July 1992.

Little information is available on the likelihood of encountering sea turtles or marine mammals during the proposed activities. However, both sea turtles and dolphins have been observed in the vicinity of other structure removals. Recent data indicate that sea turtles are distributed throughout offshore Gulf of Mexico waters. For this reason, it is possible that marine mammals and sea turtles may be present in the vicinity during the time of the proposed structure removal.

Mitigation

The following mitigative measures were identified by the operator in the application to remove Platform A to reduce the likelihood of death or injury to sea turtles and marine mammals.

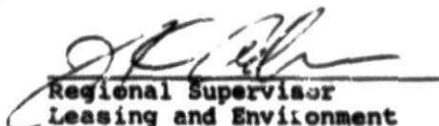
The operator proposes a 48 hour observation period for the National Marine Fisheries Service to look for sea turtles and other animals prior to and during explosive operations.

There are pipelines located within 150 meters (490 feet) of the proposed activities. Precautions in accordance with NTL 83-3, Section IV.B, will be taken prior to performing the proposed operations.

Summary

Sea turtles and marine mammals may be present in the vicinity of the structure during the proposed removal activities. If they are close enough, they may be hurt or killed by the detonation of explosives. Mitigative measures to be taken will reduce the probability of harming sea turtles or marine mammals. However, the proposed structure removal may affect sea turtles and protected marine mammals.

VB


Regional Supervisor
Leasing and Environment
Gulf of Mexico OCS Region

2/1/92
Date

Table 1

Explosives Proposed by Forest Oil Corporation
for the Structure Removal of
Platform A in Eugene Island Area, South Addition,
Block 356 (OCS-G 8700)

Type of Explosives

Composition B, C-4, Cyclotol or Octol, bulk charges.

Number and Size of Charges

Four, 75 lb. charges for each of the main piles.

Four, 100 lb. charges for each of the skirt piles.

Employment of Charges

Inside, 16 feet below the mud line for each of the piles.

Sequencing of Detonations

The four skirt pile charges will be detonated in one sequence with a 0.9 second delay between each charge, followed one minute later with detonation of the four main pile charges with a 0.9 second delay between each charge.

APPENDIX C
NMFS CORRESPONDENCE



92-20
J. J. King
UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
1335 East-West Highway
Silver Spring, MD 20910
THE DIRECTOR

APR 21 1992



~~ORD~~
ORD-1
FO
LE

Mr. J. Royce
Regional Director
Minerals Management Service
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Dear Mr. Pearcy:

This responds to your March 16, 1992, request for an Endangered Species Act (ESA) section 7 consultation for proposed removal by Forest Oil Corporation of Platform "A" in the Eugene Island Area, South Addition, Block 366. This expedited consultation has been designated number 67. The Summary Evaluation enclosed with your letter indicates that the proposed operation will utilize explosives, and that protected sea turtles and marine mammals may be affected.

The operator plans to remove the four pile structure with Composition B bulk charges; one 50 lb. charge for the A-1 and A-2 wells, one 40 lb. charge for the A-3 and A-4 wells, four 75 lb. charges for each of the four main piles, and four 100 lb. charges for each of the four skirt piles. Multiple charges will be set in sequence with a minimum of 0.9 seconds between detonations in an attempt to minimize the cumulative blast effects.

The National Marine Fisheries Service (NMFS) issued a "standard" Biological Opinion on July 25, 1988, addressing removal of structures in the Gulf of Mexico. Accounts of endangered and threatened species which occur in the project area, contained in the "standard" opinion also apply to this consultation and are hereby incorporated by reference.

Based upon the best available information concerning the frequency of occurrence of sea turtles in proximity to oil platforms and related structures, we believe that it is unlikely that a significant number of turtles will occur in the project area during detonation of the charge. Although the shock and impulse forces released into the marine environment as a result of the proposed action may result in the loss of individual sea turtles, it is our opinion that removal of this structure is not likely to jeopardize the continued existence of threatened and endangered species that are the responsibility of NMFS. However, we have determined that the proposed activity may result in the injury or mortality of loggerhead, Kemp's ridley, green, hawksbill and leatherback sea turtles. Therefore, pursuant to section 7(b)(4) of the ESA, we have established a low

THE ASSISTANT ADMINISTRATOR
FOR FISHERIES



APR 28 1992

level of incidental take, terms, and conditions necessary to minimize and monitor this impact. These terms and conditions are contained in the enclosed incidental take statement. Compliance with the specified terms and conditions is the responsibility of the Forest Oil Corporation or the Minerals Management Service.

Consultation must be reinitiated if: (1) the amount or extent of taking specified in the incidental take statement is exceeded; (2) new information reveals the project that may affect listed species in an extent not considered thus far, in our opinion; (3) specified activities are modified in a manner that cause a adverse effect to listed species not previously considered; (4) a new species is listed or critical habitat is designated that may be affected by the project.

I look forward to your continued cooperation in future consultations.

Sincerely,



(for) William W. Fox, Jr.

Enclosure

Incidental Take Statement

Section 7(b)(4) of the Endangered Species Act (ESA) requires that when a proposed agency action is found to be consistent with section 7(a)(2) of the ESA, and the proposed action may incidentally take individuals of listed species, the National Marine Fisheries Service (NMFS) will issue a statement that specifies the impact (amount or extent) of such incidental taking. Incidental taking by the Federal agency or applicant that complies with the specified terms and conditions of this statement is authorized and exempt from the taking prohibition of the ESA.

Based on stranding records, incidental captures aboard commercial shrimp vessels and historical data, five species of sea turtles are known to occur in the northern Gulf of Mexico waters. Current available information on the relationship between sea turtle mortality and the use of high-velocity explosives to remove oil platforms indicates that injury and/or death of sea turtles may result from the proposed action. Therefore, pursuant to section 7(b)(4) of the ESA, an incidental take (by injury or mortality) of one documented Kemp's ridley, green, hawksbill or leatherback sea turtle or two loggerhead sea turtles is set for this removal. If the incidental take meets or exceeds this level, the Minerals Management Service (MMS) must reinstate consultation. NMFS Southeast Region will cooperate with MMS in the review of the incident to determine the need for developing further mitigation measures.

The reasonable and prudent measures that NMFS believes are necessary to minimize the impact of incidental takings have been discussed with MMS and are incorporated in the platform removal design. The following terms and conditions are established for this removal to implement these measures and to document the incidental take should such take occur:

1. Qualified observer(s), as approved by NMFS, must be used to monitor the area around the site before, during, and after detonation of the charges. Surface observations must be conducted for as long a time as possible before removal of the structure (48 hours is recommended).
2. On the day of the blast, a 30-minute aerial survey must be conducted within 1 hour before and 1 hour after detonation. This survey should encompass all waters within 1 mile of the structure. A qualified observer must be used to check for the presence of turtles and, if possible, to identify species. If weather conditions (fog, excessive winds, etc.) make it impossible to conduct the aerial survey, blasting

activities may be allowed to proceed if approved by the designated NMFS and MMS representatives on site.

3. If sea turtles are observed in the vicinity of the platform (within 1,000 yards of the site) prior to detonating the charge, blasting will be delayed until attempts are successful in removing them at least 1,000 yards from the blast site. The aerial survey must be repeated prior to resuming detonation of charges.
4. Detonation of explosives will occur no sooner than 1 hour following sunrise and no later than 1 hour before sunset. However, if it is determined by MMS and/or NMFS on-site representatives that special circumstances justify a modification of these time restrictions and that modification is not likely to adversely impact listed species, the blast may be allowed to proceed outside of this time frame.
5. During all diving operations (working dives as required in the course of the removal), divers will be instructed to watch for turtles and marine mammals. Any sightings must be reported to MMS and/or NMFS on-site representatives. Upon completion of blasting, divers must report and attempt to recover any sighted, injured, or dead sea turtles or marine mammals.
6. The use of scare charges should be avoided to minimize the "chumming effect." Use of scare charges may be allowed only if approved by MMS and/or NMFS on-site representatives.
7. A report summarizing the results of the removal and mitigation measures must be submitted to the MMS Gulf of Mexico Region within 15-working days of the removal. This report should include an evaluation of the effectiveness of charge(s) used, and a determination as to whether this removal could have been accomplished using less explosives. A copy of the report must be forwarded to NMFS Southeast Region.

This incidental take statement applies only to endangered and threatened sea turtles. In order to allow an incidental take of a marine mammal species, the taking must be authorized under section 101(a)(5) of the Marine Mammal Protection Act of 1972. Although interest has been expressed in obtaining an exception authorizing a limited take of dolphins incidental to abandonment activities, no marine mammal take is authorized until appropriate small take regulations are in place and "Letters of Authorization" are issued.