

UNITED STATES GOVERNMENT
MEMORANDUM

December 18, 2018

To: Public Information (MS 5030)
From: Plan Coordinator, FO, Plans Section (MS
5231)

Subject: Public Information copy of plan

Control # - S-07922

Type - Supplemental Development Operations Coordinations Document

Lease(s) - OCS-G02112 Block - 315 Eugene Island Area
OCS-G02912 Block - 329 Eugene Island Area

Operator - Fieldwood Energy LLC

Description - Well A019 (EI 329) and revision of air emissions for
Platform A (EI 315)

Rig Type - Not Found

Attached is a copy of the subject plan.

It has been deemed submitted as of this date and is under review for approval.

Madonna Montz
Plan Coordinator

Site Type/Name	Botm Lse/Area/Blk	Surface Location	Surf Lse/Area/Blk
FIXED/A		250 FSL, 250 FEL	G02112/EI/315
WELL/A019	G02912/EI/329	293 FSL, 253 FEL	G02112/EI/315



November 12, 2018

Bureau of Ocean Energy Management
Office of Leasing and Plans
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

Attn: Michelle Uli
Chief, Plans Section

Subject: Supplemental Development Operations Coordination Document
Fieldwood Energy LLC
Eugene Island Blocks 329 and 315
Leases OCS-G02912 and OCS-G02112, respectively

In accordance with 30 CFR 550.200 Subpart B and NTL 2008-G04, Fieldwood Energy LLC (Fieldwood) hereby submits for your review and approval a Supplemental Development Operations Coordination Document for the drilling, completion and commencement of production of a new well from existing surface location in Lease OCS-G02112, Well No. A019 (ST00 BP00) in Eugene Island Block 315. Please note, this well will have a bottom location in Lease OCS-G02912, Eugene Island Block 329.

Fieldwood respectfully requests an expedited review of this plan. The Ensco 68 was planned to be under contract with Fieldwood beginning April 1, 2019, however the current Operator who has the rig is suspending their operations in February 2019 and Fieldwood was presented the option to obtain the rig at that time.

Enclosed you will find one Proprietary Copy and one Public Copy with a CD containing electronic copies of the plan.

If you should have any questions or concerns, please contact me, Ali Ferguson by phone at 713-969-1308 or by e-mail at ali.ferguson@fwelc.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ali Ferguson', with a long horizontal flourish extending to the right.

Ali Ferguson
Regulatory Specialist

**SUPPLEMENTAL
DEVELOPMENT OPERATIONS COORDINATION
DOCUMENT**

PUBLIC Information Copy

**Eugene Island Blocks 329 and 315
Leases OCS-G02912 and OCS-G02112**

Submitted by: Fieldwood Energy LLC



Fieldwood Energy LLC

SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

Eugene Island Blocks 329 and 315

Leases OCS-G02912 and OCS-G02112

SECTION A	<i>Plan Contents</i>
SECTION B	<i>General Information</i>
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SECTION D	<i>H2S Information</i>
SECTION E	<i>Mineral Resources Conservation Information</i>
SECTION F	<i>Biological, Physical and Socioeconomic Information</i>
SECTION G	<i>Wastes and Discharge Information</i>
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SECTION P	<i>Coastal Zone Management Act (CZMA) Information</i>
SECTION Q	<i>Environmental Impact Analysis</i>
SECTION R	<i>Administrative Information</i>

SECTION A
PLAN CONTENTS

(a) Plan Information Form

This Supplemental Development Operations Coordination Document (SDOCD) is being submitted for the drilling, completion and production of Well No. A019 (ST00 BP00) in Lease OCS-G02912, Eugene Island Block 329 with an expected spud date of February 1, 2019. Please note that this well will have a surface location in Lease OCS-G02112, Eugene Island Block 315.

See attached OCS Plan Information Form, Form BOEM-137, included under this section showing the proposed activity schedule (**Attachment A-1**).

(b) Location

A Well Location Map showing the surface (**Attachment A-2**) location of the proposed well is included in this plan along with a Bathymetry Map (**Attachment A-3**) showing the water depths across the lease block.

(c) Safety and Pollution Prevention Features

Fieldwood will use a jack-up rig with surface BOPs, and will comply with all of the regulations of the ABS, IMO and USCG. All drilling operations will be conducted under the provisions of 30 CFR, Part 250, Subpart D, and other applicable regulations and notice to lessees, including those regarding the avoidance of potential drilling hazards and safety and pollution prevention control. Such measures as inflow detection and well control, monitoring for loss of circulation and seepage loss, and casing design will be our primary safety measures.

Pollution prevention measures include installation of curbs, gutters, drip pans, and drains on drilling deck areas to collect all contaminants and debris. All discharges will be in accordance with applicable EPA NPDES permits.

(d) Storage Tanks and Production Vessels

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of Tanks	Total Capacity (bbls)	Fluid Gravity (API)
Fuel Oil (Marine Diesel)	Jack-Up Rig	7,531	1	7,531	29.295 - 45.375
Liquid Mud	Jack-Up Rig	1,689	1	1,689	--
Bulk Mud	Jack-Up Rig	2,720	1	2,720	--
Drill Water	Jack-Up Rig	9,727	1	9,727	--

Potable Water	Jack-Up Rig	1,295	1	1,295	--
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All facility tanks of 25 barrels or more.

(e) Processing Fee

A Pay.gov receipt is being included in this plan (**Attachment A-4**) in the amount of \$4,238.00 to cover the cost and processing fee for the proposed operations being conducted under this plan.

(f) Pollution Prevention Measures

Pursuant to NTL 2008-G04 the proposed operations covered by this SDOCD do not require Fieldwood to specifically address the discharges of oils and greases from the rig during rainfall or routine operations. Nevertheless, Fieldwood has provided this information as part of its response to (c) above.

(g) Additional Measures

Health, safety, and environment are the primary topics in pre-tour and pre-job safety meetings. The discussion around no harm to people or environment is a key mindset. All personnel are reminded daily to inspect work areas for safety issues as well as potential pollution issues.

Attachments

- 1) Form BOEM-137 (*Attachment A-1*)
- 2) Surface Location Map (*Attachment A-2*)
- 3) Bathymetry Map (*Attachment A-3*)
- 4) Pay.Gov Receipt (*Attachment A-4*)

OCS PLAN INFORMATION FORM

General Information									
Type of OCS Plan:		Exploration Plan (EP)		Development Operations Coordination Document (DOCD)				SDOCD	
				Supplemental DOCD					
Company Name: Fieldwood Energy LLC				BOEM Operator Number: Operator No. 03295					
Address:				Contact Person: Ali Ferguson					
2000 W. Sam Houston Pkwy South, Suite 1200				Phone Number: 713-969-1308					
Houston, TX 77042				E-Mail Address: ali.ferguson@fwelc.com					
If a service fee is required under 30 CFR 550.125(a), provide the				Amount paid		\$4,238.00		Receipt No.	
								26DCH24N	
Project and Worst Case Discharge (WCD) Information									
Lease(s): G02112			Area: E1		Block: 15		Project Name (If Applicable):		
Objective(s)	<input checked="" type="checkbox"/>	Oil	<input type="checkbox"/>	Gas	<input type="checkbox"/>	Sulphur	<input type="checkbox"/>	Salt	Onshore Support Base(s): Grand Isle: Fieldwood Energy Dock
Platform/Well Name: A019 (ST00BP00)			Total Volume of WCD: 26,267				API Gravity: 31.5 degrees		
Distance to Closest Land (Miles): 79.5				Volume from uncontrolled blowout: 18,736					
Have you previously provided information to verify the calculations and assumptions for your WCD?							Yes	<input checked="" type="checkbox"/>	No
If so, provide the Control Number of the EP or DOCD with which this information was provided									
Do you propose to use new or unusual technology to conduct your activities?							Yes	<input checked="" type="checkbox"/>	No
Do you propose to use a vessel with anchors to install or modify a structure?							Yes	<input checked="" type="checkbox"/>	No
Do you propose any facility that will serve as a host facility for deepwater subsea development?							Yes	<input checked="" type="checkbox"/>	No
Description of Proposed Activities and Tentative Schedule (Mark all that apply)									
Proposed Activity				Start Date		End Date		No. of Days	
Exploration drilling									
Development drilling				02/01/2019		03/02/2019		30	
Well completion				03/03/2019		03/22/2019		20	
Well test flaring (for more than 48 hours)									
Installation or modification of structure									
Installation of production facilities									
Installation of subsea wellheads and/or manifolds									
Installation of lease term pipelines									
Commence production				03/23/2019					
Other (Specify and attach description)									
Description of Drilling Rig					Description of Structure				
<input checked="" type="checkbox"/>	Jackup		Drillship		<input type="checkbox"/>	Caisson		Tension leg platform	
<input type="checkbox"/>	Gorilla Jackup		Platform rig		<input checked="" type="checkbox"/>	Fixed platform		Compliant tower	
<input type="checkbox"/>	Semisubmersible		Submersible		<input type="checkbox"/>	Spar		Guyed tower	
<input type="checkbox"/>	DP Semisubmersible		Other (Attach Description)		<input type="checkbox"/>	Floating production system		Other (Attach Description)	
Drilling Rig Name (If Known): Ensco 68									
Description of Lease Term Pipelines									
From (Facility/Area/Block)			To (Facility/Area/Block)			Diameter (Inches)		Length (Feet)	

OCS PLAN INFORMATION FORM (CONTINUED)
Include one copy of this page for each proposed well/structure

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): A019				Previously reviewed under an approved EP or DOCD?		Yes	<input checked="" type="checkbox"/>	No	
Is this an existing well or structure?		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	If this is an existing well or structure, list the Complex ID or API No.			
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						Yes	<input checked="" type="checkbox"/>	No	
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 18,736			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid		31.5 degrees
Surface Location				Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS OCS-G02112			OCS			OCS OCS		
Area Name	Eugene Island								
Block No.	315								
Blockline Departures (in feet)	N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L		
	293'						N/S Departure: F <u> </u> L		
	E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L		
	253'						E/W Departure: F <u> </u> L		
Lambert X-Y coordinates	X: 1,894,592			X:			X:		
	Y: -150,273			Y:			Y:		
Latitude/ Longitude	Latitude 28° 15' 11.042" N			Latitude			Latitude		
	Longitude -91° 39' 38.178" W			Longitude			Longitude		
Water Depth (Feet): 240'				MD (Feet):		TVD (Feet):		MD (Feet):	
Anchor Radius (if applicable) in feet:				N/A				TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor		
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				

OCS PLAN INFORMATION FORM (CONTINUED)
Include one copy of this page for each proposed well/structure

Proposed Well/Structure Location										
Well or Structure Name/Number (If renaming well or structure, reference previous name): Platform A				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.			Complex ID No. 22637	
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	
WCD info	For wells, volume of uncontrolled blowout (Bbls/day):			For structures, volume of all storage and pipelines (Bbls): 0			API Gravity of fluid N/A			
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)			
Lease No.	OCS OCS-G02112			OCS			OCS OCS			
Area Name	Eugene Island									
Block No.	315									
Blockline Departures (in feet)	N/S Departure: F <u> </u> S <u> </u> L <u> </u>		250'		N/S Departure: F <u> </u> L <u> </u>		N/S Departure: F <u> </u> L <u> </u>		N/S Departure: F <u> </u> L <u> </u>	
	E/W Departure: F <u> </u> E <u> </u> L <u> </u>		250'		E/W Departure: F <u> </u> L <u> </u>		E/W Departure: F <u> </u> L <u> </u>		E/W Departure: F <u> </u> L <u> </u>	
Lambert X-Y coordinates	X: 1,894,594.88			X:			X: X: X:			
	Y: -150,316.24			Y:			Y: Y: Y:			
Latitude/ Longitude	Latitude 28.252949			Latitude			Latitude Latitude Latitude			
	Longitude -91.660595			Longitude			Longitude Longitude Longitude			
Water Depth (Feet): 240'				MD (Feet):		TVD (Feet):		MD (Feet): MD (Feet):		TVD (Feet): TVD (Feet):
Anchor Radius (if applicable) in feet:					N/A			MD (Feet): TVD (Feet):		
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)										
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor					
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						

SUPPLEMENTAL DOCD
EI-315 OCS-G- 02112 & EI-329 OSC-G-02912

EI-315

EI-316

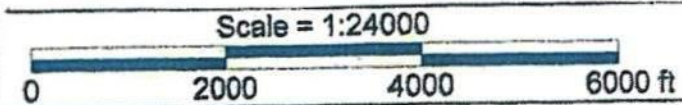
SL: 293 FSL & 253 FEL OF Eugene Island Block 315

Surface: X= 1,894,592' Y= -150,273

Surface: LAT. 28 deg. 15' 11.042" N LONG -91 deg. 39' 38.178" W

"A" PLATFORM
PROPOSED A-19 WELL

329



315

329

Surface Loc. Prop. A-19

240'

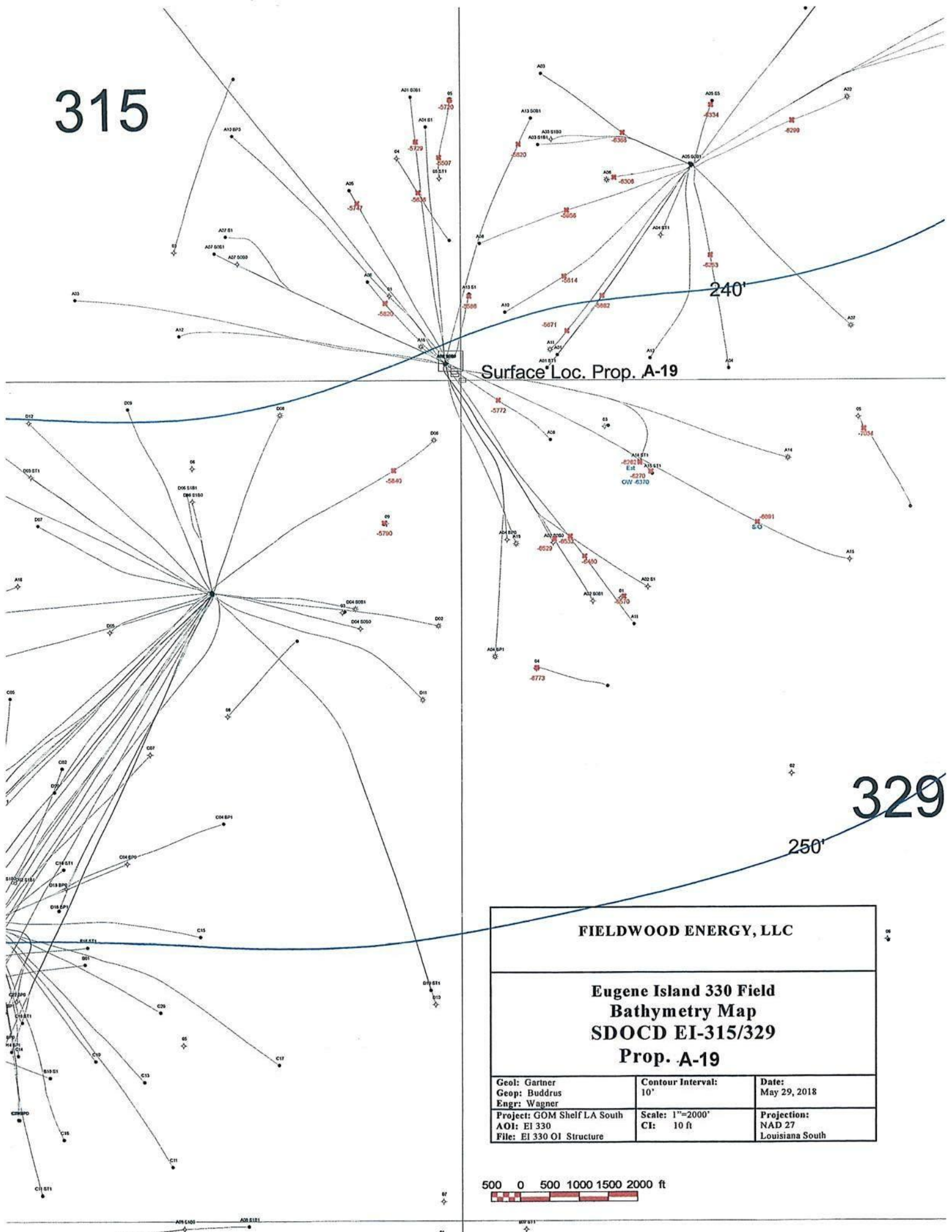
250'

FIELDWOOD ENERGY, LLC

Eugene Island 330 Field
Bathymetry Map
SDOCD EI-315/329
Prop. A-19

Geol: Gartner	Contour Interval: 10'	Date: May 29, 2018
Geop: Buddrus		
Engr: Wagner		
Project: GOM Shelf LA South	Scale: 1"=2000'	Projection: NAD 27
AOI: EI 330	CI: 10 ft	Louisiana South
File: EI 330 OI Structure		

500 0 500 1000 1500 2000 ft





Receipt

Tracking Information

Pay.gov Tracking ID: 26DCH24N

Agency Tracking ID: 75611431941

Form Name: BOEM Development Operations Coordination Document or DPP

Application Name: BOEM Development/DOCD Plan - BD

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$4,238.00

Transaction Date: 11/07/2018 10:49:02 PM EST

Payment Date: 11/07/2018

Region: Gulf of Mexico

Contact: Ali Ferguson 713-969-1308

Company Name/No: Fieldwood Energy LLC, 03295

Lease Number(s): 02912, 02112, , ,

Area-Block: Eugene Island EI, 329: Eugene Island EI, 315: , : , ,

Type-Wells: Supplemental Plan, 1

Account Information

Cardholder Name: Fieldwood Energy LLC

Card Type: Master Card

Card Number: *****8170

SECTION B
GENERAL INFORMATION

(a) Applications and Permits

No additional applications or permits from other agencies are required at this time to be submitted and approved other than an Application for Permit to Drill (APD) to the Lafayette BSEE District.

(b) Drilling Fluids

Type of Drilling Fluid	Estimated Volume of Drilling Fluid
Water-based (fluids generated while using water-based drilling fluids)	16,954 bbls
Cuttings wetted with water-based fluid (cuttings generated while using water-based drilling fluid)	2,082 bbls

(c) Production

Proprietary Information.

(d) Oils Characteristics

Per NTL 2008-G04, oil characteristics information is not required.

(e) New or Unusual Technology

Fieldwood does not plan to use any new or unusual technology for the proposed operations being conducted under this plan.

(f) Bonding Statement, oil spill financial responsibility, and well control statements

The bond requirements for the activities and facilities proposed in this SDOCD are satisfied by a \$3,000,000.00 area-wide bond, furnished and maintained according to 30 CFR 556.901; NTL No. 2015-BOEM-N04 "General Financial Assurance;" and additional security under 30 CFR 556.901 (d) - (f) and NTL No. 2016-BOEM N01, "Requiring Additional Security."

(g) Oil Spill Financial Responsibility (OSFR)

Fieldwood Energy (BOEM company number 03295) has demonstrated oil spill financial responsibility for the facilities proposed in this SDOCD according to 30 CFR Part 253; and NTL No. 2008-N05, "Guidelines for Oil Spill Financial Responsibility for Covered Facilities." Fieldwood will have the financial capability to drill a relief well and conduct any other emergency well control operation.

(h) Deepwater Well Control Statement

N/A.

(i) Suspensions of Production

Leases OCS-G02912 and OCS-G02112 are held by prior production. Fieldwood has not filed and does not anticipate filing any requests for Suspensions of Production from either lease.

(j) Blowout Scenario

The proposed A019 well has an estimated flow rate of 18,736 barrels per day. The expected duration of a blowout, should it occur, is approximately 60 days. The calculated volume on a 60-day blowout is 1,124,160 barrels per day.

The duration of the blowout will be a function of the well bridging over; the ability of surface intervention; or as a last resort, drilling a relief well. The expected timeframes for the different outcomes would be:

- 1) Bridging over: 2 to 3 days
- 2) Surface intervention: 7 to 14 days
- 3) Relief well: 65 days

Discussion of potential for well to bridge over

The EI 329 A019 well is an abnormal pressured oil well; the primary target is an unconsolidated oil sand. A pressure drop caused by an uncontrolled blowout would result in formation failure and a reasonably high chance of bridging over. Typical Gulf of Mexico (GOM) wells usually result in a strong chance of sanding up or bridging over due to the high amount of solids that would be produced resulting from formation collapse as the pressure in the wellbore is reduced. It is typically expected to take 24 - 48 hours to bridge over. Bridging over is the common outcome of conventional GOM wells. This is usually the period where equipment is being moved to location for a surface intervention.

Discussion of likelihood for surface intervention to stop blowout

Surface intervention would be viable as long as the surface wellhead and tree are not damaged beyond use. If the blowout results in a fire which destroys the surface equipment, surface intervention could be limited or not an option. Surface intervention would be the first line of defense after a blowout occurs - the actual intervention technique chosen will be dependent on actual conditions and ability to access the existing well. There can be simple solutions such as rig up and set a plug in the casing or more complex solutions such as stabbing over a new BOP and closing the well. The actual solution will depend on actual conditions. A surface intervention is faster than a relief well and is usually started as conditions permit and can be done while relief well planning is being conducted. Fieldwood Energy would immediately consult with a well control company (Wild Well or Boots and Coats) and begin surface intervention planning

and relief well planning. Typical blowouts can be controlled with surface intervention. The easy access to the surface wellhead and BOP makes this option viable in most cases.

Discussion of relief well

Name of Specific rig identified for relief well

The Rowan EXL III is a specific rig that could drill the relief well. The water depth is 240' which will limit rig selection to 350' rated rigs or greater. The Rowan EXL III rated to 350' WD.

Rig under contract

Fieldwood Energy LLC does not currently have a rig under contract.

Rig package constraints

The water depth is 240' which will limit rig selection to a 350' or greater IC jack-up rig.

Estimated time to drill relief well: 65 days.

Time to acquire rig and move onsite: 10 days will be required to acquire the rig, make it available for tow, and tow it onsite (it may have to suspend operations that are currently ongoing).

Drilling time: 55 days

Statement whether the possibility of using a nearby platform was considered, if feasible

It is preferred to drill relief wells from an open water location rather than a platform location; it gives the best option on designing a simple intercept well and allows a greater choice on rig availability.

Measures to enhance ability to prevent and to reduce the likelihood of a blowout

The key to preventing blowouts is early detection. Using good oil field practices will minimize blow out risks. Keeping the BOPs in good working condition is the first step. Monitoring during the drilling process is key to early detection, watching for flow increases and or pit gains, checking for flow on connections, maintaining the MW correctly, utilizing a trip tank on all trips are all part of a successful strategy to catch kicks early and properly handling a small kick is much easier than successfully circulating out a large kick. Keeping all rig personnel properly trained in how to respond to well control events is also part of a successful strategy. This starts at the lowest level - the man on the shaker is the first to see flow change - the driller must be confident that when there is doubt, shut it in and figure it out after it's shut in. This keeps kick sizes small. Other blowouts can occur during the non-drilling phase; flow after cementing is a common issue - utilizing good cementing techniques, designing a cement slurry with additives that help to prevent flow after cementing, and following good practices can prevent this. This is an abnormal pressured well and we will utilize a liner top packer.

Measure to enhance ability to conduct effective and early intervention in the event of a blowout

Fieldwood Energy LLC has a working relationship with several well control experts, Wild Well, Cudd, and Boots and Coots. They would be brought in to provide expert advice on implementing surface intervention and provide onsite supervision to any operation. Surface intervention equipment is readily available - rental BOPs and skid units for pumping.

Arrangements for drilling relief wells

Fieldwood Energy LLC has a working relationship with several well control experts, Wild Well, Cudd, and Boots and Coots. They would be brought in to provide expert advice on drilling a relief well. We (ex-Apache now Fieldwood Energy LLC) have utilized Baker Inteq on most of our directional wells and they have provided technical support in the 3 relief wells that we have successfully drilled in the past. Fieldwood Energy LLC will typically have a jack-up rig under contract that could be made available to drill a relief well. We have successfully drilled relief wells in the past.

SECTION C
GEOLOGICAL AND GEOPHYSICAL INFORMATION

(a) Geologic Description

Proprietary Information.

(b) Structure Contour Map(s) and (c) Interpreted Seismic Lines

Proprietary Information.

(d) Geological Structure Cross-Sections

Proprietary Information.

(e) Shallow Hazards Report

The proposed operations will be conducted from a previously approved surface location; therefore, a shallow hazards report is not being submitted under this plan.

(f) Shallow Hazards Assessment

A shallow hazards analysis evaluating any seafloor and subsurface geologic and manmade features and conditions for the existing locations was included with a previously approved plan.

(g) High Resolution Seismic Lines

The proposed operations will be conducted from a previously approved surface location; therefore, annotated high-resolution survey lines are not being submitted under this plan.

(h) Stratigraphic Column

Proprietary Information.

(i) Time vs Depth Tables

Proprietary Information.

SECTION D
HYDROGEN SULFIDE INFORMATION

(a) Concentration

Fieldwood does not anticipate encountering any H₂S during the proposed operations.

(b) Classification

In accordance with Title 30 CFR 250.490(c), Fieldwood requests Eugene Island Block 329 to be classified by BSEE as H₂S absent.

There has been no reported existence of H₂S at Eugene Island Block 329. This include the shallowest production from the EI 329 A018 well at 1,408' TVD from the AA-4 Sand in the Middle Pleistocene to the EI 329 A015 ST well at 7,279' TVD producing from the L-10 Sand in Lower Pleistocene section.

(c) Contingency Plan

Fieldwood does not anticipate encountering H₂S while conducting our proposed development activities.

(d) Modeling Report

Fieldwood does not anticipate encountering H₂S while conducting our proposed development activities therefore a modeling report is not required at this time.

SECTION E
MINERAL RESOURCE CONSERVATION INFORMATION

(a) Technology & Reservoir Engineering Practices and Procedures

Proprietary Information.

(b) Technology and Recovery Practices and Procedures

Proprietary Information.

(c) Reservoir Development

Proprietary Information.

SECTION F
BIOLOGICAL, PHYSICAL AND SOCIOECONOMIC INFORMATION

The proposed activities being conducted under this revised plan are from an existing surface location; therefore, this section is not being provided.

SECTION G
WASTES AND DISCHARGES INFORMATION

(a) Projected Generated Wastes and (b) Projected Ocean Discharges

Type of Fluid	Estimated Volume of Fluid	Discharge Method
Water-based (fluids generated while using water-based drilling fluids)	16,954 bbls	Overboard (not to exceed 1,000 bbls per hour)
Cuttings wetted with water-based fluid (cuttings generated while using water-based drilling fluid)	2,082 bbls	Overboard (not to exceed 1,000 bbls per hour)

(c) Modeling Report

Not required by EPA under the OCS General Permit.

SECTION H
AIR EMISSIONS INFORMATION

(a) Emissions Worksheets and Screening Questions

(1) Emissions Worksheets

Enclosed (**Attachment H-1**) are one set of emissions worksheets showing the emissions calculations for the Plan Emissions, and a set of worksheets showing the emissions calculations for the Complex Total emissions.

(2) Screening Questions

Screen Procedures for DOCDs	Yes	No
Is any calculated Complex Total (CT) Emission amount (tons) associated with your proposed development activities more than 90% of the amounts calculated using the following formulas: $CT = 3400D^{2/3}$ for CO, and $CT = 33.3D$ for the other air pollutants (where D = distance to shore in miles)?		X
Do your emission calculations include any emission reduction measures or modified emission factors?		X
Does or will the facility complex associated with your proposed development and production activities process production from eight or more wells?		X
Do you expect to encounter H ₂ S at concentrations greater than 20 parts per million (ppm)?		X
Do you propose to flare or vent natural gas in excess or criteria set for the under 250.1105(a)(2) and (3)?		X
Do you propose to burn produced hydrocarbon liquids?		X
Are your proposed development and production activities located within 25 miles (40 kilometers) from shore?		X
Are your proposed development and production activities located within 124 miles (200 kilometers) of the Breton Wilderness Area?		X

This information was calculated by: Ali Ferguson
(713) 969-1308
ali.ferguson@fwellc.com

Attachments

1) Air Emissions Worksheets (*Attachment H-1*)

DOCD AIR QUALITY SCREENING CHECKLIST

OMB Control No. 1010-0151
 OMB Approval Expires: 06/30/2021

COMPANY	Fieldwood Energy LLC
AREA	Eugene Island
BLOCK	315
LEASE	G02112
PLATFORM	A
WELL	N/A
COMPANY CONTACT	Ali Ferguson
TELEPHONE NO.	713-969-1308
REMARKS	Drilling, Completion, and Production of new well EI 329 A019

LEASE TERM PIPELINE CONSTRUCTION INFORMATION:		
YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS
2019	0	
2020-2028		

AIR EMISSIONS COMPUTATION FACTORS

Fuel Usage Conversion Factors	Natural Gas Turbines		Natural Gas Engines		Diesel Recip. Engine		REF.	DATE
	SCF/hp-hr	9.524	SCF/hp-hr	7.143	GAL/hp-hr	0.0483	AP42 3.2-1	4/76 & 8/84

Equipment/Emission Factors	units	PM	SOx	NOx	VOC	CO	REF.	DATE
NG Turbines	gms/hp-hr		0.00247	1.3	0.01	0.83	AP42 3.2-1& 3.1-1	10/96
NG 2-cycle lean	gms/hp-hr		0.00185	10.9	0.43	1.5	AP42 3.2-1	10/96
NG 4-cycle lean	gms/hp-hr		0.00185	11.8	0.72	1.6	AP42 3.2-1	10/96
NG 4-cycle rich	gms/hp-hr		0.00185	10	0.14	8.6	AP42 3.2-1	10/96
Diesel Recip. < 600 hp.	gms/hp-hr	1	0.1835	14	1.12	3.03	AP42 3.3-1	10/96
Diesel Recip. > 600 hp.	gms/hp-hr	0.32	0.1835	11	0.33	2.4	AP42 3.4-1	10/96
Diesel Boiler	lbs/bbl	0.084	0.3025	0.84	0.008	0.21	AP42 1.3-12,14	9/98
NG Heaters/Boilers/Burners	lbs/mmscf	7.6	0.593	100	5.5	84	AP42 1.4-1, 14-2, & 14-3	7/98
NG Flares	lbs/mmscf		0.593	71.4	60.3	388.5	AP42 11.5-1	9/91
Liquid Flaring	lbs/bbl	0.42	6.83	2	0.01	0.21	AP42 1.3-1 & 1.3-3	9/98
Tank Vapors	lbs/bbl				0.03		E&P Forum	1/93
Fugitives	lbs/hr/comp.				0.0005		API Study	12/93
Glycol Dehydrator Vent	lbs/mmscf				6.6		La. DEQ	1991
Gas Venting	lbs/scf				0.0034			

Sulphur Content Source	Value	Units
Fuel Gas	3.33	ppm
Diesel Fuel	0.05	% weight
Produced Gas(Flares)	3.33	ppm
Produced Oil (Liquid Flaring)	1	% weight

AIR EMISSIONS CALCULATIONS - FIRST YEAR

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL		CONTACT				PHONE	REMARKS					
Fieldwood Energy LLC	Eugene Island	315	G02112	A	N/A		Ali Ferguson				713-969-1308	Drilling, Completion, and Production of new well EI 329 A019					
OPERATIONS	EQUIPMENT		RATING	MAX. FUEL	ACT. FUEL	RUN TIME		MAXIMUM POUNDS PER HOUR					ESTIMATED TONS				
	Diesel Engines		HP	GAL/HR	GAL/D												
	Nat. Gas Engines		HP	SCF/HR	SCF/D												
Burners		MMBTU/HR	SCF/HR	SCF/D	HR/D	D/YR	PM	SOx	NOx	VOC	CO	PM	SOx	NOx	VOC	CO	
DRILLING	PRIME MOVER>600hp diesel		16975	819.8925	19677.42	24	50	11.96	6.86	411.29	12.34	89.74	7.18	4.12	246.77	7.40	53.84
	VESSELS>600hp diesel(crew)		2265	109.3995	2625.59	10	21	1.60	0.92	54.88	1.65	11.97	0.17	0.10	5.76	0.17	1.26
	VESSELS>600hp diesel(supply)		2265	109.3995	2625.59	10	21	1.60	0.92	54.88	1.65	11.97	0.17	0.10	5.76	0.17	1.26
	VESSELS>600hp diesel(tugs)		4400	212.52	5100.48	8	2	3.10	1.78	106.61	3.20	23.26	0.02	0.01	0.85	0.03	0.19
PIPELINE INSTALLATION	PIPELINE LAY BARGE diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	SUPPORT VESSEL diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	PIPELINE BURY BARGE diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	SUPPORT VESSEL diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(crew)		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VESSELS>600hp diesel(supply)		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FACILITY INSTALLATION	DERRICK BARGE diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MATERIAL TUG diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(crew)		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(supply)		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PRODUCTION	RECIP.<600hp diesel (crane)		175	8.4525	202.86	2	365	0.39	0.07	5.40	0.43	1.17	0.14	0.03	1.97	0.16	0.43
	RECIP.<600hp diesel (backup generator)		185	8.9355	214.45	24	100	0.41	0.07	5.70	0.46	1.23	0.49	0.09	6.85	0.55	1.48
	RECIP.>600hp diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	SUPPORT VESSEL diesel (crew boat)		2265	109.3995	2625.59	6	156	1.60	0.92	54.88	1.65	11.97	0.75	0.43	25.68	0.77	5.60
	SUPPORT VESSEL diesel (supply boat)		2265	109.3995	2625.59	10	156	1.60	0.92	54.88	1.65	11.97	1.25	0.71	42.81	1.28	9.34
	TURBINE nat gas		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 2 cycle lean nat gas		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 4 cycle lean nat gas		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 4 cycle rich nat gas (comp)		697	4978.671	119488.10	24	365	0.00	0.00	15.35	0.21	13.20	0.01	0.01	67.24	0.94	57.83
	RECIP. 4 cycle rich nat gas (generator 2)		504	3600.072	86401.73	24	185	0.00	0.00	11.10	0.16	9.55	0.00	0.00	24.64	0.35	21.19
	RECIP. 4 cycle rich nat gas (generator 2)		504	3600.072	86401.73	24	185	0.00	0.00	11.10	0.16	9.55	0.00	0.00	24.64	0.35	21.19
	BURNER nat gas		0	0.00	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MISC.		BPD	SCF/HR	COUNT												
	TANK-		1500			24	365				1.88						8.21
	FLARE-			0		0	0		0.00	0.00	0.00	0.00		0.00	0.00		0.00
	PROCESS VENT-Intermittent venting, i.e. upsets, blowdowns, etc.			210000		0.2	100				714.00						7.14
PROCESS VENT-Electrostatic Emulsion Treater Oil Flash			100		24	365				0.34						1.49	
PROCESS VENT-Precipitator Water Flash			425		24	365				1.45						6.33	
PROCESS VENT-Flotation Cell Water Flash			85		24	365				0.29						1.27	
FUGITIVES-				5266.0		365				2.63						11.53	
GLYCOL STILL VENT-			0		0	0				0.00						0.00	
DRILLING	OIL BURN		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
WELL TEST	GAS FLARE		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2019 YEAR TOTAL								22.24	12.45	786.07	744.12	195.59	10.16	5.60	452.99	48.14	173.61
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES											2647.35	2647.35	2647.35	2647.35	62862.31	
	79.5																

AIR EMISSIONS CALCULATIONS

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL
Fieldwood Energy LLC	Eugene Island	315	G02112	A	N/A
Year	Emitted Substance				
	PM	SOx	NOx	VOC	CO
2019	10.16	5.60	452.99	48.14	173.61
2020-2028	2.62	1.28	193.84	40.36	117.07
Allowable	2647.35	2647.35	2647.35	2647.35	62862.31

SECTION I
OIL SPILLS INFORMATION

(a) Oil Spill Response Planning

(a)(2)(i) Regional OSRP Information

All of the proposed activities and facilities in this SDOCD will be covered by the Oil Spill Response Plan filed by Fieldwood Energy LLC (BOEM Operator No. 03295) in accordance with 30 CFR 254. The Fieldwood OSRP was found in compliance on January 25, 2018 and the latest revision was approved on October 30, 2018.

(a)(2)(ii) Spill Response Sites

Primary Response Equipment Location	Preplanned Staging Location(s)
Houma, LA Harvey, LA Leeville, LA	Houma, LA Harvey, LA Leeville, LA Port Fourchon, LA

(a)(2)(iii) OSRO Information

Fieldwood utilizes the Clean Gulf Associates (CGA) and the Marine Spill Response Corporation's (MSRC) STARS network as the primary providers for oil spill removal equipment. The MSRC STARS network provides for the closest available personnel, as well as an MSRC supervisor to operate the equipment. Refer to Appendix F of our OSRP for a listing of potential support services.

(a)(2)(iv) Worst-Case Scenario Determination

Category	Regional OSRP WCD	DOCD WCD	Regional OSRP WCD	DOCD WCD
Type of Activity	Drilling >10 miles	Drilling >10 miles	Production >10 miles from shore	Production >10 miles from shore
Facility Location (Area/Block)	<i>Green Canyon</i> 200	<i>Eugene Island</i> 315	<i>Mississippi Canyon</i> 948	<i>Eugene Island</i> 315
Facility Designation	<i>Well No. TA009</i>	<i>Well No. A019</i>	<i>Well No. 002 ST</i>	<i>Well No. A019</i>
Distance to Nearest Shoreline (miles)	88 miles	79.5 miles	67 miles	79.5 miles
Volume				
Storage tanks (total)	0	7,531	0	0
Uncontrolled blowout	244,312	18,736	40,435	5,706
Pipelines	0	0	0	0
Total Volume	244,312	26,267	40,435	5,706
Type of Oil(s) (crude, condensate, diesel)	Crude	Crude	Crude	Crude
API Gravity	37.5°	31.5°	30°	31.5°

Fieldwood has determined that the worst-case scenario from the activities proposed in this SDOCD do not supersede the worst-case scenario from our approved Regional OSRP, therefore Fieldwood will not replace the worst-case scenario in our Regional OSRP.

I hereby certify that Fieldwood has the capability to respond, to the maximum extent practicable, to a worst-case discharge, or a substantial threat of such a discharge, resulting from the activities proposed in this SDOCD.

(b) Spill Response Discussion for NEPA Analysis

Please see attached Spill Response Discussion prepared for this SDOCD as **Attachment I-1**. In addition to the preparation of the Spill Response Discussion additional information has been provided for NEPA Analysis as described in 30 CFR 254.26(d)(1) under this section.

(c) Modeling Report

A modeling report is not required for the location of the activities proposed in this plan.

Attachments

1) Spill Response Discussion (*Attachment I-1*)

SPILL RESPONSE DISCUSSION

For the purpose of NEPA and Coastal Zone Management Act analysis, the largest spill volume originating from the proposed activity would be a well blowout during drilling operations, estimated to be 26,267 barrels of crude oil with an API gravity of 31.5°.

Land Segment and Resource Identification

Trajectories of a spill and the probability of it impacting a land segment have been projected utilizing information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf of Mexico available on the BOEM website. The results are shown in **Figure 1**. The BOEM OSRAM identifies an 11% probability of impact to the shorelines of Cameron Parish, Louisiana within 30 days. Cameron Parish includes the east side of Sabine Lake, Sabine National Wildlife Refuge, Calcasieu Lake, Lacassine National Wildlife Refuge (inland) and Grand Lake. Cameron Parish also includes the area along the coastline from Sabine Pass to Big Constance Lake in Rockefeller Wildlife Refuge. This region is composed of open public beaches, marshlands and swamps. It serves as a habitat for numerous birds, finfish and other animals, including several rare, threatened and endangered species.

Response

Fieldwood Energy LLC will make every effort to respond to the Worst Case Discharge as effectively as practicable. A description of the response equipment under contract to contain and recover the Worst Case Discharge is shown in **Figure 2**.

Using the estimated chemical and physical characteristics of crude oil, an ADIOS weathering model was run on a similar product from the ADIOS oil database. The results indicate 26% or approximately 6,829 barrels of crude oil would be evaporated/dispersed within 24 hours, with approximately 19,438 barrels remaining.

Natural Weathering Data: EI 315, Well A019	Barrels of Oil
WCD Volume	26,267
Less 26% natural evaporation/dispersion	6,829
Remaining volume	19,438

**EI 315 is surface block; bottom hole in EI 329*

Figure 2 outlines equipment, personnel, materials and support vessels as well as temporary storage equipment available to respond to the worst case discharge. The volume accounts for the amount remaining after evaporation/dispersion at 24 hours. The list estimates individual times needed for procurement, load out, travel time to the site and deployment. **Figure 2** also indicates how operations will be supported.

Fieldwood Energy LLC's Oil Spill Response Plan includes alternative response technologies such as dispersants and in-situ burn. Strategies will be decided by Unified Command based on

an operations safety analysis, the size of the spill, weather and potential impacts. If aerial dispersants are utilized, 8 sorties (9,600 gallons) from two of the DC-3 aircraft and 4 sorties (8,000 gallons) from the Basler aircraft would provide a daily dispersant capability of 7,540 barrels. If the conditions are favorable for in-situ burning, the proper approvals have been obtained and the proper planning is in place, in-situ burning of oil may be attempted. Slick containment boom would be immediately called out and on-scene as soon as possible. Offshore response strategies may include attempting to skim utilizing CGA spill response equipment, with a total derated skimming capacity of 134,808 barrels. Temporary storage associated with skimming equipment equals 5,098 barrels. If additional storage is needed, various storage barges with a total capacity 130,000 bbls may be mobilized and centrally located to provide temporary storage and minimize off-loading time. **Safety is first priority. Air monitoring will be accomplished and operations deemed safe prior to any containment/skimming attempts.**

If the spill went unabated, shoreline impact in Cameron Parish, Louisiana would depend upon existing environmental conditions. Shoreline protection would include the use of CGA's near shore and shallow water skimmers with a totaled derated skimming capacity of 56,374 barrels. Temporary storage associated with skimming equipment equals 1,152 barrels. If additional storage is needed, various storage barges with a total capacity 71,000 bbls may be mobilized and centrally located to provide temporary storage and minimize off-loading time. Onshore response may include the deployment of shoreline boom on beach areas, or protection and sorbent boom on vegetated areas. A Letter of Intent from OMI Environmental will ensure access to 31,400 feet of 18" shoreline protection boom. **Figure 2** outlines individual times needed for procurement, load out, travel time to the site and deployment. Strategies would be based upon surveillance and real time trajectories that depict areas of potential impact given actual sea and weather conditions. Applicable Area Contingency Plans (ACPs), Geographic Response Plans (GRPs), and Unified Command (UC) will be consulted to ensure that environmental and special economic resources are correctly identified and prioritized to ensure optimal protection. Shoreline protection strategies depict the protection response modes applicable for oil spill clean-up operations. As a secondary resource, the State of Louisiana Initial Oil Spill Response Plan will be consulted as appropriate to provide detailed shoreline protection strategies and describe necessary action to keep the oil spill from entering Louisiana's coastal wetlands. The UC should take into consideration all appropriate items detailed in Tactics discussion of this Appendix. The UC and their personnel have the option to modify the deployment and operation of equipment to allow for a more effective response to site-specific circumstances. Fieldwood Energy LLC's contract Spill Management Team has access to the applicable ACP(s) and GRP(s).

Based on the anticipated worst case discharge scenario, Fieldwood Energy LLC can be onsite with contracted oil spill recovery equipment with adequate response capacity to contain and recover surface hydrocarbons, and prevent land impact, to the maximum extent practicable, within an estimated 48 hours (based on the equipment's Effective Daily Recovery Capacity (EDRC)).

Initial Response Considerations

Actual actions taken during an oil spill response will be based on many factors to include but not be limited to:

- Safety
- Weather
- Equipment and materials availability
- Ocean currents and tides
- Location of the spill
- Product spilled
- Amount spilled
- Environmental risk assessments
- Trajectory and product analysis
- Well status, i.e., shut in or continual release

Fieldwood Energy LLC will take action to provide a safe, aggressive response to contain and recover as much of the spilled oil as quickly as it is safe to do so. In an effort to protect the environment, response actions will be designed to provide an “in-depth” protection strategy meant to recover as much oil as possible as far from environmentally sensitive areas as possible. Safety will take precedence over all other considerations during these operations.

Coordination of response assets will be supervised by the designation of a SIMOPS group as necessary for close quarter vessel response activities. Most often, this group will be used during source control events that require a significant number of large vessels operating independently to complete a common objective, in close coordination and support of each other. This group must also monitor the subsurface activities of each vessel (ROV, dispersant application, well control support, etc.). The SIMOPS group leader reports to the Source Control Section Chief.

In addition, these activities will be monitored by the spill management team (SMT) and Unified Command via a structured Common Operating Picture (COP) established to track resource and slick movement in real time.

Upon notification of a spill, the following actions will be taken:

- Information will be confirmed
- An assessment will be made and initial objectives set
- OSROs and appropriate agencies will be notified
- ICS 201, Initial Report Form completed
- Initial Safety plan will be written and published
- Unified Command will be established
 - Overall safety plan developed to reflect the operational situation and coordinated objectives
 - Areas of responsibility established for Source Control and each surface operational site
 - On-site command and control established

Offshore Response Actions

Equipment Deployment

Surveillance

- Surveillance Aircraft: within two hours of QI notification, or at first light
- Provide trained observer to provide on site status reports
- Provide command and control platform at the site if needed
- Continual surveillance of oil movement by remote sensing systems, aerial photography and visual confirmation
- Continual monitoring of vessel assets using vessel monitoring systems

Dispersant application assets

- Put ASI on standby
- With the FOOSC, conduct analysis to determine appropriateness of dispersant application (refer to Section 18)
- Gain FOOSC approval for use of dispersants on the surface
- Deploy aircraft in accordance with a plan developed for the actual situation
- Coordinate movement of dispersants, aircraft, and support equipment and personnel
- Confirm dispersant availability for current and long range operations
- Start ordering dispersant stocks required for expected operations

Containment boom

- Call out early and expedite deployment to be on scene ASAP
- Ensure boom handling and mooring equipment is deployed with boom
- Provide continuing reports to vessels to expedite their arrival at sites that will provide for their most effective containment
- Use Vessels of Opportunity (VOO) to deploy and maintain boom

Oceangoing Boom Barge

- Containment at the source
- Increased/enhanced skimmer encounter rate
- Protection booming

In-situ Burn assets

- Determine appropriateness of in-situ burn operation in coordination with the FOOSC and affected SOOSC
- Determine availability of fire boom and selected ignition systems
- Start ordering fire boom stocks required for expected operations
- Contact boom manufacturer to provide training & tech support for operations, if required
- Determine assets to perform on water operation
- Build operations into safety plan
- Conduct operations in accordance with an approved plan
- Initial test burn to ensure effectiveness

Dedicated off-shore skimming systems

General

- Deployed to the highest concentration of oil
- Assets deployed at safe distance from aerial dispersant and in-situ burn operations

CGA HOSS Barge

- Use in areas with heaviest oil concentrations
- Consider for use in areas of known debris (seaweed, and other floating materials)

CGA 95' Fast Response Vessels (FRVs)

- Designed to be a first vessel on scene
- Capable of maintaining the initial Command and Control function for on water recovery operations
- 24 hour oil spill detection capability
- Highly mobile and efficient skimming capability
- Use as far off-shore as safely possible

CGA FRUs

- To the area of the thickest oil
- Use as far off-shore as allowed
- VOOs 140' – 180' in length
- VOOs with minimum of 18' x 38' or 23' x 50' of optimum deck space
- VOOs in shallow water should have a draft of <10 feet when fully loaded

T&T Koseq Skimming Systems

- To the area of the thickest oil
- Use as far off-shore as allowed
- VOOs with a minimum of 2,000 bbls storage capacity
- VOOs at least 200' in length
- VOOs with deck space of 100' x 40' to provide space for arms, tanks, and crane
- VOOs for shallow water should be deck barges with a draft of <10 feet when fully loaded

Storage Vessels

- Establish availability of CGA contracted assets (See Appendix E)
- Early call out (to allow for tug boat acquisition and deployment speeds)
- Phase mobilization to allow storage vessels to arrive at the same time as skimming systems
- Position as closely as possible to skimming assets to minimize offloading time

Vessels of Opportunity (VOO)

- Use Fieldwood Energy LLC's contracted resources as applicable
- Industry vessels are ideal for deployment of Vessel of Opportunity Skimming Systems (VOSS)
- Acquire additional resources as needed
- Consider use of local assets, i.e. fishing and pleasure craft for ISB operations or boom tending
- Expect mission specific and safety training to be required
- Plan with the US Coast Guard for vessel inspections
- Place VOOs in Division or Groups as needed
- Use organic on-board storage if appropriate
- Maximize non-organic storage appropriate to vessel limitations
- Decant as appropriate after approval to do so has been granted
- Assign bulk storage barges to each Division/Group
- Position bulk storage barges as close to skimming units as possible
- Utilize large skimming vessel (e.g. barges) storage for smaller vessel offloading
- Maximize skimming area (swath) to the optimum width given sea conditions and available equipment
- Maximize use of oleophilic skimmers in all operations, but especially offshore
- Nearshore, use shallow water barges and shuttle to skimming units to minimize offloading time
- Plan and equip to use all offloading capabilities of the storage vessel to minimize offloading time

Adverse Weather Operations:

In adverse weather, when seas are ≥ 3 feet, the use of larger recovery and storage vessels, oleophilic skimmers, and large offshore boom will be maximized. KOSEQ Arm systems are built for rough conditions, and they should be used until their operational limit (9.8' seas) is met. Safety will be the overriding factor in all operations and will cease at the order of the Unified Command, vessel captain, or in an emergency, "stop work" may be directed by any crew member.

Surface Oil Recovery Considerations and Tactics (Offshore and Near-shore Operations)

Maximization of skimmer-oil encounter rate

- Place barges in skimming task forces, groups, etc., to reduce recovered oil offloading time
- Place barges alongside skimming systems for immediate offloading of recovered oil when practicable
- Use two vessels, each with heavy sea boom, in an open-ended "V" configuration to funnel surface oil into a trailing skimming unit's organic, V-shaped boom and skimmer (see page 7, *CGA Equipment Guide Book and Tactic Manual (CGATM)*)

- Use secondary vessels and heavy sea boom to widen boom swath beyond normal skimming system limits (see page 15, CGATM)
- Consider night-time operations, first considering safety issues
- Utilize all available advanced technology systems (IR, X-Band Radar, etc.) to determine the location of, and move to, recoverable oil
- Confirm the presence of recoverable oil prior to moving to a new location

Maximize skimmer system efficiency

- Place weir skimming systems in areas of calm seas and thick oil
- Maximize the use of oleophilic skimming systems in heavier seas
- Place less mobile, high EDRC skimming systems (e.g. HOSS Barge) in the largest pockets of the heaviest oil
- Maximize onboard recovered oil storage for vessels.
- Obtain authorization for decanting of recovered water as soon as possible
- Use smaller, more agile skimming systems to recover streamers of oil normally found farther from the source. Place recovered oil barges nearby

Recovered Oil Storage

- Smaller barges in larger quantities will increase flexibility for multi-location skimming operations
- Place barges in skimming task forces, groups, etc., to reduce recovered oil offloading time
- Procure and deploy the maximum number of portable tanks to support Vessel of Opportunity Skimming Systems if onboard storage is not available
- Maximize use of the organic recovered oil storage capacity of the skimming vessel

Command, Control, and Communications (C³)

- Publish, implement, and fully test an appropriate communications plan
- Design an operational scheme, maintaining a manageable span of control
- Designate and mark C³ vessels for easy aerial identification
- Designate and employ C³ aircraft for task forces, groups, etc.
- Use reconnaissance air craft and Rapid Response Teams (RAT) to confirm the presence of recoverable oil

On Water Recovery Group

When the first skimming vessel arrives on scene, a complete site assessment will be conducted before recovery operations begin. Once it is confirmed that the air monitoring readings for O₂, LEL, H₂S, CO, VOC, and Benzene are all within the permissible limits, oil recovery operations may begin.

As skimming vessels arrive, they will be organized to work in areas that allow for the most efficient vessel operation and free vessel movement in the recovery of oil. Vessel groups will vary in structure as determined by the Operations Section of the Unified Command, but will generally consist, at a minimum, of the following dedicated assets:

- 3 to 5 – Offshore skimming vessels (recovery)
- 1 – Tank barge (temporary storage)
- 1 – Air asset (tactical direction)
- 2 – Support vessels (crew/utility for supply)
- 6 to 10 – Boom vessels (enhanced booming)

Example (Note: Actual organization of TFs will be dependent on several factors including, asset availability, weather, spilled oil migration, currents, etc.)

The 95' FRV Breton Island out of Venice arrives on scene and conducts an initial site assessment. Air monitoring levels are acceptable and no other visual threats have been observed. The area is cleared for safe skimming operations. The Breton Island assumes command and control (CoC) of on-water recovery operations until a dedicated non-skimming vessel arrives to relieve it of those duties.

A second 95' FRV arrives and begins recovery operations alongside the Breton Island. Several more vessels begin to arrive, including a third 95' FRV out of Galveston, the HOSS Barge (High Volume Open Sea Skimming System) out of Harvey, a boom barge (CGA 300) with 25,000' of 42" auto boom out of Leeville, and 9 Fast Response Units (FRUs) from the load-out location at C-Port in Port Fourchon.

As these vessels set up and begin skimming, they are grouped into task forces (TFs) as directed by the Operations Section of the Unified Command located at the command post.

Initial set-up and potential actions:

- A 1,000 meter safety zone has been established around the incident location for vessels involved in Source Control
- The HOSS Barge is positioned facing the incident location just outside of this safety zone or at the point where the freshest oil is reaching the surface
- The HOSS Barge engages its Oil Spill Detection (OSD) system to locate the heaviest oil and maintains that ability for 24-hour operations

- The HOSS Barge deploys 1,320' of 67" Sea Sentry boom on each side, creating a swath width of 800'
- The Breton Island and H.I. Rich skim nearby, utilizing the same OSD systems as the HOSS Barge to locate and recover oil
- Two FRUs join this group and it becomes TF1
- The remaining 7 FRUs are split into a 2 and 3 vessel task force numbered TF2 and TF3
- A 95' FRV is placed in each TF
- The boom barge (CGA 300) is positioned nearby and begins deploying auto boom in sections between two utility vessels (1,000' to 3,000' of boom, depending on conditions) with chain-link gates in the middle to funnel oil to the skimmers
- The initial boom support vessels position in front of TF2 and TF3
- A 100,000+ barrel offshore tank barge is placed with each task force as necessary to facilitate the immediate offload of skimming vessels

The initial task forces (36 hours in) may be structured as follows:

TF 1

- 1 – 95' FRV
- 1 – HOSS Barge with 3 tugs
- 2 – FRUs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 8 – 500' sections of auto boom with gates
- 8 – Boom-towing vessels
- 2 – Support vessels (crew/utility)

TF 2

- 1 – 95' FRV
- 4 – FRUs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 10 – 500' sections of auto boom with gates
- 10 – Boom-towing vessels
- 2 – Support vessels (crew/utility)

TF 3

- 1 – 95' FRV
- 3 – FRUs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 8 – 500' sections of auto boom with gates
- 8 – Boom-towing vessels
- 2 – Support vessels (crew/utility)

Offshore skimming equipment continues to arrive in accordance with the ETA data listed in figure H.3a; this equipment includes 2 AquaGuard skimmers and 11 sets of Koseq Rigid Skimming Arms. These high volume heavy weather capable systems will be divided into functional groups and assigned to specific areas by the Operations Section of the Unified Command.

At this point of the response, the additional TFs may assume the following configurations:

TF 4

- 2 – Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 – AquaGuard Skimmer
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 2 – Support vessels (crew/utility)
- 6 – 500' sections of auto boom with gates
- 6 – Boom-towing vessels

TF 5

- 3 – Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 – AquaGuard Skimmer
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 2 – Support vessels (crew/utility)
- 8 – 500' sections of auto boom with gates
- 8 – Boom-towing vessels

TF 6

- 3 – Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 2 – Support vessels (crew/utility)
- 6 – 500' sections of auto boom with gates
- 6 – Boom-towing vessels

TF 7

- 3 – Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 2 – Support vessels (crew/utility)
- 6 – 500' sections of auto boom with gates
- 6 – Boom-towing vessels

CGA Minimum Acceptable Capabilities for Vessels of Opportunity (VOO)

Minimum acceptable capabilities of Petroleum Industry Designed Vessels (PIDV) for conducting Vessel of Opportunity (VOO) skimming operations are shown in the table below. PIDVs are “purpose-built” to provide normal support to offshore oil and gas operators. They include but are not limited to utility boats, offshore supply vessels, etc. They become VOOs when tasked with oil spill response duties.

Capability	FRU	KOSEQ	AquaGuard
Type of Vessel	Utility Boat	Offshore Supply Vessel	Utility Boat
Operating parameters			
Sea State	3-5 ft max	9.8 ft max	3-5 ft max
Skimming speed	≤1 kt	≤3 kts	≤1 kt
Vessel size			
Minimum Length	100 ft	200 ft	100 ft
Deck space for: <ul style="list-style-type: none"> • Tank(s) • Crane(s) • Boom Reels • Hydraulic Power Units • Equipment Boxes 	18x32 ft	100x40 ft	18x32 ft
Communication Assets	Marine Band Radio	Marine Band Radio	Marine Band Radio

Tactical use of Vessels of Opportunity (VOO): Fieldwood Energy LLC will take all possible measures to maximize the oil-to-skimmer encounter rate of all skimming systems, to include VOOs, as discussed in this section. VOOs will normally be placed within an On-water recovery unit as shown in figures below.

Skimming Operations: PIDVs are the preferred VOO skimming platform. OSROs are more versed in operating on these platforms and the vessels are generally large enough with crews more likely versed in spill response operations. They also have a greater possibility of having on-board storage capacity and the most likely vessels to be under contract, and therefore more readily available to the operator. These vessels would normally be assigned to an on-water recovery group/division (see figure below) and outfitted with a VOSS suited for their size and capabilities. Specific tactics used for skimming operations would be dependent upon many parameters which include, but are not limited to, safety concerns, weather, type VOSS on board, product being recovered, and area of oil coverage. Planners would deploy these assets with the objective of safely maximizing oil- to-skimmer encounter rate by taking actions to minimize non-skimming time and maximizing boom swath. Specific tactical configurations are shown in figures below.

The Fast Response Unit (FRU): A self-contained, skid based, skimming system that is deployed from the right side of a vessel of opportunity (VOO). An outrigger holds a 75' long section of air inflatable boom in place that directs oil to an apex for recovery via a Foilex 250 weir skimmer. The outrigger creates roughly a 40' swath width dependent on the VOO beam. The lip of the collection bowl on the skimmer is placed as close to the oil and water interface as possible to maximize oil recovery and minimize water retention. The skimmer then pumps all fluids recovered to the storage tank where it is allowed to settle, and with the approval of the Coast Guard, the water is decanted from the bottom of the tank back into the water ahead of the containment boom to be recycled through the system. Once the tank is full of as much pure recovered oil as possible it is offloaded to a storage barge for disposal in accordance with an approved disposal plan. A second 100 barrel storage tank can be added if the appropriate amount of deck space is available to use as secondary storage.

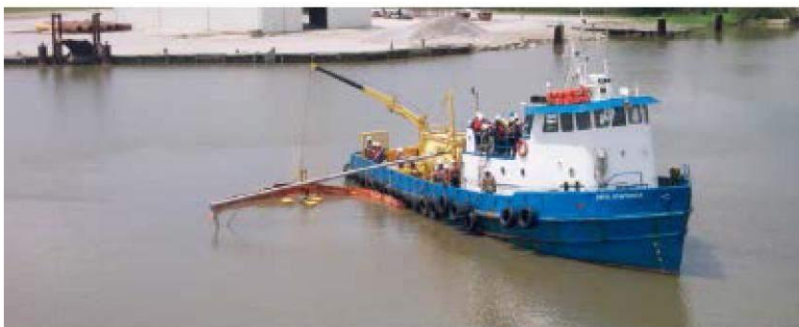
Tactical Overview

Mechanical Recovery – The FRU is designed to provide fast response skimming capability in the offshore and nearshore environment in a stationary or advancing mode. It provides a rated daily recovery capacity of 4,100 barrels. An additional boom reel with 440' of offshore boom can be deployed along with the FRU, and a second support vessel for boom towing, to extend the swath width when attached to the end of the fixed boom. The range and sustainability offshore is dependent on the VOO that the unit is placed on, but generally these can stay offshore for extended periods. The FRU works well independently or assigned with other on-water recovery assets in a task force. In either case, it is most effective when a designated aircraft is assigned to provide tactical direction to ensure the best placement in recoverable oil.

Maximum Sea Conditions – Under most circumstances the FRU can maintain standard oil spill recovery operations in 2' to 4' seas. Ultimately, the Coast Guard licensed Captain in charge of the VOO (with input from the CGAS Supervisor assigned) will be responsible to determine when the sea conditions have surpassed the vessel's safe operating capabilities.

Possible Task Force Configuration (Multiple VOOs can be deployed in a task force)

- 1 – VOO (100' to 165' Utility or Supply Vessel)
- 1 – Boom reel w/support vessel for towing
- 1 – Tank barge (offshore) for temporary storage
- 1 – Utility/Crewboat (supply)
- 1 – Designated spotter aircraft



The VOSS (yellow) is being deployed and connected to an out-rigged arm. This is suitable for collection in both large pockets of oil and for recovery of streaming oil. The oil-to-skimmer encounter rate is limited by the length of the arm. Skimming pace is ≤ 1 knot.



Through the use of an additional VOO, and using extended sea boom, the swath of the VOSS is increased therefore maximizing the oil-to-skimmer encounter rate. Skimming pace is ≤ 1 knot.

The Koseq Rigid Sweeping Arm: A skimming system deployed on a vessel of opportunity. It requires a large Offshore or Platform Supply Vessel (OSV/PSV), greater than 200' with at least 100' x 50' of free deck space. On each side of the vessel, a 50' long rigid framed Arm is deployed that consists of pontoon chambers to provide buoyancy, a smooth nylon face, and a hydraulically adjustable mounted weir skimmer. The Arm floats independently of the vessel and is attached by a tow bridle and a lead line. The movement of the vessel forward draws the rubber end seal of the arm against the hull to create a collection point for free oil directed to the weir by the Arm face. The collection weir is adjusted to keep the lip as close to the oil water interface as possible to maximize oil recovery while attempting to minimize excess water collection. A transfer pump (combination of positive displacement, screw type and centrifuge suited for highly viscous oils) pump the recovered liquid to portable tanks and/or dedicated fixed storage tanks onboard the vessel. After being allowed to sit and separate, with approval from the Coast Guard, the water can be decanted (pumped off) in front of the collection arm to be reprocessed through the system. Once full with as much pure recovered oil as possible, the oil is transferred to a temporary storage barge where it can be disposed of in accordance with an approved disposal plan.

Tactical Overview

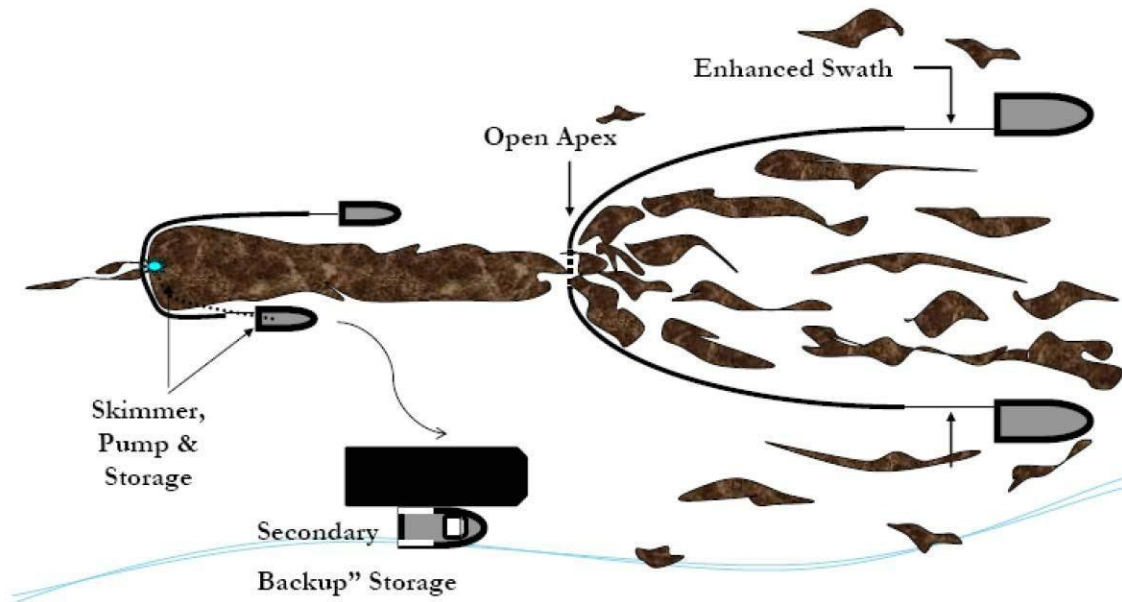
Mechanical Recovery – Deployed on large vessels of opportunity (VOO) the Koseq Rigid Sweeping Arms are high volume surge capacity deployed to increase recovery capacity at the source of a large oil spill in the offshore and outer nearshore environment of the Gulf of Mexico. They are highly mobile and sustainable in rougher sea conditions than normal skimming vessels (9.8' seas). The large Offshore Supply Vessels (OSV) required to deploy the Arms are able to remain on scene for extended periods, even when sea conditions pick up. Temporary storage on deck in portable tanks usually provides between 1,000 and 3,000 bbls. In most cases, the OSV will be able to pump 20% of its deadweight into the liquid mud tanks in accordance with the vessels Certificate of Inspection (COI). All storage can be offloaded utilizing the vessels liquid transfer system.

Maximum Sea Conditions - Under most circumstances the larger OSVs are capable of remaining on scene well past the Skimming Arms maximum sea state of 9.8'. Ultimately it will be the decision of the VOO Captain, with input from the T&T Supervisor onboard, to determine when the sea conditions have exceeded the safe operating conditions of the vessel.

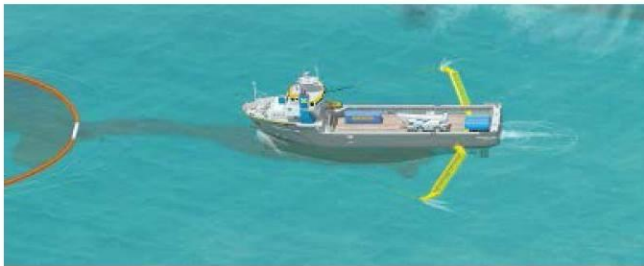
Command and Control – The large OSVs in many cases have state of the art communication and electronic systems, as well as the accommodations to support the function of directing all skimming operations offshore and reporting back to the command post.

Possible Task Force Configuration (Multiple Koseq VOOs can be deployed in a task force)

- 1 – \geq 200' Offshore Supply Vessels (OSV) with set of Koseq Arms
- 2 to 4 portable storage tanks (500 bbl)
- 1 – Modular Crane Pedestal System set (MCPS) or 30 cherry picker (crane) for deployment
- 1 – Tank barge (offshore) for temporary storage
- 1 – Utility/Crewboat (supply)
- 1 – Designated spotter aircraft
- 4 – Personnel (4 T&T OSRO)



Scattered oil is “caught” by two VOO and collected at the apex of the towed sea boom. The oil moves through a “gate” at that apex, forming a larger stream of oil which moves into the boom of the skimming vessel. Operations are paced at >1 . A recovered oil barge stationed nearby to minimize time taken to offload recovered oil.



This is a depiction of the same operation as above but using KOSEQ Arms. In this configuration, the collecting boom speed dictates the operational pace at ≥ 1 knot to minimize entrainment of the oil.

Clean Gulf Associates (CGA) Procedure for Accessing Member-Contracted and other Vessels of Opportunity (VOOs) for Spill Response

- CGA has procedures in place for CGA member companies to acquire vessels of opportunity (VOOs) from an existing CGA member's contracted fleet or other sources for the deployment of CGA portable skimming equipment including Koseq Arms, Fast Response Units (FRUs) and any other portable skimming system(s) deemed appropriate for the response for a potential or actual oil spill, WCD oil spill or a Spill of National Significance (SONS).
- CGA uses Port Vision, a web-based vessel and terminal interface that empowers CGA to track vessels through Automatic Identification System (AIS) and terminal activities using a Geographic Information System (GIS). It provides live AIS/GIS views of waterways showing current vessel positions, terminals, created vessel fleets, and points-of-interest. Through this system, CGA has the ability to get instant snapshots of the location and status of all vessels contracted to CGA members, day or night, from any web-enabled PC.

Near Shore Response Actions

Timing

- Put near shore assets on standby and deployment in accordance with planning based on the actual situation, actual trajectories and oil budgets
- VOO identification and training in advance of spill nearing shoreline if possible
- Outfitting of VOOs for specific missions
- Deployment of assets based on actual movement of oil

Considerations

- Water depth, vessel draft
- Shoreline gradient
- State of the oil
- Use of VOOs
- Distance of surf zone from shoreline

Surveillance

- Provide trained observer to direct skimming operations
- Continual surveillance of oil movement by remote sensing systems, aerial photography and visual confirmation
- Continual monitoring of vessel assets

Dispersant Use

- Generally will not be approved within 3 miles of shore or with less than 10 meters of water depth
- Approval would be at Regional Response Team level (Region 6)

Dedicated Near Shore skimming systems

- FRVs
- Egmpol and Marco SWS
- Operate with aerial spotter directing systems to observed oil slicks

VOO

- Use Fieldwood Energy LLC's contracted resources as applicable
- Industry vessel are usually best for deployment of Vessel of Opportunity Skimming Systems (VOSS)
- Acquire additional resources as needed
- Consider use of local assets, i.e. fishing and pleasure craft
- Expect mission specific and safety training to be required
- Plan with the US Coast Guard for vessel inspections
- Operate with aerial spotter directing systems to oil patches

Shoreline Protection Operations

Response Planning Considerations

- Review appropriate Area Contingency Plan(s)
- Locate and review appropriate Geographic Response and Site Specific Plans
- Refer to appropriate Environmentally Sensitive Area Maps
- Capability for continual analysis of trajectories run periodically during the response
- Environmental risk assessments (ERA) to determine priorities for area protection
- Time to acquire personnel and equipment and their availability
- Refer to the State of Louisiana Initial Oil Spill Response Plan, Deep Water Horizon, dated 2 May 2010, as a secondary reference
- Aerial surveillance of oil movement
- Pre-impact beach cleaning and debris removal
- Shoreline Cleanup Assessment Team (SCAT) operations and reporting procedures
- Boom type, size and length requirements and availability
- Possibility of need for In-situ burning in near shore areas
- Current wildlife situation, especially status of migratory birds and endangered species in the area
- Check for Archeological sites and arrange assistance for the appropriate state agency when planning operations that may impact these areas

Placement of boom

- Position boom in accordance with the information gained from references listed above and based on the actual situation
- Determine areas of natural collection and develop booming strategies to move oil into those areas
- Assess timing of boom placement based on the most current trajectory analysis and the availability of each type of boom needed. Determine an overall booming priority and conduct booming operations accordingly. Consider:
 - Trajectories
 - Weather forecast
 - Oil Impact forecast
 - Verified spill movement
 - Boom, manpower and vessel (shallow draft) availability
 - Near shore boom and support material, (stakes, anchors, line)

Beach Preparation - Considerations and Actions

- Use of a 10 mile go/no go line to determine timing of beach cleaning
- SCAT reports and recommendations
- Determination of archeological sites and gaining authority to enter
- Monitoring of tide tables and weather to determine extent of high tides
- Pre cleaning of beaches by moving waste above high tide lines to minimize waste
- Determination of logistical requirements and arranging of waste removal and disposal

- Staging of equipment and housing of response personnel as close to the job site as possible to maximize on-site work time
- Boom tending, repair, replacement and security (use of local assets may be advantageous)
- Constant awareness of weather and oil movement for resource re-deployment as necessary
- Earthen berms and shoreline protection boom may be considered to protect sensitive inland areas
- Requisitioning of earth moving equipment
- Plan for efficient and safe use of personnel, ensuring:
 - A continual supply of the proper Personal Protective Equipment
 - Heating or cooling areas when needed
 - Medical coverage
 - Command and control systems (i.e. communications)
 - Personnel accountability measures
- Remediation requirements, i.e., replacement of sands, rip rap, etc.
- Availability of surface washing agents and associated protocol requirements for their use (see National Contingency Plan Product Schedule for list of possible agents)
- Discussions with all stakeholders, i.e., land owners, refuge/park managers, and others as appropriate, covering the following:
 - Access to areas
 - Possible response measures and impact of property and ongoing operations
 - Determination of any specific safety concerns
 - Any special requirements or prohibitions
 - Area security requirements
 - Handling of waste
 - Remediation expectations
 - Vehicle traffic control
 - Domestic animal safety concerns
 - Wildlife or exotic game concerns/issues

*Inland and Coastal Marsh Protection and Response
Considerations and Actions*

- All considered response methods will be weighed against the possible damage they may do to the marsh. Methods will be approved by the Unified Command only after discussions with local Stakeholder, as identified above.
 - In-situ burn may be considered when marshes have been impacted
- Passive clean up of marshes should be considered and appropriate stocks of sorbent boom and/or sweep obtained.
- Response personnel must be briefed on methods to traverse the marsh, i.e.,
 - use of appropriate vessel
 - use of temporary walkways or road ways
- Discuss and gain approval prior cutting or moving vessels through vegetation
- Discuss use of vessels that may disturb wildlife, i.e., airboats
- Safe movement of vessels through narrow cuts and blind curves

- Consider the possibility that no response in a marsh may be best
- In the deployment of any response asset, actions will be taken to ensure the safest, most efficient operations possible. This includes, but is not limited to:
 - Placement of recovered oil or waste storage as near to vessels or beach cleanup crews as possible.
 - Planning for stockage of high use items for expeditious replacement
 - Housing of personnel as close to the work site as possible to minimize travel time
 - Use of shallow water craft
 - Use of communication systems appropriate ensure command and control of assets
 - Use of appropriate boom in areas that I can offer effective protection
 - Planning of waste collection and removal to maximize cleanup efficiency
- Consideration or on-site remediation of contaminated soils to minimize replacement operations and impact on the area

Decanting Strategy

Recovered oil and water mixtures will typically separate into distinct phases when left in a quiescent state. When separation occurs, the relatively clean water phase can be siphoned or decanted back to the recovery point with minimal, if any, impact. Decanting therefore increases the effective on-site oil storage capacity and equipment operating time. FOSC/SOSC approval will be requested prior to decanting operations. This practice is routinely used for oil spill recovery.

CGA Equipment Limitations

The capability for any spill response equipment, whether a dedicated or portable system, to operate in differing weather conditions will be directly in relation to the capabilities of the vessel the system is placed on. Most importantly, however, the decision to operate will be based on the judgment of the Unified Command and/or the Captain of the vessel, who will ultimately have the final say in terminating operations. Skimming equipment listed below may have operational limits which exceed those safety thresholds. As was seen in the Deepwater Horizon (DWH) oil spill response, vessel skimming operations ceased when seas reached 5-6 feet and vessels were often recalled to port when those conditions were exceeded. Systems below are some of the most up-to-date systems available and were employed during the DWH spill.

Boom	3 foot seas, 20 knot winds
Dispersants	Winds more than 25 knots Visibility less than 3 nautical miles Ceiling less than 1,000 feet.
FRU	8 foot seas
HOSS Barge/OSRB	8 foot seas
Koseq Arms	8 foot seas
OSRV	4 foot seas

Environmental Conditions in the GOM

Louisiana is situated between the easterly and westerly wind belts, and therefore, experiences westerly winds during the winter and easterly winds in the summer. Average wind speed is generally 14-15 mph along the coast. Wave heights average 4 and 5 feet. However, during hurricane season, Louisiana has recorded wave heights ranging from 40 to 50 feet high and winds reaching speeds of 100 mph. Because much of southern Louisiana lies below sea level, flooding is prominent.

Surface water temperature ranges between 70 and 80 ° F during the summer months. During the winter, the average temperature will range from 50 and 60 ° F.

The Atlantic and Gulf of Mexico hurricane season is officially from 1 June to 30 November. 97% of all tropical activity occurs within this window. The Atlantic basin shows a very peaked season from August through October, with 78% of the tropical storm days, 87% of the minor (Saffir-Simpson Scale categories 1 and 2) hurricane days, and 96% of the major (Saffir-Simpson categories 3, 4 and 5) hurricane days occurring then. Maximum activity is in early to mid September. Once in a few years there may be a hurricane occurring "out of season" - primarily in May or December. Globally, September is the most active month and May is the least active month.

**FIGURE 1
TRAJECTORY BY LAND SEGMENT**

<p>Trajectory of a spill and the probability of it impacting a land segment have been projected utilizing Fieldwood Energy LLC's WCD and information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf of Mexico available on the BOEM website using 30 day impact. The results are tabulated below.</p>				
Area/Block	OCS-G	Launch Area	Land Segment and/or Resource	Conditional Probability (%)
<p>EI 315, Well A019* <i>79.5 miles from shore</i></p>	G02112	C40	Calhoun, TX	1
			Matagorda, TX	3
			Brazoria, TX	1
			Galveston, TX	5
			Jefferson, TX	5
			Cameron, LA	11
			Vermilion, LA	4
			Iberia, LA	2
			St. Mary, LA	1
			Terrebonne, LA	4
			Lafourche, LA	1
			Plaquemines, LA	2

**EI 315 is surface block; bottom hole in EI 329*

WCD Scenario– BASED ON WELL BLOWOUT DURING DRILLING OPERATIONS (79.5 miles from shore)
 19,438 bbls of crude oil (Volume considering natural weathering)
 API Gravity 31.5°

FIGURE 2 – Equipment Response Time to EI 315, Well A019*
**EI 315 is surface block; bottom hole in EI 329*

Dispersants/Surveillance

Dispersant/Surveillance	Dispersant Capacity (gal)	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to site	Total Hrs
ASI							
Basler 67T	2000	2	Houma	2	2	0.6	4.6
DC 3	1200	2	Houma	2	2	0.8	4.8
DC 3	1200	2	Houma	2	2	0.8	4.8
Aero Commander	NA	2	Houma	2	2	0.6	4.6

Offshore Response

Offshore Equipment Pre-Determined Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
CGA											
HOSS Barge	76285	4000	3 Tugs	12	Harvey	6	0	12	10	2	30
95' FRV	22885	249	NA	6	Leeville	2	0	2	5.5	1	10.5
95' FRV	22885	249	NA	6	Vermilion	2	0	3	3.5	1	9.5
Boom Barge (CGA-300) 42" Auto Boom (25000')	NA	NA	1 Tug 50 Crew	4 (Barge) 2 (Per Crew)	Leeville	8	0	4	16	2	30
Enterprise Marine Services LLC (Available through contract with CGA)											
CTCo 2604	NA	20000	1 Tug	6	Amelia	32	0	6	9	1	48
CTCo 2605	NA	20000	1 Tug	6	Amelia	32	0	6	9	1	48
CTCo 2606	NA	20000	1 Tug	6	Amelia	32	0	6	9	1	48
CTCo 2607	NA	23000	1 Tug	6	Amelia	32	0	6	9	1	48
CTCo 5001	NA	47000	1 Tug	6	Amelia	32	0	6	9	1	48

Staging Area: Fourchon

Offshore Equipment With Staging	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Site	Hrs to Deploy	Total Hrs
CGA											
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Morgan City	2	6	3	9	1	21
FRU (2) + 100 bbl Tank (4)	8502	400	2 Utility	12	Leeville	2	6	2	9	1	20
Hydro-Fire Boom	NA	NA	8 Utility	40	Harvey	0	24	3	9	6	42

Nearshore Response

Nearshore Equipment Pre-determined Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
CGA											
Trinity SWS	21500	249	NA	4	Lake Charles	2	0	N/A	48	1	51
46' FRV	15257	65	NA	4	Lake Charles	2	0	2	2.5	1	7.5
Enterprise Marine Services LLC (Available through contract with CGA)											
CTCo 2603	NA	25000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 2608	NA	23000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 2609	NA	23000	1 Tug	6	Amelia	26	0	6	15	1	48

Staging Area: Cameron

Nearshore Equipment With Staging	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Load Out	Travel to Staging	Travel to Deployment	Hrs to Deploy	Total Hrs
CGA											
SWS Egmopol	1810	100	NA	3	Galveston	2	2	5	2	1	12
SWS Egmopol	1810	100	NA	3	Morgan City	2	2	4.5	2	1	11.5
SWS Marco	3588	20	NA	3	Lake Charles	2	2	2	2	1	9
SWS Marco	3588	34	NA	3	Leeville	2	2	7	2	1	14
SWS Marco	3588	34	NA	3	Venice	2	2	9.5	2	1	16.5
Foilex Skim Package (TDS 150)	1131	50	NA	3	Lake Charles	4	12	2	2	2	22
Foilex Skim Package (TDS 150)	1131	50	NA	3	Galveston	4	12	5	2	2	25
Foilex Skim Package (TDS 150)	1131	50	NA	3	Harvey	4	12	7	2	2	27
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Lake Charles	2	2	2	2	1	9
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Harvey	2	2	7	2	1	14
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Lake Charles	2	2	2	2	1	9
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Harvey	2	2	7	2	1	14

Shoreline Protection

Staging Area: Cameron

Shoreline Protection Boom	VOO	Persons Req.	Storage/Warehouse Location	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Deployment Site	Hrs to Deploy	Total Hrs
OMI Environmental (available through Letter of Intent)									
12,500' 18" Boom	6 Crew	12	New Iberia, LA	1	1	4	2	3	11
6,400' 18" Boom	3 Crew	6	Houston, TX	1	1	4	2	3	11
3,500' 18" Boom	2 Crew	4	Port Arthur, TX	1	1	2	2	3	9
8,000' 18" Boom	3 Crew	6	Port Allen, LA	1	1	5	2	3	12
1,000' 18" Boom	1 Crew	2	Hackberry, LA	1	1	1	2	3	8

Wildlife Response	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Deployment	Hrs to Deploy	Total Hrs
CGA											
Wildlife Support Trailer	NA	NA	NA	2	Harvey	2	2	7	1	2	14
Bird Scare Guns (24)	NA	NA	NA	2	Harvey	2	2	7	1	2	14
Bird Scare Guns (12)	NA	NA	NA	2	Galveston	2	2	5	1	2	12
Bird Scare Guns (12)	NA	NA	NA	2	Aransas Pass	2	2	9.5	1	2	16.5
Bird Scare Guns (48)	NA	NA	NA	2	Lake Charles	2	2	2	1	2	9
Bird Scare Guns (24)	NA	NA	NA	2	Leeville	2	2	7	1	2	14

Response Asset	Total
Offshore EDRC	134,808
Offshore Recovered Oil Capacity	135,098
Nearshore / Shallow Water EDRC	56,374
Nearshore / Shallow Water Recovered Oil Capacity	72,152

SECTION J
ENVIRONMENTAL MONITORING INFORMATION

(a) Monitoring Systems

There are no environmental monitoring systems currently in place or planned for the proposed activities.

(b) Incidental Takes

No incidental takes are anticipated. Fieldwood implements the mitigation measures and monitors for incidental takes of protected species according to the following notices to lessees and operators from both BOEM and BSEE:

- **NTL 2015-G03** “Marine Trash and Debris Awareness and Elimination”
- **NTL 2016-G01** “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting”
- **NTL 2016-G02** “Implementation of Seismic Survey Mitigation Measure & Protected Species Observer Program”

SECTION K
LEASE STIPULATIONS INFORMATION

Eugene Island Blocks 315 and 329, Leases OCS-G02112 and OCS-G02912 respectively, did not invoke any lease stipulations, however will comply with the following:

Marine Protected Species

Fieldwood will operate in accordance with NTL 2016-G01 “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting” and NTL 2016-G02 “Implementation of Seismic Survey Mitigation Measure & Protected Species Observer Program”, to minimize the risk of vessel strikes to protected species and report observations of injured or dead protected species, and the prevention of intentional and/or accidental introduction of debris into the marine environment.

SECTION L
ENVIRONMENTAL MITIGATION MEASURES INFORMATION

(a) Measures Taken to Avoid, Minimize, and Mitigate Impacts

The proposed action will implement mitigation measures required by laws and regulations, including all applicable Federal & State requirements concerning air emissions, discharges to water, and solid waste disposal, as well as any additional permit requirements and Fieldwood's policies. Project activities will be conducted in accordance with the Regional OSRP.

(b) Incidental Takes

Fieldwood does not anticipate any incidental takes related to the proposed operations. Fieldwood implements the mitigation measures and monitors for incidental takes of protected species according to the following notices to lessees and operators from both BOEM and BSEE:

- **NTL 2015-G03** "Marine Trash and Debris Awareness and Elimination"
- **NTL 2016-G01** "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting"
- **NTL 2016-G02** "Implementation of Seismic Survey Mitigation Measure & Protected Species Observer Program"

SECTION M
RELATED FACILITIES AND OPERATIONS INFORMATION

(a) Related OCS Facilities and Operations

Fieldwood plans to further develop the Eugene Island 315 A facility (Complex ID No. 22637) by drilling the new Well No. A019 (ST00 BP00). The bottom-hole location of the well will be in Eugene Island Block 329.

Platform A is an 8-pile, 2-deck fixed and manned facility located in Eugene Island Block 315, approximately 79 miles from shore in 240' of water. The facility was installed January 1, 1982 and is equipped with 21 slots for incoming wells with 4 wells currently flowing. 17 wells and their sidetracks have been drilled off of the A Platform; 11 of these wellbores were drilled with their bottom-hole in the Eugene Island 329 Block.

As of May 2018, the current daily production rate from the A Platform is 102 BOPD + 436 MCFPD + 525 BWPD. Only the A001, A011 (bottom hole location in Eugene Island Block 329), A013 (bottom hole location in Eugene Island Block 316), and the A015 (bottom hole location in Eugene Island Block 329) are currently producing.

(b) Transportation System

Oil hydrocarbons will depart Eugene Island 315 A via an existing 6-inch *Right-of-Way* pipeline, Segment No. 6852, which terminates at Eugene Island 330 14-inch SSTI. Gas hydrocarbons will depart Eugene Island 315 A via an existing 8-inch *Right-of-Way* pipeline, Segment No. 7109, which terminates at Eugene Island 330 12-inch SSTI.

(c) Produced Liquid Hydrocarbons Transportation Vessels

There will not be any transfers of liquid hydrocarbons other than via pipeline.

SECTION N
SUPPORT VESSELS AND AIRCRAFT INFORMATION

(a) General

The most practical, direct route from the shorebase as permitted by weather and traffic conditions will be utilized.

Type	Maximum Fuel Tank Capacity	Maximum Number in Area at Any Time	Trip Frequency or Duration
Tug Boats	3,000 bbls	2	As Needed
Crew Boat	400 bbls	1	3 trips / week
Supply Boat	2,380 bbls	1	3 trips / week
Helicopter	760 gallons	1	As Needed

(b) Diesel Oil Supply Vessels

This table is not required for the location of the activities proposed in this plan per NTL 2008-G04.

(c) Drilling Fluid Transportation

This table is not required for the location of the activities proposed in this plan per NTL 2008-G04.

(d) Solid and Liquid Waste Transportation

This table is not required for the location of the activities proposed in this plan per NTL 2008-G04.

(e) Vicinity Map

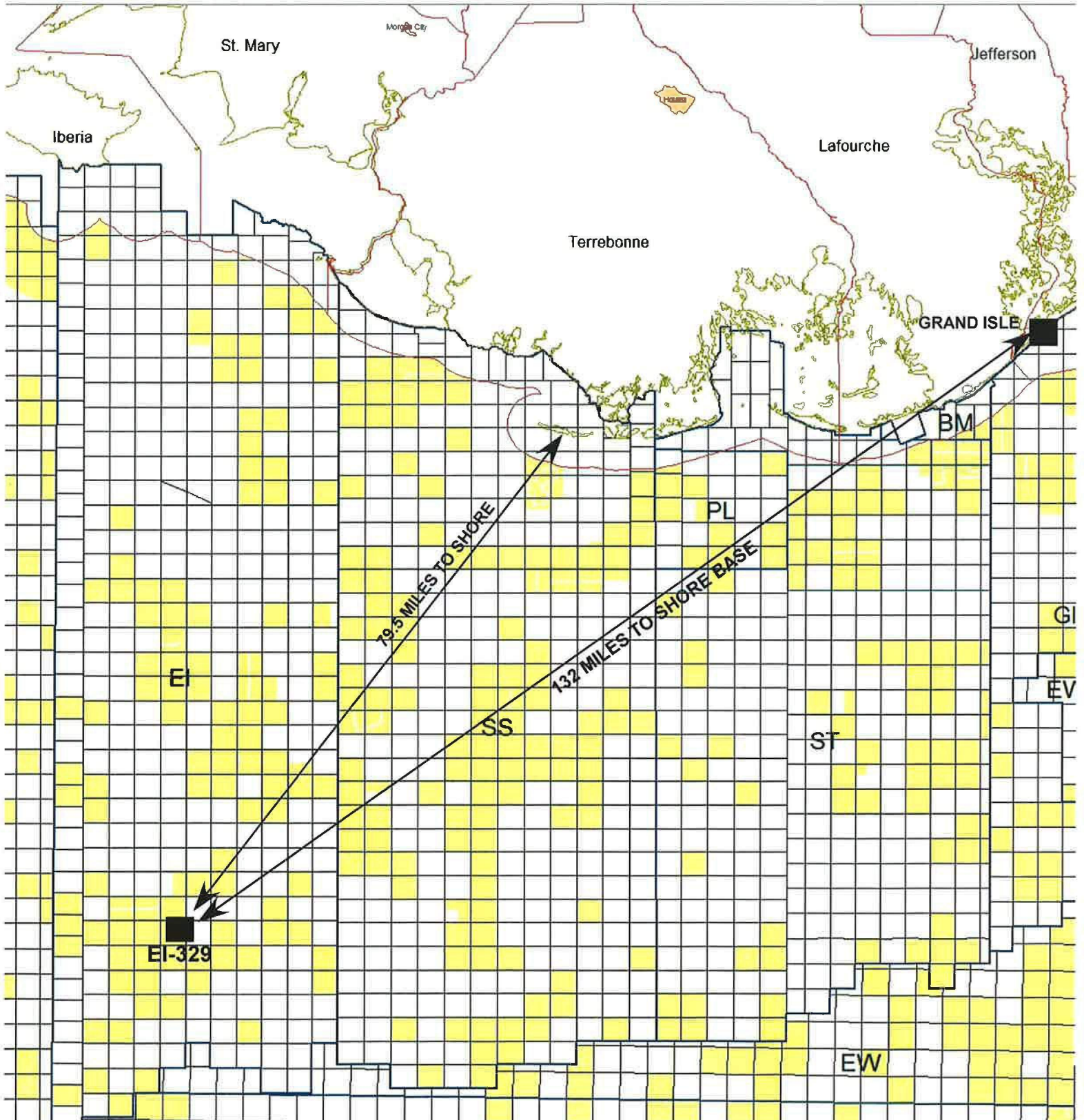
A vicinity map showing the location of the activities proposed herein relative to the shoreline with the distance of the proposed activities from the shoreline and the primary route(s) of the support vessels and aircraft that will be used when traveling between the onshore support facilities and the drilling unit.

The map is attached under this section as *Attachment N-1*.

Attachments

- 1) Vicinity Map (*Attachment N-1*)

SUPPLEMENTAL DOCD EI-315 OCS-G-02112 & EI-329 OCS-G-02912 VICINITY MAP



SECTION O
ONSHORE SUPPORT FACILITIES INFORMATION

(a) General

The table below is the onshore facilities that will be used to provide supply and service support for the proposed activities under this plan:

Name	Location	Existing/New/Modified
Grand Isle: Fieldwood Energy Dock	4529 Highway 1 Grand Isle, LA 70358	Existing

(b) Support Base Construction or Expansion

There will be no new construction of an onshore support base, nor will we expand the existing shorebase as a result of the operations proposed in this SDOCD.

(c) Support Base Construction or Expansion Timetable

Fieldwood will not expand the existing shorebase as a result of the operations proposed in this SDOCD.

(d) Waste Disposal

Name/Location of Facility	Type of Waste	Amount	Disposal Method
R360: Fourchon, LA	Completion Fluid	200 bbls	Environmental drum/tote tank to shorebase; trucked to recycling facility
R360: Fourchon, LA	Trash and Debris	3,000 cu ft.	Storage bins to shorebase; trucked to recycling facility

SECTION P
COASTAL ZONE MANAGEMENT (CZMA) INFORMATION

A certificate of Coastal Zone Management Consistency for the state(s) is not required under NTL 2008-G04 for Supplemental Development Operations Coordination Document.

SECTION Q
ENVIRONMENTAL IMPACT ANALYSIS (EIA)

In accordance with the requirements of 30 CFR 550.227 and 550.261 an Environmental Impact Analysis (EIA) is enclosed as **Attachment Q-1**.

Attachments

1) Environmental Impact Analysis (*Attachment Q-1*)

Fieldwood Energy LLC (Fieldwood)

Supplemental Development Operations Coordination Document Eugene Island Block 329 OCS-G 02912

(A) IMPACT PRODUCING FACTORS

ENVIRONMENTAL IMPACT ANALYSIS WORKSHEET

Environment Resources	Impact Producing Factors (IPFs) Categories and Examples Refer to recent GOM OCS Lease Sale EIS for a more complete list of IPFs					
	Emissions (air, noise, light, etc.)	Effluents (muds, cutting, other discharges to the water column or seafloor)	Physical disturbances to the seafloor (rig or anchor emplacements, etc.)	Wastes sent to shore for treatment or disposal	Accidents (e.g., oil spills, chemical spills, H ₂ S releases)	Discarded Trash & Debris
Site-specific at Offshore Location						
Designated topographic features		(1)	(1)		(1)	
Pinnacle Trend area live bottoms		(2)	(2)		(2)	
Eastern Gulf live bottoms		(3)	(3)		(3)	
Benthic communities			(4)			
Water quality		X	X		X	
Fisheries		X	X		X	
Marine Mammals	X(8)	X			X(8)	X
Sea Turtles	X(8)	X			X(8)	X
Air quality	X(9)					
Shipwreck sites (known or potential)			X(7)			
Prehistoric archaeological sites			X(7)			
Vicinity of Offshore Location						
Essential fish habitat		X	X		X(6)	
Marine and pelagic birds	X				X	X
Public health and safety					(5)	
Coastal and Onshore						
Beaches					X(6)	X
Wetlands					X(6)	
Shore birds and coastal nesting birds					X(6)	X
Coastal wildlife refuges					X	
Wilderness areas					X	

Footnotes for Environmental Impact Analysis Matrix

- 1) Activities that may affect a marine sanctuary or topographic feature. Specifically, if the well or platform site or any anchors will be on the seafloor within the:
 - 4-mile zone of the Flower Garden Banks, or the 3-mile zone of Stetson Bank;
 - 1000-m, 1-mile or 3-mile zone of any topographic feature (submarine bank) protected by the Topographic Features Stipulation attached to an OCS lease;
 - Essential Fish Habitat (EFH) criteria of 500 ft. from any no-activity zone; or
 - Proximity of any submarine bank (500 ft. buffer zone) with relief greater than 2 meters that is not protected by the Topographic Features Stipulation attached to an OCS lease.
- 2) Activities with any bottom disturbance within an OCS lease block protected through the Live Bottom (Pinnacle Trend) Stipulation attached to an OCS lease.
- 3) Activities within any Eastern Gulf OCS block where seafloor habitats are protected by the Live Bottom (Low-Relief) Stipulation attached to an OCS lease.
- 4) Activities on blocks designated by the BOEM as being in water depths 300 meters or greater.
- 5) Exploration or production activities where H₂S concentrations greater than 500 ppm might be encountered.
- 6) All activities that could result in an accidental spill of produced liquid hydrocarbons or diesel fuel that you determine would impact these environmental resources. If the proposed action is located a sufficient distance from a resource that no impact would occur, the EIA can note that in a sentence or two.
- 7) All activities that involve seafloor disturbances, including anchor emplacements, in any OCS block designated by the BOEM as having high-probability for the occurrence of shipwrecks or prehistoric sites, including such blocks that will be affected that are adjacent to the lease block in which your planned activity will occur. If the proposed activities are located a sufficient distance from a shipwreck or a prehistoric site that no impact would occur, the EIA can note that in a sentence or two.
- 8) All activities that you determine might have an adverse effect on endangered or threatened marine mammals or sea turtles or their critical habitats.
- 9) Production activities that involve transportation of produced fluids to shore using shuttle tankers or barges.

(B) ANALYSIS

Site-Specific at Eugene Island Block 329

Proposed operations consist of the drilling and completion of one bottom location in Eugene Island Block 329. The surface location will be in Eugene Island Block 315.

Operations will be conducted with a jack up rig.

1. Designated Topographic Features

Potential IPFs on topographic features include physical disturbances to the seafloor, effluents, and accidents.

Physical disturbances to the seafloor: Eugene Island Block 329 is not one of the identified blocks affected by the topographic features stipulation; therefore, no adverse impacts are expected.

Effluents: Eugene Island Block 329 is not one of the identified blocks affected by the topographic features stipulation; therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5, Water Quality**). Oil spills cause damage to benthic organisms only if the oil contacts the organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on corals. Because the crests of topographic features in the Northern Gulf of Mexico are found below 10 m, no oil from a surface spill could reach their sessile biota. Oil from a subsurface spill is not applicable due to the distance of these blocks from a topographic area. The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions and wastes sent to shore for disposal) from the proposed activities, which could impact topographic features.

2. Pinnacle Trend Area Live Bottoms

Potential IPFs on pinnacle trend area live bottoms include physical disturbances to the seafloor, effluents, and accidents.

Physical disturbances to the seafloor: Eugene Island Block 329 is not one of the identified blocks affected by the live bottom (pinnacle trend) stipulation; therefore, no adverse impacts are expected.

Effluents: Eugene Island Block 329 is not one of the identified blocks affected by the live bottom (pinnacle trend) stipulation; therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5, Water Quality**). Oil spills have the potential to foul benthic communities and cause lethal and sublethal effects on live bottom organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on marine organisms. Oil from a subsurface spill is not applicable due to the distance of these blocks from a live bottom (pinnacle trend) area. The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions and wastes sent to shore for disposal) from the proposed activities which could impact a live bottom (pinnacle trend) area.

3. Eastern Gulf Live Bottoms

Potential IPFs on Eastern Gulf live bottoms include physical disturbances to the seafloor, effluents, and accidents.

Physical disturbances to the seafloor: Eugene Island Block 329 is not located in an area characterized by the existence of live bottoms, and this lease does not contain a Live-Bottom Stipulation requiring a photo documentation survey and survey report.

Effluents: Eugene Island Block 329 is not located in an area characterized by the existence of live bottoms; therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5, Water Quality**). Oil spills cause damage to live bottom organisms only if the oil contacts the organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on marine invertebrates. Oil from a subsurface spill is not applicable due to the distance of these blocks from a live bottom area. The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions and wastes sent to shore for disposal) from the proposed activities which could impact an Eastern Gulf live bottom area.

4. Benthic Communities

Eugene Island 329 is located in water depth of 240 feet, which is less than the deepwater definition of 984 feet (300 meters). Eugene Island 329 is not a known benthic community site; therefore, no adverse impacts are expected.

Physical disturbances to the seafloor: Eugene Island 329 is not a known benthic community site, as listed in NTL 2009-G40. This Revised Development Operations Coordination Document submittal includes the required maps, analyses, and statement(s). The proposed activities will be contacted in accordance with NTL 2009-G40, which will ensure that features or areas that could support high-density benthic communities will not be impacted.

There are no other IPFs (including emissions, effluents, wastes sent to shore for disposal, or accidents) from the proposed activities which could impact benthic communities.

5. Water Quality

IPFs that could result in water quality degradation from the proposed operations in Eugene Island Block 329 include disturbances to the seafloor, effluents and accidents.

Physical disturbances to the seafloor: Bottom area disturbances resulting from the emplacement of drill rigs, the drilling of wells and the installation of platforms and pipelines would increase water-column turbidity and re-suspension of any accumulated pollutants, such as trace metals and excess nutrients. This would cause short-lived impacts on water quality conditions in the immediate vicinity of the emplacement operations.

Effluents: Levels of contaminants in drilling muds and cuttings and produced water discharges, discharge-rate restrictions and monitoring and toxicity testing are regulated by the EPA NPDES permit, thereby eliminating many significant biological or ecological effects. Operational discharges are not expected to cause significant adverse impacts to water quality.

Accidents: Oil spills have the potential to alter offshore water quality; however, it is unlikely that an accidental surface or subsurface spill would occur from the proposed activities. Between 1980 and 2000, OCS operations produced 4.7 billion barrels of oil and spilled only 0.001 percent of this oil, or 1 bbl for every 81,000 bbl produced. The spill risk related to a diesel spill from drilling operations is even less. Between 1976 and 1985, (years for which data were collected), there were 80 reported diesel spills greater than one barrel associated with drilling activities. Considering that there were 11,944 wells drilled, this is a 0.7 percent probability of an occurrence. If a spill were to occur, the water quality of marine waters would be temporarily affected by the dissolved components and small oil droplets. Dispersion by currents and microbial degradation would remove the oil from the water column and dilute the constituents to background levels. Historically, changes in offshore water quality from oil spills have only been detected during the life of the spill and up to several months afterwards. Most of the components of oil are insoluble in water and therefore float. The activities proposed in this plan will be covered by Fieldwood's Regional Oil Spill Response Plan (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, physical disturbances to the seafloor, and wastes sent to shore for disposal) from the proposed activities which could cause impacts to water quality.

6. Fisheries

IPFs that could cause impacts to fisheries as a result of the proposed operations in Eugene Island Block 329 include physical disturbances to the seafloor, effluents and accidents.

Physical disturbances to the seafloor: The emplacement of a structure or drilling rig results in minimal loss of bottom trawling area to commercial fishermen. Pipelines cause gear conflicts which result in losses of trawls and shrimp catch, business downtime and vessel damage. Most financial losses from gear conflicts are covered by the Fishermen's Contingency Fund (FCF). The emplacement and removal of facilities are not expected to cause significant adverse impacts to fisheries.

Effluents: Effluents such as drilling fluids and cuttings discharges contain components and properties which are detrimental to fishery resources. Moderate petroleum and metal contamination of sediments and the water column can occur out to several hundred meters down-current from the discharge point. Offshore discharges are expected to disperse and dilute to very near background levels in the water column or on the seafloor within 3,000 m of the discharge point, and are expected to have negligible effect on fisheries.

Accidents: An accidental oil spill has the potential to cause some detrimental effects on fisheries; however, it is unlikely that such an event would occur from the proposed activities (refer to **Item 5**, Water Quality). The effects of oil on mobile adult finfish or shellfish would likely be sublethal and the extent of damage would be reduced to the capacity of adult fish and shellfish to avoid the spill, to metabolize hydrocarbons, and to excrete both metabolites and parent compounds. The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

There are no IPFs from emissions, or wastes sent to shore for disposal from the proposed activities which could cause impacts to fisheries.

7. Marine Mammals

GulfCet II studies revealed that cetaceans of the continental shelf and shelf-edge were almost exclusively bottlenose dolphin and Atlantic spotted dolphin. Squid eaters, including dwarf and pygmy killer whale, Risso's dolphin, rough-toothed dolphin, and Cuvier's beaked whale, occurred most frequently along the upper slope in areas outside of anticyclones. IPFs that could cause impacts to marine mammals as a result of the proposed operations in Eugene Island Block 329 include emissions, effluents, discarded trash and debris, and accidents.

Emissions: Noises from drilling activities, support vessels and helicopters may elicit a startle reaction from marine mammals. This reaction may lead to disruption of marine mammals' normal activities. Stress may make them more vulnerable to parasites, disease, environmental contaminants, and/or predation (Majors and Myrick, 1990). There is little conclusive evidence for long-term displacements and population trends for marine mammals relative to noise.

Effluents: Drilling fluids and cuttings discharges contain components which may be detrimental to marine mammals. Most operational discharges are diluted and dispersed upon release. Any potential impact from drilling fluids would be indirect, either as a result of impacts on prey items or possibly through ingestion in the food chain (API, 1989).

Discarded trash and debris: Both entanglement in, and ingestion of debris have caused the death or serious injury of marine mammals (Laist, 1997; MMC, 1999). The limited amount of marine debris, if any, resulting from the proposed activities is not expected to substantially harm marine mammals. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

Fieldwood will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from Fieldwood management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

Accidents: Collisions between support vessels and cetaceans would be unusual events, however should one occur, death or injury to marine mammals is possible. Contract vessel operators can avoid marine mammals and reduce potential deaths by maintaining a vigilant watch for marine mammals and maintaining a safe distance when they are sighted. Vessel crews should use a reference guide to help identify the twenty-eight species of whales and dolphins, and the single species of manatee that may be encountered in the Gulf of Mexico OCS. Vessel crews must report sightings of any injured or dead protected marine mammal species immediately,

regardless of whether the injury or death is caused by their vessel, to the Marine Mammal and Sea Turtle Stranding Hotline at (888) 404-3922, the NMFS Southeast Regional Office at (727) 824-5312, or the Marine Mammal Stranding Network at (305) 862-2850. In addition, if the injury or death was caused by a collision with a contract vessel, the BOEM must be notified within 24 hours of the strike by email to protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

Oil spills have the potential to cause sublethal oil-related injuries and spill-related deaths to marine mammals. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5, Water Quality**). Oil spill response activities may increase vessel traffic in the area, which could add to changes in cetacean behavior and/or distribution, thereby causing additional stress to the animals. The effect of oil dispersants on cetaceans is not known. The acute toxicity of oil dispersant chemicals included in Fieldwood's OSRP is considered to be low when compared with the constituents and fractions of crude oils and diesel products. The activities proposed in this plan will be covered by Fieldwood's OSRP (refer to information submitted in accordance with **Appendix H**).

There are no other IPFs (including physical disturbances to the seafloor) from the proposed activities which could impact marine mammals.

8. Sea Turtles

IPFs that could cause impacts to sea turtles as a result of the proposed operations include emissions, effluents, discarded trash and debris, and accidents. GulfCet II studies sighted most loggerhead, Kemp's ridley and leatherback sea turtles over shelf waters. Historically these species have been sighted up to the shelf's edge. They appear to be more abundant east of the Mississippi River than they are west of the river (Fritts et al., 1983b; Lohofener et al., 1990). Deep waters may be used by all species as a transitory habitat.

Emissions: Noise from drilling activities, support vessels, and helicopters may elicit a startle reaction from sea turtles, but this is a temporary disturbance.

Effluents: Drilling fluids and cuttings discharges are not known to be lethal to sea turtles. Most operational discharges are diluted and dispersed upon release. Any potential impact from drilling fluids would be indirect, either as a result of impacts on prey items or possibly through ingestion in the food chain (API, 1989).

Discarded trash and debris: Both entanglement in, and ingestion of, debris have caused the death or serious injury of sea turtles (Balazs, 1985). The limited amount of marine debris, if any, resulting from the proposed activities is not expected to substantially harm sea turtles. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies

including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). Fieldwood will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), “Think About It” (*previously “All Washed Up: The Beach Litter Problem”*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from Fieldwood management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

Accidents: Collisions between support vessels and sea turtles would be unusual events, however should one occur, death or injury to sea turtles is possible. Contract vessel operators can avoid sea turtles and reduce potential deaths by maintaining a vigilant watch for sea turtles and maintaining a safe distance when they are sighted. Vessel crews should use a reference guide to help identify the five species of sea turtles that may be encountered in the Gulf of Mexico OCS. Vessel crews must report sightings of any injured or dead protected sea turtle species immediately, regardless of whether the injury or death is caused by their vessel, to the Marine Mammal and Sea Turtle Stranding Hotline at (888) 404-3922, the NMFS Southeast Regional Office at (727) 824-5312, or the Marine Mammal Stranding Network at (305) 862-2850. In addition, if the injury or death was caused by a collision with a contract vessel, the BOEM must be notified within 24 hours of the strike by email to protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

All sea turtle species and their life stages are vulnerable to the harmful effects of oil through direct contact or by fouling of their food. Exposure to oil can be fatal, particularly to juveniles and hatchlings. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Oil spill response activities may increase vessel traffic in the area, which could add to the possibility of collisions with sea turtles. The activities proposed in this plan will be covered by Fieldwood’s Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix H**).

There are no other IPFs (including physical disturbances to the seafloor) from the proposed activities which could impact sea turtles.

9. Air Quality

Eugene Island Block 329 is located 202 miles from the Breton Wilderness Area and 79 miles from shore. Applicable emissions data is included in **Appendix G** of the Plan.

There would be a limited degree of air quality degradation in the immediate vicinity of the proposed activities. Plan Emissions for the proposed activities do not exceed the annual exemption levels as set forth by BOEM. Accidents and blowouts can release hydrocarbons or chemicals, which could cause the emission of air pollutants. However, these releases would not impact onshore air quality because of the prevailing atmospheric conditions, emission height, emission rates, and the distance of Eugene Island Block 329 from the coastline. There are no other IPFs (including effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal) from the proposed activities which would impact air quality.

10. Shipwreck Sites (known or potential)

IPFs that could cause impacts to known or unknown shipwreck sites as a result of the proposed operations in Eugene Island Block 329 are disturbances to the seafloor.

Physical Disturbances to the seafloor: Eugene Island Block 329 is not located within the area designated by BOEM as high-probability for occurrence of shipwrecks. Fieldwood will report to BOEM the discovery of any evidence of a shipwreck and make every reasonable effort to preserve and protect that cultural resource.

Accidents: An accidental oil spill has the potential to cause some detrimental effects to shipwreck sites if the release were to occur subsea. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Fieldwood's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix H**).

There are no other IPFs (including emissions, effluents, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to shipwreck sites.

11. Prehistoric Archaeological Sites

IPFs that could cause impacts to prehistoric archaeological sites as a result of the proposed operations in Eugene Island Block 329 are physical disturbances to the seafloor and accidents (oil spills).

Physical Disturbances to the seafloor: Eugene Island Block 329 is located inside the Archaeological Prehistoric high probability lines. Fieldwood will report to BOEM the discovery of any object of prehistoric archaeological significance and make every reasonable effort to preserve and protect that cultural resource.

Accidents: An accidental oil spill has the potential to cause some detrimental effects to prehistoric archaeological sites if the release were to occur subsea. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Fieldwood's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix H**).

There are no other IPFs (including emissions, effluents, wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to prehistoric archaeological sites.

Vicinity of Offshore Location

1. Essential Fish Habitat (EFH)

IPFs that could cause impacts to EFH as a result of the proposed operations in Eugene Island Block 329 include physical disturbances to the seafloor, effluents and accidents. EFH includes all estuarine and marine waters and substrates in the Gulf of Mexico.

Physical disturbances to the seafloor: The Live Bottom Low Relief Stipulation, the Live Bottom (Pinnacle Trend) Stipulation, and the Eastern Gulf Pinnacle Trend Stipulation would prevent most of the potential impacts on live-bottom communities and EFH from bottom disturbing activities (e.g., anchoring, structure emplacement and removal).

Effluents: The Live Bottom Low Relief Stipulation, the Live Bottom (Pinnacle Trend) Stipulation, and the Eastern Gulf Pinnacle Trend Stipulation would prevent most of the potential impacts on live-bottom communities and EFH from operational waste discharges. Levels of contaminants in drilling muds and cuttings and produced-water discharges, discharge-rate restrictions, and monitoring and toxicity testing are regulated by the EPA NPDES permit, thereby eliminating many significant biological or ecological effects. Operational discharges are not expected to cause significant adverse impacts to EFH.

Accidents: An accidental oil spill has the potential to cause some detrimental effects on EFH. Oil spills that contact coastal bays and estuaries, as well as OCS waters when pelagic eggs and larvae are present, have the greatest potential to affect fisheries. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact essential fish habitat.

2. Marine and Pelagic Birds

IPFs that could impact marine birds as a result of the proposed activities include air emissions, accidental oil spills, and discarded trash and debris from vessels and the facilities.

Emissions: Emissions of pollutants into the atmosphere from these activities are far below concentrations which could harm coastal and marine birds.

Accidents: An oil spill would cause localized, low-level petroleum hydrocarbon contamination. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Marine and pelagic birds feeding at the spill location may experience chronic, nonfatal, physiological stress. It is expected that few, if any, coastal and marine birds would actually be affected to that extent. The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Marine and pelagic birds could become entangled and snared in discarded trash and debris, or ingest small plastic debris, which can cause permanent injuries and death. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). Fieldwood will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from Fieldwood management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE. Debris, if any, from these proposed activities will seldom interact with marine and pelagic birds; therefore, the effects will be negligible.

There are no other IPFs (including effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact marine and pelagic birds.

3. Public Health and Safety Due to Accidents.

There are no IPFs (emissions, effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal or accidents, including an accidental H₂S releases) from the proposed activities which could cause impacts to public health and safety. In accordance with NTL No.'s 2008-G04, 2009-G27, and 2009-G31, sufficient information is included in **Appendix D** to justify our request that our proposed activities be classified by BSEE as H₂S absent.

Coastal and Onshore

1. Beaches

IPFs from the proposed activities that could cause impacts to beaches include accidents (oil spills) and discarded trash and debris.

Accidents: Oil spills contacting beaches would have impacts on the use of recreational beaches and associated resources. Due to the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Trash on the beach is recognized as a major threat to the enjoyment and use of beaches. There will only be a limited amount of marine debris, if any, resulting from the proposed activities. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). Fieldwood will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from Fieldwood management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact beaches.

2. Wetlands

Salt marshes and seagrass beds fringe the coastal areas of the Gulf of Mexico. Due to the distance from shore (79 miles), accidents (oil spills) and discarded trash and debris represent IPFs which could impact these resources.

Accidents: Level of impact from an oil spill will depend on oil concentrations contacting vegetation, kind of oil spilled, types of vegetation affected, season of the year, pre-existing stress level of the vegetation, soil types, and numerous other factors. Light-oiling impacts will cause plant die-back with recovery within two growing seasons without artificial replanting. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water quality). If a spill were to occur, response capabilities as outlined in Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**) would be implemented.

Discarded trash and debris: There will only be a limited amount of marine debris, if any, resulting from the proposed activities. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). Fieldwood will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from Fieldwood management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to wetlands.

3. Shore Birds and Coastal Nesting Birds

Accidents: Oil spills could cause impacts to shore birds and coastal nesting birds. The birds most vulnerable to direct effects of oiling include those species that spend most of their time swimming on and under the sea surface, and often aggregate in dense flocks (Piatt et al., 1990; Vauk et al., 1989). Coastal birds, including shorebirds, waders, marsh birds, and certain water fowl, may be the hardest hit indirectly through destruction of their feeding habitat and/or food source (Hansen, 1981; Vermeer and Vermeer, 1975). Direct oiling of coastal birds and certain seabirds is usually minor; many of these birds are merely stained as a result of their foraging behaviors. Birds can ingest oil when feeding on contaminated food items or drinking contaminated water.

Oil-spill cleanup operations will result in additional disturbance of coastal birds after a spill. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water quality). Due to the distance from shore being 79 miles, Fieldwood would immediately implement the response capabilities outlined in their Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Shore birds and coastal nesting birds are highly susceptible to entanglement in floating, submerged, and beached marine debris: specifically plastics. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). Fieldwood will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), “Think About It” (*previously “All Washed Up: The Beach Litter Problem”*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from Fieldwood management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to shore birds and coastal nesting birds.

4. Coastal Wildlife Refuges

Accidents: It is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water quality). Response capabilities would be implemented, no impacts are expected. The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V, the Marine Plastic Pollution Research and Control Act and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). Fieldwood will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from Fieldwood management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to coastal wildlife refuges.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to coastal wildlife refuges.

5. Wilderness Areas

Accidents: An accidental oil spill from the proposed activities could cause impacts to wilderness areas. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5, Water Quality**). Due to the distance from the nearest designated Wilderness Area (202 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by Fieldwood's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V, the Marine Plastic Pollution Research and Control Act and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). Fieldwood will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from Fieldwood management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to wilderness areas.

6. Other Environmental Resources Identified

There are no other environmental resources identified for this impact assessment.

(C) IMPACTS ON PROPOSED ACTIVITIES

The site-specific environmental conditions have been taken into account for the proposed activities. No impacts are expected on the proposed activities from site-specific environmental conditions.

(D) ENVIRONMENTAL HAZARDS

During the hurricane season, June through November, the Gulf of Mexico is impacted by an average of ten tropical storms (39-73 mph winds), of which six become hurricanes (> 74 mph winds). Due to its location in the gulf, Eugene Island Block 329 may experience hurricane and tropical storm force winds, and related sea currents. These factors can adversely impact the integrity of the operations covered by this plan. A significant storm may present physical hazards to operators and vessels, damage exploration or production equipment, or result in the release of hazardous materials (including hydrocarbons). Additionally, the displacement of equipment may disrupt the local benthic habitat and pose a threat to local species.

The following preventative measures included in this plan may be implemented to mitigate these impacts:

1. Drilling & completion
 - a. Secure well
 - b. Secure rig / platform
 - c. Evacuate personnel

Drilling activities will be conducted in accordance with NTL No.'s 2008-G09, 2009-G10, and 2010-N10 .

(E) ALTERNATIVES

No alternatives to the proposed activities were considered to reduce environmental impacts.

(F) MITIGATION MEASURES

No mitigation measures other than those required by regulation will be employed to avoid, diminish, or eliminate potential impacts on environmental resources.

(G) CONSULTATION

No agencies or persons were consulted regarding potential impacts associated with the proposed activities. Therefore, a list of such entities has not been provided.

(H) PREPARER(S)

Marla Begnaud
Fieldwood Energy LLC
2014 W Pinhook Road, Suite 800
Lafayette, LA 70508
(337) 354-8039
marla.begnaud@fwellc.com

(I) REFERENCES

Authors:

- American Petroleum Institute (API). 1989. Effects of offshore petroleum operations on cold water marine mammals: a literature review. Washington, DC: American Petroleum Institute. 385 pp.
- Balazs, G.H. 1985. Impact of ocean debris on marine turtles: entanglement and ingestion. In: Shomura, R.S. and H.O. Yoshida, eds. Proceedings, Workshop on the Fate and Impact of Marine Debris, 26-29 November 1984, Honolulu, HI. U.S. Dept. of Commerce. NOAA Tech. Memo. NOAA-TM-NMFS-SWFC-54. Pp 387-429.
- Burke, C.J. and J.A. Veil. 1995. Potential benefits from regulatory consideration of synthetic drilling muds. Environmental Assessment Division, Argonne National Laboratory, ANL/EAD/TM-43.
- Daly, J.M. 1997. Controlling the discharge of synthetic-based drilling fluid contaminated cuttings in waters of the United States. U.S. Environmental Protection Agency, Office of Water. Work Plan, June 24, 1997.
- Hansen, D.J. 1981. The relative sensitivity of seabird populations in Alaska to oil pollution. U.S. Dept. of the Interior, Bureau of Land Management, Alaska OCS Region, Anchorage. BLM-YK-ES-81-006-1792.
- Laist, D.W. 1997. Impacts of marine debris: entanglement of marine life in marine debris including a comprehensive list of species with entanglement and ingestion records. In: Coe, J.M. and D.B. Rogers, eds. Marine debris: sources, impacts, and solutions. New York, NY: Springer-Verlag. Pp. 99-139.
- Majors, A.P. and A.C. Myrick, Jr. 1990. Effects of noise on animals: implications for dolphins exposed to seal bombs in the eastern tropical Pacific purse-seine fishery—an annotated bibliography. NOAA Administrative Report LJ-90-06.
- Marine Mammal Commission. 1999. Annual report to Congress – 1998.
- Piatt, J.F., C.J. Lensink, W. Butler, M. Kendziorek, and D.R. Nysewander. 1990. Immediate impact of the Exxon Valdez oil spill on marine birds. *The Auk*. 107 (2): 387-397.

Vauk , G., E. Hartwig, B. Reineking, and E. Vauk-Hentzelt. 1989. Losses of seabirds by oil pollution at the German North Sea coast. *Topics in Marine Biology*. Ros, J.D, ed. *Scient. Mar.* 53 (2-3): 749-754.

Vermeer, K. and R. Vermeer, 1975 Oil threat to birds on the Canadian west coast. *The Canadian Field-Naturalist*. 89:278-298.

Although not cited, the following were utilized in preparing this EIA:

- Hazard Surveys
- BOEM EIS's:
 - GOM Deepwater Operations and Activities. Environmental Assessment. MMS 2000-001
 - GOM Central and Western Planning Areas Sales 166 and 168 Final Environmental Impact Statement. MMS 96-0058.

SECTION R
ADMINISTRATIVE INFORMATION

(a) Exempted Information Description

The proposed bottom-hole location of the planned well has been removed from the public information copy of the SDOCD as well as any discussions of the target objectives, geologic or geophysical data, and any interpreted geology.

(b) Bibliography