

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF OCEAN ENERGY MANAGEMENT
GULF OF MEXICO OCS REGION
NEW ORLEANS, LOUISIANA

SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT

OF

EXPLORATION PLAN
NO. S-7932

FOR

KOSMOS ENERGY GULF OF MEXICO OPERATIONS, LLC

March 26, 2019

RELATED ENVIRONMENTAL DOCUMENT

Gulf of Mexico OCS Oil and Gas Lease Sales: 2017-2022
Gulf of Mexico Lease Sales 249, 250, 251, 252, 253, 254, 256, 257, 259, and 261
Final Environmental Impact Statement
(OCS EIS/EA BOEM 2017-009)

Gulf of Mexico OCS Lease Sale
Final Supplemental Environmental Impact Statement 2018
(OCS EIS/EA BOEM 2017-074)

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

The Bureau of Ocean Energy Management (BOEM) has prepared a Site-Specific Environmental Assessment (SEA) (No. S-7932) complying with the National Environmental Policy Act (NEPA). NEPA regulations under the Council on Environmental Quality (CEQ) (40 CFR § 1501.3 and § 1508.9), the Department of the Interior (DOI) NEPA implementing regulations (43 CFR § 46), and BOEM policy require an evaluation of proposed major federal actions, which under BOEM jurisdiction includes approving a plan for oil and gas exploration or development activity on the Outer Continental Shelf (OCS).

NEPA regulation 40 CFR § 1508.27(b) requires significance to be evaluated in terms of context and intensity. The context and intensity of impacts caused by similar actions to that proposed were examined at a basin-wide scale in the Gulf of Mexico (GOM) in the following NEPA document:

- Gulf of Mexico OCS Oil and Gas Lease Sales: 2017-2022 Gulf of Mexico Lease Sales 249, 250, 251, 252, 253, 254, 256, 257, 259, and 261-Final Environmental Impact Statement (Multisale EIS) (OCS EIS/EA BOEM 2017-009) and
- Gulf of Mexico OCS Lease Sale, Final Supplemental Environmental Impact Statement 2018 (2018 SEIS) (OCS EIS/EA BOEM 2017-074).

The Proposed Action: Kosmos Energy Gulf of Mexico Operations, LLC's (Kosmos) Supplemental Exploration Plan for drilling operations on the OCS of the GOM proposes to explore for hydrocarbons by drilling, and completing 4 respud exploration wells (Wells Respuds C, D, E, and F) if complications arise when drilling Well B (R-6767). These wells are located in Mississippi Canyon Block 727; Lease Number OCS-G 24102; located in the Central Planning Area of the Gulf of Mexico. The proposed activities are located approximately 54 miles (87 kilometers) southwest of the nearest shoreline in Plaquemines Parish, Louisiana. The water depths at the proposed well sites range from 4,817 – 4,975 feet (1,468 – 1,516 meters). Kosmos proposes using a drillship or dynamically positioned semisubmersible as their mobile offshore drilling unit to drill these wells.

Resources and Impacts Considered: The context and intensity of the proposed action are further analyzed at the site-specific level in the environmental assessment. The impact analysis for the proposed activity focused on the developmental activities and the resources that may be potentially impacted. The impact producing factors (IPFs) include: (1) air emissions; (2) drilling and overboard discharges; (3) seafloor disturbance from well emplacement; (4) vessel traffic and noise; and (5) marine trash and debris.

In this SEA BOEM has considered three alternatives: (1) the no action; (2) the proposed action as submitted; and (3) the proposed action with conditions of approval. BOEM has assessed the potential impacts of the proposed action on the following significant resources:

- 1) air quality;
- 2) water quality;
- 3) deepwater benthic communities;
- 4) marine mammals;
- 5) sea turtles;
- 6) fish resources and essential fish habitat; and
- 7) archaeological resources.

Potential impacts on these resources are summarized below. Because direct contact is potentially the most disruptive potential impact for resources fixed or lying on the sea bottom, it is weighted most heavily out of all other potentially impacting factors. Pre-activity surveys of the sea bottom required by BOEM may identify potentially sensitive deepwater benthic communities or archaeological resources. In the event that either type of resource is encountered the operator is instructed to avoid impacts to these resources and notify BOEM per the regulations. Potential impacts to unknown deepwater benthic resources will be avoided by following the guidance provided in the condition of approval below. By operators following the regulations and the regulatory guidance found in the notices to lessees and operators, potential impacts

to sensitive air quality, water quality, archaeological, marine mammals, sea turtles, and fish resources and essential fish habitat from the proposed activities were determined to be negligible.

Our evaluation in this SEA has selected Alternative 3 and serves as the basis for approving the proposed action. BOEM concludes that no significant impacts are expected to occur to any affected resources by allowing the proposed action to proceed, provided that the specific conditions of approval identified below are met by the operator. BOEM has determined that the condition of approval that has been analyzed in the Multisale EIS and 2018 SEIS and are listed below is necessary to avoid or minimize certain possible adverse effects of this action upon environmental resources.

BOEM's condition of approval is:

NON-RECURRING BENTHIC MITIGATION: There is an area capable of supporting high-density deepwater benthic communities within 2,000 ft of your proposed Well E (3). The well is 1,814 feet from the community, which in this case provides adequate protection from muds and cuttings during operations. The actual wellsite shall not be placed closer than 1,500 feet from the habitat (see attached map which depicts the area and the well under separate cover). Provide a map showing the final as-placed Well Site E, the habitat, and distance of Well Site E from the potential habitat, to the BOEM Regional Supervisor, Office of Leasing and Plans, Plans Section (MS GM1053C) at the same time you submit your End of Operations Report (Form BSEE-0125) to the appropriate BSEE GOMR District Office to demonstrate that the feature(s) were not physically impacted by the drilling activity.

Conclusion: BOEM has evaluated the potential environmental impacts of the proposed action. Based on SEA No. S-7932, we determine that the proposed action would have no significant impact on the natural and human environments provided that the avoidance measures required by the specific conditions of approval are met by the operator. Therefore, an Environmental Impact Statement will not be required.

**PERRY
BOUDREAU**

Digitally signed by PERRY BOUDREAU
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of the Interior, ou=Bureau of Ocean Energy
Management, cn=PERRY BOUDREAU,
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Date: 2019.03.26 14:21:31 -05'00'

Chief, Environmental Operations Section
BOEM Office of Environment, GOM OCS Region

March 26, 2019

Date

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SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT (SEA) PREPARED FOR KOSMOS ENERGY GULF OF MEXICO OPERATIONS, LLC'S SUPPLEMENTAL EXPLORATION PLAN: S-7932

1. OVERVIEW

The purpose of this Site-Specific Environmental Assessment (SEA) is to determine whether the proposed activities outlined in the Supplemental Exploration Plan (EP), S-7932, initially submitted by Kosmos Energy Gulf of Mexico Operations, LLC (Kosmos) on December 18, 2018 will significantly affect the quality of the human environment within the meaning of Section 102(2)(c) of the National Environmental Policy Act (NEPA) and whether an Environmental Impact Statement (EIS) must be prepared. Kosmos' Supplemental EP proposes to explore for hydrocarbons by drilling, and completing four respud wells if complications arise when drilling Well B (R-6767). All of these proposed wells are located in Mississippi Canyon Block 727, Lease Number OCS-G 24102; located in the Central Planning Area (CPA) of the Gulf of Mexico (GOM).

This SEA is tiered from multiple National Environmental Policy Act (NEPA) documents which evaluated a broad spectrum of potential impacts resulting from drilling activities across the GOM Outer Continental Shelf (OCS) that include:

- Gulf of Mexico OCS Oil and Gas Lease Sales: 2017-2022 Gulf of Mexico Lease Sales 249, 250, 251, 252, 253, 256, 257, 259, and 261 Final Environmental Impact Statement (Multisale EIS) (USDOL, BOEM, 2017a) and
- Gulf of Mexico OCS Lease Sale Final Supplemental Environmental Impact Statement 2018 (2018 SEIS) (USDOL, BOEM, 2017b).

The “tiering” process is provided for in the NEPA implementing regulations (40 CFR Part § 1502.20 and § 1508.28) and is designed to reduce and simplify the size of subsequent environmental analyses of actions included within the broader program previously examined in NEPA compliance documents by eliminating discussions of impacts that would be repetitive. This allows focus on those site-specific concerns and effects related to the specific action proposed. Document tiering in the Bureau of Ocean Energy Management (BOEM) is subject to additional guidance under Department of the Interior (DOI) regulations at 43 CFR § 46.140 wherein the site-specific analysis must note which conditions and effects addressed in the programmatic document remain valid and which conditions and effects require additional review.

Although the analyses of drilling-related impacts prepared in the Multisale EIS and 2018 SEIS are comprehensive, new information has become available with respect to the following:

- **Emission Impacts on Air Quality** – the EP contains project-specific emissions data not known during the preparation of the programmatic analyses;
- **Discharge Impacts on Offshore Water Quality** – the EP contains project-specific discharge data not known during the preparation of the programmatic analyses;
- **Bottom Impacts on Deepwater Benthic Communities** – the EP contains project-specific information not known during the preparation of the programmatic analyses;
- **Noise/Vessel-Strike Impacts on Marine Mammals** – the environmental baseline since completion of the Multisale EIS and 2018 SEIS may have experienced slight changes and new information has become available since the preparation of the programmatic analyses;
- **Noise/Vessel-Strike Impacts on Sea Turtles** – the environmental baseline since completion of the Multisale EIS and 2018 SEIS may have experienced slight changes and new information has become available since the preparation of the programmatic analyses;
- **Discharge Impacts/Disturbances to Fish and Fisheries** – the environmental baseline since completion of the Multisale EIS and 2018 SEIS may have experienced slight changes and new information has become available since the preparation of the programmatic analyses; and

- **Bottom Impacts on Potential Archaeological Resources** – the EP contains project-specific information not known during the preparation of the programmatic analyses.

Therefore, **Chapter 3** of this SEA focuses on how the new information, including a discussion of the known effects of the *Deepwater Horizon* explosion, spill, and response activities on the analyzed resources, relates to the routine, accidental, and cumulative environmental effects of this proposed action. Where applicable, relevant affected environment discussions and impact analyses from the Multisale EIS and 2018 SEIS are summarized and utilized for this site-specific analyses, and are incorporated by reference into this SEA. Relevant condition(s) of approval identified in this SEA and Multisale EIS and 2018 SEIS have been considered in the evaluation of the proposed action.

1.1. BACKGROUND

BOEM and the Bureau of Safety and Environmental Enforcement (BSEE) are mandated to manage and oversee the exploration and development of OCS oil, gas, and mineral resources while ensuring safe operations and the protection of the human, marine, and coastal environments. BOEM and BSEE issue oil and gas leases and regulates exploration, development, production, and decommissioning. Prior to authorizing activities related to these phases, BOEM conducts the appropriate NEPA review. BOEM's Office of Leasing and Plans oversees the submittal of EPs and Development Operations Coordination Documents (DOCDs) pursuant to 30 CFR § 550, subpart B.

Lessees and operators submit EPs and DOCDs to provide BOEM with information needed to adequately evaluate the overall potential impacts on OCS resources prior to seeking any individual permit approvals, such as an application for permit to drill (APD). Most of the information in EPs and DOCDs is presented in basic statements, figures, lists, and tables that simply provide the necessary details on the proposed exploration, development, production, and/or transportation operations. One exception is the Environmental Impact Analyses (EIA) required in EPs under 30 CFR § 550.227 and in DOCDs under 30 CFR § 550.261; wherein, the operator provides environmental information and makes impact conclusions regarding their activities.

The scope of the effects on the environment in the GOM from the activities proposed in Kosmos' supplemental EP were fully discussed and analyzed in the Multisale EIS and 2018 SEIS and the specific locations, equipment, methodologies, and the duration of the proposed activities will result in impacts similar to those discussed in the EIS. This SEA was prepared by BOEM to evaluate the activity-specific issues related to the applicant's proposed activities in addition to the new information.

1.2. PURPOSE OF AND NEED FOR THE PROPOSED ACTION

Kosmos has submitted a plan to conduct exploration activities on the OCS. The purpose of the proposed action is to drill and complete 4 respud wells in the event there are complications when drilling Well B (R-6767) so that Kosmos can utilize the information to evaluate the potential for, and develop plans for, the development and production of hydrocarbon resources on the OCS which would help satisfy the Nation's need for energy.

The need for this action is established by BOEM's responsibility under the Outer Continental Shelf Lands Act (OCSLA) to make OCS lands available for expeditious and orderly development, subject to environmental safeguards, in a manner that is consistent with the maintenance of competition and other national needs. Section 11 of OCSLA (43 U.S.C. § 1340) requires oil and gas lessees seeking to conduct exploration activities to first obtain approval from the Secretary who has delegated the authority to grant such approval to the BOEM.

In response to the proposed action in Kosmos' plan, BOEM is required by OCSLA to approve, approve with modifications, or deny the plan within 30 days (*see* 43 U.S.C. § 1340(c)(1)). The criteria that BOEM will apply in reaching a decision to approve, approve with modifications, or deny the plan within 30 days and the scope of its discretion are provided by Section 11 of OCSLA and detailed in the implementing regulations (30 CFR § 550, subpart B). Authorizing the proposed action as outlined in the supplemental EP, S-7932, allows Kosmos to pursue its rights under the lease and to conduct exploration drilling activities.

1.3. DESCRIPTION OF THE PROPOSED ACTION

Kosmos' Supplemental Exploration Plan for drilling operations on the OCS of the GOM proposes to explore for hydrocarbons by drilling, and completing 4 respud exploration wells (Wells Respuds C, D, E,

and F) if complications arise when drilling well B (R-6767). These wells are located in Mississippi Canyon Block 727; Lease Number OCS-G 24102; located in the Central Planning Area of the Gulf of Mexico. The proposed activities are located approximately 54 miles (87 kilometers) southwest of the nearest shoreline in Plaquemines Parish, Louisiana. The water depths at the proposed well sites range from 4,817 – 4,975 feet (1,468 – 1,516 meters). Kosmos proposes using a drillship or dynamically positioned semisubmersible as their mobile offshore drilling unit to drill these wells.

The projected duration of the proposed drilling of the wells is estimated at 229 days per well. The proposed drilling will start tentatively on April 15, 2019 and will end on November 2, 2022. Supply and crewboat facilities to support the proposed action are to be located in existing facilities in Port Fourchon, Louisiana, approximately 101 mi (163 km) northwest of the project location. Air operations (helicopter) will be based out of Galliano, Louisiana, approximately 121.5 mi (196 km) northwest of the project location. Kosmos does not expect any shore-based construction or expansion in association with this proposed action. The types of support vessels and their potential travel frequency during exploratory drilling are included in Kosmos' plan (Kosmos, 2018).

1.4. IMPACT-PRODUCING FACTORS

An impact-producing factor (IPF) is any activity or process resulting from an approved operation that causes impacts to the environment, such as an emission, effluent, or physical disturbance. The IPFs from the routine activities proposed by the operator in this plan include: (1) waste and discharges from vessel operations and exploration activities; (2) air emissions from equipment and vessels; (3) noise from vessel and helicopter transportation and drilling activities; and (4) bottom disturbances from well emplacement activities. The routine IPFs are expected to occur during the operations conducted under the proposed action and are addressed in each of the site-specific analyses in **Chapter 3** under "Routine Activities."

The analyses in **Chapter 3** also consider IPFs that might result from an accidental event. The primary IPFs from potential accidents related to OCS drilling activities include: (1) vessel collisions with marine mammals and sea turtles; (2) oil spills and blowouts; (3) bottom disturbances from lost/jettisoned debris; and (4) helicopter collisions with coastal and/or marine birds. Unlike the IPFs associated with routine activities, the IPFs from accidental events are not expected because of the low probabilities of such events from occurring, existing/recently implemented safety measures and condition(s) of approval, and an increased level of operator awareness observed since the *Deepwater Horizon* spill. The accidental IPFs are detailed and addressed in each of the site-specific analyses under "Accidental Events."

The Multisale EIS and 2018 SEIS considered the routine and accidental IPFs described above; however, additional information related to the oil spill/blowout IPF has been collected since the *Deepwater Horizon* spill that was not available during the preparation of this programmatic analyses [Appendix A: Accidental Oil-Spill Discussion \(http://www.boem.gov/Appendix-A-Deepwater-SEA-Oil-Spill-Discussion/\)](http://www.boem.gov/Appendix-A-Deepwater-SEA-Oil-Spill-Discussion/). Additionally, the analyses of the "Accidental Events" incorporate information from Appendix B of the 2012-2017 WPA/CPA Multisale EIS (USDOJ, BOEM, 2012), "Catastrophic Spill Event Analysis," to address the potential impacts to the environment in the unlikely event that a catastrophic spill similar to the *Deepwater Horizon* spill was to occur. This analysis was later updated and published as a "Catastrophic Spill Event Analysis" white paper (USDOJ, BOEM, 2017c) and hereby incorporated by reference.

Accidental Spill Concerns

Since spills are unplanned, unforeseeable events, BOEM is required to rely on past experiences to predict many factors regarding oil-spill risks. Based on experience and the operations proposed in Kosmos' Supplemental EP, the potential sources of hydrocarbon spills from the proposed activity would include the following:

- A storage tank accident on the MODU;
- A transfer operation mishap between the supply vessel and the MODU;
- A leak resulting from damage to the fuel tanks on one of the supply or crew boats; and/or
- A blowout of one of the proposed wells.

Potential Spills from Vessels/Transfer Operations

As indicated above, offshore spills from Kosmos' proposed action are possible if an accident were to damage a storage tank onboard the drilling rig, the crewboat, offshore support vessel, or the fuel supply vessel. Historically, accidents of this nature have resulted from unintentional vessel collisions and transfer incidents during the offloading of diesel fuel to the drilling rig. Kosmos plans to use either a DP semisubmersible or a drillship using a subsea blowout preventer (BOP) to conduct the proposed activities. There are several tanks onboard the MODU that store fuel and lubricants necessary for the rig's operation. A worst-case discharge scenario from a rupture and spill from the vessels are:

	<u>Largest Main Tank Capacity</u>	<u>Total Diesel Oil Capacity</u>
DP Semisubmersible	16,700 bbl	70,548 bbl
Drillship	18,000 bbl	40,904 bbl

Additionally, the crew boat proposed to support the drilling operations has an estimated fuel capacity of 500 bbl, the supply vessel has an estimated fuel capacity of 6,000 bbl, and the two fuel supply vessels have an estimated fuel capacities of 6,000 and 500 bbl. The helicopter proposed to support activities has a capacity of 260 gallons (6.2 bbl).

Potential Spills from a Loss of Well Control/Blowout

BOEM and BSEE require that all losses of well control (blowouts) be reported. The current definition for "loss of well control" used by BOEM and BSEE is:

- Uncontrolled flow of formation or other fluids. The flow may be to an exposed formation (an underground blowout) or at the surface (a surface blowout);
- flow through a diverter; or
- uncontrolled flow resulting from a failure of surface equipment or procedures.

Losses of well control (also known as blowouts) can occur during exploratory drilling, development drilling, completion, production, or workover operations. A blowout can occur when improperly balanced well pressures result in the sudden, uncontrolled releases of fluids from a wellbore or wellhead (PCCI, 1999; Neal Adams Firefighters, Inc. 1991). Since 1971, most OCS blowouts have resulted in the release of gas; blowouts resulting in the release of oil have been rare. The most recent blowout was related to the *Deepwater Horizon* spill, which resulted in the release of both gas and oil. In the event of a blowout, an operator's first course of action is to activate the BOP to close the well. The BOP may be located on the drill rig or on the seafloor. There are built-in redundancies in the BOP system to allow activation of selected components with the intent to seal off the well bore. If a subsea BOP cannot be operated from the drill rig, it can be operated at the seafloor using remotely-operated vehicles (ROVs).

If the blowout occurs during drilling, pieces of the rock formation below the drill bit may fail and collapse into the wellbore because of the pressure drop. Formation fragments subsequently clog or "bridge" the drill bit or pipe, reducing or stopping flow (PCCI, 1999). Completed wells, or those in production, present more severe consequences in the event of a blowout due to the hole being fully cased down to the producing formation that lowers the probability of bridging (PCCI, 1999).

If the BOP fails and the well does not bridge, there are other options available to control the blowout that include capping/shut-in, capping/diverting, surface stinger, vertical intervention, offset kill, and drilling relief wells (Neal Adams Firefighters, Inc. 1991). Of these methods, a relief well is the most important remedy and may be required immediately (even if it is not the first choice), since it is typically considered the ultimate solution for well control. A relief well must be drilled from a nearby platform or drillship. It is estimated that drilling a relief well in deep water can take anywhere from 30 to 120 or more. The actual amount of time required to drill the relief well will depend upon the complexity of the intervention, the location of a suitable rig, the type of operation that must be terminated in order to release the rig (e.g., may need to secure the well before releasing the rig), and any problems mobilizing personnel and equipment to the location.

Catastrophic Spill Event Analysis

After the *Deepwater Horizon* explosion, oil spill, and response, BOEM prepared a “Catastrophic Spill Event Analysis,” a region-wide evaluation that identifies the most likely and most significant impacts from a high-volume blowout and oil spill that continues for an extended period of time, which was included as Appendix B in the 2012-2017 WPA/CPA Multisale EIS (USDOJ, BOEM, 2012). Since then, this analysis has been reviewed and updated. This analysis, which is based on credible scientific evidence, identifies the most likely and most significant impacts from a high-volume blowout and oil spill that continues for an extended period of time and has been published as a “Catastrophic Spill Event Analysis” white paper (USDOJ, BOEM, 2017c). The scenario and impacts discussed in the independent white paper are comparable to that of a spill similar to the *Deepwater Horizon* spill and are not associated with IPFs anticipated to result from routine activities or even more reasonably-feasible, accidental events that could occur during the proposed action. The conclusions made in the independent white paper are addressed in the SEA’s impact analyses (Chapters 3.2 to 3.8) and hereby incorporated by reference.

Site-Specific Estimate of Spill Risk

Kosmos’ plan describes measures for blowout prevention, likelihood for surface intervention to stop blowout, and early intervention in the event of a blowout. Kosmos has developed standards for well control, personnel safety, and emergency response plan and these methods are stated in detail in the plan submitted by Kosmos (Kosmos, 2018). As per the information provided in Kosmos’ plan, the MODU Kosmos plans to use will deploy a subsea BOP while drilling the wells (Kosmos, 2018). An estimate of spill risk from Kosmos’ proposed activities was calculated using the drilling spill rate for the entire OCS and the estimated number of wells to be drilled. The resulting value, 0.00028 or 0.028 percent, is used to address the risk of a spill >1,000 bbl occurring during the proposed action. When examining only wells in deep water (in water depths >500 ft; 152 m), past data suggest the chance of a major spill from a deepwater well under current regulations and practices is 1 in 4,957 (USDOJ, BOEM, 2012).

Though not proposed or expected, Kosmos has estimated that a worst-case discharge (WCD) scenario from a blowout of one of the wells under this proposed action could be 107,728 BOPD of 35° American Petroleum Institute (API) gravity crude. In accordance with enhanced agency oversight, BOEM verified the operator’s calculations used to determine the WCD volume.

Kosmos indicated in their plan that there is significant potential for the wellbore to bridge over during the WCD blowout. Bridging is likely to occur due to the extreme drawdown calculated between the formation and the open hole section. A Merlin reservoir simulation model was used to investigate the well conditions during the WCD blowout scenario. Kosmos strives to limit the estimated total drawdown on a producing interval to reduce the risk of wellbore collapse and sand/fines migration into a well. Kosmos limits the drawdown to typically less than 4,000 psi by reducing the rates the wells produce and by completing each well with a cased hole, frac-pack completion. There is a strong likelihood of wellbore bridging over as:

- Drawdown is estimated to be nearly 3 times greater than our operating practices,
- The blowout occurs in a long open hole section of the well, with no benefit of casing or a frac-pack completion, and
- If any water zones are exposed this will accelerate wellbore collapse and bridging (Kosmos, 2018).

In the event a relief well is required, it is expected to take approximately; 16 days to assess and mobilize well spud equipment; 8 days to mobilize rig and install structural casing; 105 days to spud and drill to the top of the zone of interest and set casing; 10 days to intersect and kill the well. The total time estimated for relief well operations is 139 days. Additional details related to the proposed action can be found in Kosmos’ proposed supplemental exploration plan (Kosmos, 2018).

Spill Response Requirements

Agency regulations require that all owners and operators of oil handling, storage, or transportation facilities located seaward of the coastline submit an Oil-Spill Response Plan (OSRP) before they can use a facility. The BSEE has issued BSEE NTL No. 2012-N06 (Guidance to Owners and Operators of Offshore Facilities Seaward of the Coast Line Concerning Regional Oil Spill Response Plans), which informs operators of OSRP requirements and requires that they have adequate resources available to protect the

environment from spills from their facilities. The Environmental Protection and Response Plan within the OSRP outlines the availability of spill containment and cleanup equipment and trained personnel necessary to ensure that a full-response can be deployed during an oil-spill emergency. All of the proposed activities and facilities in this plan will be covered by the OSRP filed by Kosmos Offshore Inc. (Company Number 0003362) in accordance with 30 C.F.R. § 254, approved by BSEE May 15, 2018. Kosmos also certifies that it 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 the Plan (Kosmos, 2018).

Spill Response

Discussion about spill response is already included in Appendix A: (<http://www.boem.gov/Appendix-A-Deepwater-SEA-Oil-Spill-Discussion/>).

Oil-Spill-Response Plan

Discussion about oil-spill response plan is already included in Appendix A: (<http://www.boem.gov/Appendix-A-Deepwater-SEA-Oil-Spill-Discussion/>).

BSEE Spill-Response Program

Discussion about oil-spill response plan is already included in Appendix A: (<http://www.boem.gov/Appendix-A-Deepwater-SEA-Oil-Spill-Discussion/>).

Subsurface Response

Most oil-spill response strategies and equipment are based upon the simple principle that oil floats. However, as evident during the *Deepwater Horizon* spill, this is not always true. Sometimes oil suspends within the water column or sinks to the seafloor and sometimes it does all three: floats, suspends, and sinks. Oil suspended in the water column and moving with the currents is difficult to track using standard visual survey methods. Trajectory models traditionally used to predict floating oil movement and fate are not applicable to submerged oil - oil that is suspended in the water column and/or that sinks. There are no proven methods for the containment of submerged oil, and methods for recovery of submerged oil have limited effectiveness (Coastal Response Research Center, 2007).

Efforts to contain and/or recover suspended oil have focused on different types of nets, either the ad hoc use of fishing nets or specially designed trawl nets. There has been research conducted on the design of trawl nets for recovery of emulsified fuels. However, the overall effectiveness for large spills is expected to be very low. Suspended oil can occur as liquid droplets or semisolid masses in sizes ranging from millimeters to meters in diameter. At spills where oil has been suspended in the water column, responders have devised low technology methods for tracking the presence and spread of oil over space and time. For suspended oil, these methods include stationary systems such as snare sentinels, which can consist of any combination of the following: a single length of snare on a rope attached to a float and an anchor; one or more crab traps on the bottom that are stuffed with snare; and minnow or other type of traps that are stuffed with snare and deployed at various water depths. The configuration would depend upon the water depth where the oil is located within the water column. Currently, it is not possible to determine the particle size, number of particles, or percent oil cover in the water column based upon the visual observations of oil on these systems (Coastal Response Research Center, 2007).

Spills involving submerged oil trigger the need for real-time data on current profiles (surface to bottom), wave energy, suspended sediment concentrations, detailed bathymetry, seafloor sediment characteristics, and sediment transport patterns and rates. These data are needed to validate or calibrate models (both computer and conceptual), direct sampling efforts, and predict the behavior and fate of the submerged oil. This information might be obtained through the use of acoustic Doppler current profilers, dye tracer studies, rapid seafloor mapping systems, and underwater camera or video systems that could record episodic events (Coastal Response Research Center, 2007). During the *Deepwater Horizon* spill, Fluorometers were used successfully to detect the presence of oil.

Surface Response

Prior to the DeepSpill sea trials, there was some doubt about whether oil released subsea in deep water would reach the sea surface. The surface slick formed after the DeepSpill crude oil releases contained patches of water-in-oil emulsion with film thickness more than adequate for containment with oil booms

and also sufficient thickness for efficient treatment with chemical dispersant, similar to what actually happened during the *Deepwater Horizon* spill. However, the DeepSpill sea trials indicated that the potential lifetime of the crude oil slick would be short, which resulted in the report suggesting that the slick could be left to disperse naturally without attempting any mechanical cleanup (Johansen et al., 2001). The fact that the experiment did not involve the quantity of crude that was lost per day and on an ongoing basis for approximately 87 days as occurred during the *Deepwater Horizon* spill may account for the observed differences in slick behavior between the experiments and the GOM spill. As occurred during the Norwegian Sea trials, there was no hydrate formation at the damaged riser during the uncontrolled flow during the *Deepwater Horizon* spill.

The *Deepwater Horizon* spill incident indicated that, although released at a water depth of 5,000 ft (1,524 m), once the oil surfaced, a variety of response methods were effective on the oil that surfaced near the source. The options for oil combat in deep water are the same as those used for shallower waters (mechanical recovery, dispersion, in-situ burning). Response to the oil as it emulsified and moved farther from the source proved more difficult. The emulsified oil had to be chased down by the responders, making it more difficult for the skimmers to stay in skimmable oil. The emulsified oil was also less likely to be effectively burned or dispersed.

A variety of standard cleanup protocols were used for removing *Deepwater Horizon* spill oil from beaches, shorelines, and offshore water (Table 1). After the *Deepwater Horizon* spill, BSEE (then BOEMRE) issued NTL No. 2010-N10 that became effective on November 8, 2010. This NTL applies only to operators conducting operations using subsea blowout BOPs or surface BOPs on floating facilities. The NTL also informs lessees that BSEE will be evaluating whether each operator has submitted adequate information demonstrating that it has access to and can deploy surface and subsea containment resources that would be adequate to promptly respond to a blowout or other loss of well control. Although the NTL does not require that operators submit revised OSRP that include this containment information at this time, operators were notified of BSEE’s intention to evaluate the adequacy of each operator to comply in the operator’s current OSRP.

Source Control and Containment

The type of information that BSEE reviews pursuant to this NTL includes, but is not limited to:

- Subsea containment and capture equipment, including containment domes and capping stacks;
- Subsea utility equipment, including hydraulic power, hydrate control, and dispersant injection equipment;
- Riser systems;
- Remotely operated vehicles;
- Capture vessels;
- Support vessels; and
- Storage facilities.

Table A-1
Primary Cleanup Options Used during the *Deepwater Horizon* Spill Response.

Type	Fresh Oil	Sheens	Mousse	Tar Balls	Burn Residue
On-Water Response	Disperse, skim, burn	Light sheens very difficult to recover, heavier sheens picked up with sorbent boom or sorbent pads	Skim	Snare boom	Manual removal

On-Land Response	Sorbent pads, manual recovery, flushing with water, possible use of chemical shoreline cleaning agents	Light sheens very difficult to recover, heavier sheens picked up with sorbent boom or sorbent pads	Sorbent pads, manual recovery	Snare boom, manual removal, beach cleaning machinery	Manual removal
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Source: USDOC, NOAA, 2010.

To address the new improved containment systems expectations to rapidly contain a spill as a result of a loss of well control from a subsea well addressed in NTL No. 2010-N10, several oil and gas industry majors initiated the development of a new, rapid response system. This system is designed to fully contain oil flow in the event of a potential future underwater blowout and to address a variety of scenarios. The system would consist of specially designed equipment constructed, tested, and available for rapid response. It is envisioned that this system could be fully operational within days to weeks after a spill event occurs. The system is designed to operate in up to 10,000 ft (3,048 m) water depth and will add containment capability of 100,000 BOPD (4.2 million gallons per day). The companies that originated this system have formed a non-profit organization, the Marine Well Containment Company (MWCC), to operate and maintain the system. MWCC will provide fully trained crews to operate the system, will ensure the equipment is operational and ready for rapid response and will conduct research on new containment technologies. This system will connect by risers to vessels that are designed to safely capture, store and offload the oil. This improves safety and environmental protection by fully securing the well via capping and shut-in or by containing the oil flow until the well is under control. It also enhances safe operations by reducing congestion (i.e., fewer vessels, risers/flowlines). Until this equipment is available, MWCC has built a subsea containment equipment system that is engineered to be used in water depths up to 8,000 ft (2,438 m) and has the capacity to contain 60,000 BOPD. This initial response system includes a capping stack with the ability to shut in oil flow or to flow the oil via flexible pipes and risers to surface vessels.

Another option for source control and containment is through the use of the equipment stockpiled by Helix Energy Solutions Group, Inc. (Helix). The Helix initiative involves more than 20 smaller energy companies, and supplements the MWCC response effort. Helix has stockpiled the equipment that it found useful in the *Deepwater Horizon* response and is offering it to oil and gas producers for immediate use. The Helix system centers on three ships: the *Helix Producer I*; the *Q4000*; and the *Express* deepwater construction vessel. These vessels played a role in the *Deepwater Horizon* response and continue to work in the Gulf. Together, the Helix ships and related equipment can handle up to 55,000 BOPD, 70,000 bbl of liquid natural gas and 95 million cubic feet of natural gas at depths up to 8,000 ft (2,439 m). The primary difference between the MWCC system and the Helix system is that nothing needs to be built for the Helix system it has been field tested, and is currently available for deployment. Another group, Wild Well Control, is also providing some subsea containment capability and debris removal to offshore operators.

BOEM and BSEE will not allow an operator to begin drilling operations until adequate subsea containment and collection equipment as well as subsea dispersant capability is determined by the agency to be available to the operator and sufficient for use in response to a potential incident from the proposed well(s). However, it would be impossible to predict with any degree of certainty the percentage of oil that could be contained subsea in the event of a spill or when or if complete containment would even be possible. There are some situations where this equipment might not be able to be used to control the well, for example, if the drilling structure were to fall directly on top of the well as debris during a loss of well control event. If a loss of well control event occurred in the future, it is possible that it could be contained in a best case scenario within weeks with the utilization of the rapid subsea containment packages thereby greatly limiting the amount of oil potentially lost to the environment.

Summary

In the event of a spill, particularly a blowout, there is no single method of containing and removing it that would be 100 percent effective. Removal and containment efforts to respond to an ongoing spill would likely require multiple technologies, including mechanical cleanup, burning of the slick, and chemical dispersants. Even with the deployment of all of these technologies, it is likely that, with the operating limitations of today's spill response technology, not all of the oil could be contained and removed offshore.

It is likely that larger spills in deep waters under the right conditions would require the simultaneous use of all available cleanup methods (mechanical cleanup, dispersant application, and in-situ burning. That being said, when one considers the historical/statistical data, the recent subsea containment improvements, BOEM's and BSEE's enhanced oversight, and industry's heightened safety awareness since the *Deepwater Horizon* spill, it is reasonable to conclude that an accidental spill event is not likely to occur.

2. ALTERNATIVES CONSIDERED

2.1. NO ACTION ALTERNATIVE

Alternative 1 – If selected, the operator would not undertake the proposed activities. If the proposed activities are not undertaken, all environmental impacts, including additional routine, accidental, or cumulative impacts to the environmental and cultural resources described in the Multisale EIS and 2018 SEIS and this SEA would not occur.

2.2. THE PROPOSED ACTION AS SUBMITTED

Alternative 2 – If selected, the operator would undertake the proposed activities as requested and conditioned in their plan. This alternative assumes that the operator will conduct their operations in accordance with their lease stipulations, the OCSLA and all applicable regulations (as per 30 CFR § 550.101(a)), and guidance provided in all appropriate NTLs (as per 30 CFR § 550.103). However, no additional, site-specific condition(s) of approval would be required by BOEM.

2.3. APPROVAL OF THE PROPOSED ACTION WITH EXISTING AND/OR ADDITIONAL CONDITION(S) OF APPROVAL

Alternative 3 – This is BOEM's *Preferred Alternative*. If selected, the operator would undertake the proposed activities as requested in the plan and conditioned by stipulations, regulations, and guidance (similar to alternative 2); however, BOEM would require the operator to undertake additional condition of approval as identified in Chapter 2.4 below and described in the effects analyses in order to fully address the potential site- and project-specific impacts of the proposed action. Alternative 3 is the preferred alternative.

2.4. SUMMARY AND COMPARISON OF THE ALTERNATIVES

If selected, Alternative 1, the no action alternative, would prevent the operator from exercising its rights under the lease and conducting their proposed activities. Alternative 1 would not result in any impacts to the environmental resources analyzed in Chapter 3; however, it does not allow the lessee to develop the oil and gas resources of its lease for the benefit of the U.S. economy. Alternative 2 would result in the lessee achieving its objectives; however, BOEM has determined that additional condition(s) of approval (described below) is needed to limit or negate possible environmental impacts. Alternative 2 does not include the additional condition(s) of approval.

Alternative 3 is the preferred alternative because it allows the lessee to achieve its exploration objectives and also provides for additional condition of approval requirements to limit or negate potential environmental impacts.

Condition(s) of Approval Required under the Preferred Alternative

The need for, and utility of, the following condition of approval is discussed in the relevant impact analysis section of this SEA. To ensure adequate environmental protection, the following condition of approval is applied:

NON-RECURRING BENTHIC MITIGATION: There is an area capable of supporting high-density deepwater benthic communities within 2,000 ft of your proposed Well E (3). The well is 1,814 feet from the community, which in this case provides adequate protection from muds and cuttings during operations. The actual wellsite shall not be placed closer than 1500 feet from the habitat (see attached map which depicts the area and the well under separate cover). Provide a map showing the final as-placed Well Site E, the habitat, and distance of Well Site E from the potential habitat, to the BOEM Regional Supervisor, Office

of Leasing and Plans, Plans Section (MS GM1053C) at the same time you submit your End of Operations Report (Form BSEE-0125) to the appropriate BSEE GOMR District Office to demonstrate that the feature(s) were not physically impacted by the drilling activity.

2.5. ALTERNATIVES CONSIDERED BUT NOT ANALYZED

Several other alternatives were considered and reviewed during the preparation of this SEA and coordination of the resource reviews. Ultimately, a viable alternative is required to be a logical option for carrying out the proposed action, ensure that the purpose of and need can be met, and be feasible under the regulatory directives of the OCSLA and all other applicable guidance. The table below lists the alternatives that were considered but dismissed and not analyzed further along with the rationale for the decision:

Alternatives Considered but Not Analyzed.

Dismissed Alternative	Alternative Detail	Reason Not Analyzed
Daytime Drilling Only	The alternative would restrict all drilling operations to the hours between legal sunrise and sunset to take advantage of the increased lighting in an effort to improve safety.	This alternative does not consider adequate lighting, existing safety protocol, and that the premature stopping of some drilling/well operations prior to critical junctures could lead to highly-problematic and unsafe situations.
Drilling from an Anchored MODU Only.	The alternative would only allow drilling activities from an anchored MODU to reduce air quality impacts from the increased emissions released from DP MODUs.	This alternative does not consider the limited availability of conventionally-moored MODUs in the GOM or the negligible air quality concerns for temporary operations taking place a great distance from shore.
Incorporation of "Seasonal" Drilling Windows	The alternative would be based upon "seasonal" migrations or behavioral patterns exhibited by protected species and would restrict the proposed drilling operations for several weeks/months each year.	This alternative would have to rely upon incomplete seasonal data and it would not be able to account for year-round equipment and personnel contracting.

3. DESCRIPTION OF THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

3.1. INTRODUCTION

The discussion below will: (1) briefly describe/summarize the pertinent affected resources; (2) discuss whether the proposed activities and their IPFs would have significant impacts to the human environment of the GOM; and (3) identify significant impacts, if any, that would require further NEPA analysis in an EIS. The description of the affected environment and impact analysis are presented together in this section for each resource. For the impact analysis, resource-specific significance criteria were developed for each category of the affected environment. The criteria reflect consideration of both the context and intensity of the impact at issue (see 40 CFR § 1508.27). For the sake of this document, the criteria for impacts to environmental resources are classified into one of the three following levels:

- Significant Impact (including those that could be mitigated to non-significance);
- Adverse but Not Significant Impact; or
- Negligible Impact.

Preliminary screening for this assessment was based on a review of this relevant literature; previous SEAs; the Multisale EIS and 2018 SEIS; and statistics/data pertinent to historic and projected activities. BOEM initially considered the following resources for impact analysis:

- marine mammals (including Endangered Species Act (ESA) listed species and strategic stocks);
- sea turtles (all are ESA listed species);
- fishes (including listed species and ichthyoplankton);
- commercial and recreational fisheries;
- coastal and marine birds (including ESA listed species);

- benthic communities (including deepwater benthic communities, live bottoms, and topographic features, and potentially sensitive biological features (PSBF));
- archaeological resources;
- military uses;
- recreational and commercial diving;
- socioeconomic conditions (including employment, marine transportation, and infrastructure)
- geology/sediments; and
- air and water quality.

The impact analyses focus on a broad group of oil and gas activities and resources with the potential for non-negligible impacts. Routine, accidental, and cumulative impacts from exploration activities similar to those proposed by Kosmos are analyzed in the Multisale EIS and 2018 SEIS that considered the proposed activities as well as impacts to resources relevant to the proposal. The level of impacts associated with each interaction was analyzed and described in the EIS and is incorporated by reference.

The Multisale EIS and 2018 SEIS provides a comprehensive characterization of biological and socioeconomic resources that may be adversely affected by oil and gas exploration and development activities. For this SEA, BOEM evaluated the potential impacts resulting from the operator's proposed activities that were not considered in the Multisale EIS and 2018 SEIS. This section concentrates on the potential impacts of the proposed action on the following affected resources:

- air quality,
- offshore water quality,
- deepwater benthic biologically sensitive resources,
- marine mammals (including Threatened/Endangered and Nonendangered Species),
- sea turtles (all are ESA listed species),
- fisheries and essential fish habitat (EFH), and
- archaeological resources.

Other environmental and socioeconomic conditions, identified in the initial list of resources considered for impact analysis above, such as military uses, were considered and the potential impacts that could occur from activities, such as the proposed activities, were fully addressed in the Multisale EIS and 2018 SEIS and deemed negligible (40 CFR § 1508.27) and are not discussed in this SEA. Space-use conflicts with recreational and commercial fishing vessels will be negligible compared to the area available for these activities, and there is a potential for an increase in some types of fishing activity due to development. There are no known recreational and/or commercial diving operations regularly occurring in the area. Although development could necessitate a negligible increase in commercial dive activity, potential impact levels do not warrant further analysis. Coastal and marine birds were not further analyzed due to the distance from shore as well as the temporary nature of the proposed activities. Topographic and pinnacle features were not further analyzed due to the distance from the proposed activities to the nearest topographic and pinnacle features (~48 mi (~77 km) and ~71 mi (~114 km) respectively). No socioeconomic effects were further analyzed due to the type, the temporary nature, and employment size, of the proposed activity. There is no expansion or modification of support bases proposed as a result of this activity. Additionally, support vessel operations are comparable to that described and analyzed in the Multisale EIS and 2018 SEIS for similar activities. The potential impacts of a low-probability, Catastrophic Oil-Spill event, such as the *Deepwater Horizon* spill to the environmental resources and socioeconomic conditions listed above are fully addressed in the Catastrophic Spill Event Analysis (Appendix B of the 2012-2017 WPA/CPA Multisale EIS (USDOJ, BOEM, 2012)). This analysis was later updated and published as a "Catastrophic Spill Event Analysis" white paper (USDOJ, BOEM, 2017c) and a respective resource summary of that analysis is provided in each impact review below.

Deepwater Horizon Impacts Incorporated into SEA Analyses

BOEM, in conjunction with the well operator and other Federal and State agencies, continues to monitor and evaluate both the short-term and long-term impacts of the accidental spill. There is ongoing research to assess the impacts to resources from the *Deepwater Horizon* blowout, spill, and response efforts. For many resources, the data are still being collected and analyzed through the National Resource Damage Assessment (NRDA) process. BOEM continues to seek data and research results from the NRDA process

and the scientific community. Results of this research are forthcoming, and BOEM subject matter experts (SMEs) are continuing to update their analyses as this information becomes available.

Chapter 3 of this document describes the environmental and archaeological resources and the potential routine, accidental, and cumulative impacts of the proposed action on the resources that could be affected by the proposed activities. These descriptions present environmental resources as they are now, thus providing new baseline information that is informed by the *Deepwater Horizon* spill for analyses of potential impacts from the proposed activities.

3.2. AIR QUALITY

3.2.1. Affected Environment

The complete description of the air quality in the GOM region is set forth in Chapter 4.1 of the Multisale EIS and 2018 SEIS and is incorporated by reference. The following information is a summary of the description incorporated from the Multisale EIS and 2018 SEIS. Mississippi Canyon Block 727 is located west of 87.5° W. longitude and hence, falls under BOEM jurisdiction for enforcement of the Clean Air Act (CAA). The air over the OCS water is not classified, but some criteria pollutants may exceed the National Ambient Air Quality Standards (NAAQS) (USDOJ, BOEM, 2017). The proposed exploration activities are located approximately 54 mi (87 km) from the nearest coastline of Plaquemines Parish, Louisiana. The Houston/Galveston, Texas area is in nonattainment for the 2008 ozone 8-hour standard. As of October 1, 2015, the U.S. EPA strengthened NAAQS for ozone and will release new designated areas in late 2017. Two new 1-hour NAAQS standards went into effect in 2010. They are the 1-hour NO₂ standard of 100 ppb and the 1-hour SO₂ standard of 75 ppb. The St. Bernard Parish, Louisiana is in nonattainment for the 2010 1-hr sulfur dioxide (SO₂) standard. Other than these areas, the coastal areas are in attainment of the NAAQS for ozone, carbon monoxide, nitrogen oxides, sulphur oxides, and particulate matter. For Prevention of Significant Deterioration (PSD) purposes, the coastal areas are classified as a Class II Areas.

Influences to onshore air quality are dependent upon meteorological conditions and air pollution emitted from operational activities. The pertinent meteorological conditions regarding air quality are the wind speed and direction, the atmospheric stability, and the mixing height (which govern the dispersion and transport of emissions). The typical, large-scale wind flow for the GOM area is driven by the clockwise circulation around the Bermuda High, resulting in a prevailing southeasterly to southerly wind flow, which is conducive to transporting air pollution emissions toward shore. However, superimposed upon this large-scale circulation are smaller scale wind-flow patterns, such as the land/sea breeze phenomenon. In addition, there are other large-scale weather features that occur periodically, namely tropical cyclones, and mid-latitude frontal systems. Because of the routine occurrence of these various conditions, the winds blow from all directions in the area of concern (MacDonald et al., 2004)).

3.2.2. Impact Analysis

A detailed impact analysis of the routine, accidental, and cumulative impacts of the proposed activities on air quality can be found in Chapter 4.1 of the Multisale EIS and 2018 SEIS and is incorporated by reference. The following information is a summary of the impact analyses.

3.2.2.1. Alternative 1

If selected, Alternative 1, the no action alternative, would result in the operator not undertaking the proposed activities as described in the plan. Therefore, the IPFs to air quality would not occur. For example, there would be no VOC emissions that would result in potential localized degradation of air quality.

3.2.2.2. Alternative 2

If selected, Alternative 2, the proposed action would result in the operator undertaking the proposed activities, as requested and conditioned in the plan. As described in the analyses below, impacts to air quality from the proposed action are expected to be short-term, localized and will not lead to significant impacts.

Routine Activities

Air quality would be affected in the immediate vicinity of the proposed activities, service vessels, and aircraft. The impact from emissions for the proposed activities described in this supplemental EP will not exceed BOEM's exemption levels per 30 CFR § 550.303(d), which would exempt the operator from additional air quality modeling. The proposed activities are not expected to significantly affect onshore air quality due to the distance from shore and the distance from the area of the proposed action to any PSD Class I air quality area such as the Breton National Wildlife Refuge.

Accidental Events

Should a spill of oil occur, the volatile organic compounds (VOCs), which would escape to the atmosphere from a surface slick, are precursors to photochemically produced ozone. A spike in VOCs could contribute to a corresponding spike in ozone, especially if the release were to occur on a hot sunny day in a NO₂-rich environment. Should an accidental or emergency flaring or venting of gas occur, VOCs, methane, and carbon monoxide would also escape to the atmosphere. VOCs and nitrogen oxides can contribute to ozone formation in the presence of sunlight. (Additionally, flared and vented gas can contain hydrogen sulfide which could result in emitted SO₂.) With the exception of Houston/Galveston, Texas area, the corresponding onshore area is in attainment for ozone. Additionally, with the exception of the St. Bernard Parish, Louisiana, the corresponding onshore area is in attainment for SO₂. Due to the distance from shore, the proposed activities are not expected to have any impacts to onshore air quality, including nonattainment areas. If a fire occurs, prior to containment, particulate and combustible emissions will be released in addition to the VOCs. Emissions of pollutants into the atmosphere from routine activities associated with the proposed activities are expected to have minimal impacts to onshore air quality because of the prevailing atmospheric conditions, emission heights, emission rates, and the distance of these emissions from onshore.

Despite the recent *Deepwater Horizon* spill, historical trends in the GOM (see **Chapter 1.4** and the "Catastrophic Spill Event Analysis" white paper) indicate that catastrophic spill events are not likely to occur as a result of the activities associated with the proposed action. In the event of a catastrophic spill similar to the *Deepwater Horizon* spill, the "Catastrophic Spill Event Analysis" white paper (USDOJ, BOEM, 2017c) discusses the most likely and most significant impacts to air quality as it relates to the four phases of a major spill/blowout

- 1) **Initial Event** (Section 2.2.1.1.; Page B-4);
- 2) **Offshore Spill** (Section 3.2.1.1; Page B-15);
- 3) **Onshore Contact** (Section 4.2.1.1; Page B-30); and
- 4) **Post-Spill, Long-Term Recovery** (Section 5.2.1.1.; Page B-40).

As the Catastrophic Spill Analysis in "Catastrophic Spill Event Analysis" white paper (USDOJ, BOEM, 2017c) concludes, the potential impacts from a catastrophic spill could include air quality impacts that would require extensive recovery times.

Cumulative Impacts

Cumulative impacts on air quality within the offshore area would come primarily from non-OCS oil/gas activities in the Gulf as well as sources on land such as generated outside the OCS and include emissions from industrial plants, power generation, and urban transportation. The location of the proposed action is far removed from coastal populations or industrial activity. The proposed activities are located over 54 mi (87 km) from the nearest shoreline, and would not affect the overall quality of air over the coast because of the distance to shore. Figure 4-1 of the Multisale EIS and 2018 SEIS (USDOJ, BOEM, 2017a and b) shows the Texas and Louisiana ozone attainment status (USEPA, 2015). Except for Southeast Texas (Houston-Galveston-Brazoria), which is in nonattainment for ozone, and St. Bernard Parish, Louisiana, which is in nonattainment for SO₂, the Gulf's coastal areas are currently designated as "attainment" for all of the NAAQS regulated pollutants. Minor to moderate cumulative impacts on air quality are expected as a result of the proposed activities when added to the impacts of past, present, or reasonably foreseeable oil and gas development in the area, as well as other activities in the area, though the incremental impacts from the proposed activities are expected to be minor.

Conclusion

The air quality in the immediate vicinity of the proposed activities would be affected by the projected emissions, but the 54 mi (87 km) distance between the area of the proposed action and the nearest shoreline results in substantial dilution factors for point-source emissions from the proposed action so that onshore air quality impacts would be well below levels considered to be significant.

3.2.2.3. *Alternative 3*

If selected, Alternative 3, the proposed action with additional condition(s) of approval, would allow the operator to undertake the proposed activities, as requested and conditioned in the plan; however, the operator would be required to undertake additional condition(s) of approval as identified by BOEM. As described in the analyses above for alternatives 1 and 2, impacts to air quality from the proposed action are expected to be localized and will not lead to significant impacts. The condition of approval outlined in Chapter 2.4 is not expected to increase or decrease the potential for effects to air quality from the proposed action. Alternative 3 does not differ from Alternative 2 because the additional condition of approval does not address this resource (i.e., all assumptions, estimates, and conclusions are identical), see the analysis provided in Chapter 3.2 for this alternative for this resource.

3.3. OFFSHORE WATER QUALITY

3.3.1. Affected Environment

The description of water quality in offshore waters of the GOM is set forth in Chapter 4.2 of the Multisale EIS and 2018 SEIS and is incorporated by reference. The following information is a summary of the description incorporated from the Multisale EIS and 2018 SEIS.

The GOM is the ninth largest waterbody in the world. The Mississippi River Basin drains 41 percent of the contiguous United States. The basin covers more than 1,245,000 square miles, and includes all or parts of 31 states and two Canadian provinces (USACE, 2015).

The physical oceanography of the deep Gulf can be approximated as a two-layer system with an upper layer about 800- to 1,000-m (2,625- to 3,281-ft) deep that is dominated by the Loop Current and associated clockwise (anticyclonic) eddies (Welsh et al., 2009; Inoue et al., 2008); and the lower layer below ~1,000 m (3,281 ft) that has near uniform currents (Welsh et al., 2009; Inoue et al., 2008).

Deep waters east of the Mississippi River are affected by the Loop Current and associated warm-core anticyclonic eddies, which consist of clear, low-nutrient water (Muller-Karger et al., 2001). Cold-core cyclonic eddies also form at the edge of the Loop Current and are associated with upwelling and nutrient-rich, high-productivity waters. More details on the physical oceanography of the GOM are available in Chapter 3.3 of the Multisale EIS and 2018 SEIS.

Typical water quality parameters that are considered important to the health of coastal and marine environments include temperature, salinity, dissolved oxygen, nutrients, pH, turbidity, and pollutants.

Surface water temperatures in the GOM vary seasonally from about 29 °C (84 °F) in the summer to about 19 °C (65 °F) in the winter (Gore, 1992). In the summer, warm water may be found from the surface down to a thermocline at depths to about 160 ft (50 m) deep. Minimum water temperatures at the deep seafloor approach 4° C (39 °F).

The salinity at the sea surface in the offshore central GOM is generally 36 parts per thousand (ppt) (Gore, 1992). Lower salinities are characteristic nearshore where fresh water from the rivers mix with shallow Gulf waters. For example, salinity in open water near the coast may vary between 29 and 32 ppt during fall and winter, but it may decline to 20 ppt during spring and summer due to increased runoff (USDOI, MMS, 2000).

Dissolved oxygen (DO) concentrations in seawater vary as a function of temperature and barometric pressure. In general, cold water supports higher DO concentrations than warm water. DO concentrations between 5 and 10 milligrams per liter (mg/L) are considered beneficial to aquatic life. The GOM hypoxic zone is a band of oxygen-stratified water that stretches along the Texas-Louisiana shelf each summer where the DO concentrations are less than 2 mg/L. It is the largest hypoxic area in the entire western Atlantic Ocean (Turner et al., 2005). The hypoxic zone is the result of excess nutrients, primarily nitrogen, carried downstream by rivers to discharge to coastal waters. Density stratification results where the less dense, nutrient-rich fresh water spreads on top of the denser seawater and prevents oxygen from replenishing the

bottom waters. The excess nutrients cause phytoplankton blooms which eventually die and sink to the bottom, where bacterial decomposition consumes DO.

Seawater generally averages pH 8 at the surface due to marine systems being buffered by carbonates and bicarbonates. However, in the open waters of the GOM, pH ranges from approximately 8.1 to 8.3 at the surface (Gore, 1992). The pH decreases to approximately 7.9 at a depth of 700 m (2,297 ft), and in deeper waters, it increases again to approximately 8.0 (Gore, 1992).

Gulf of Mexico coastal waters offshore of Texas, Louisiana, Mississippi, and Alabama exhibit high turbidity due to suspended sediment in river discharge, especially during seasonal periods of heavy precipitation. High turbidity may extend up to 50 miles offshore the Mississippi River and lesser distances to the east and west along the coast. Storms may also resuspend soft bottom sediments on the continental shelf, causing an increase in turbidity near the seafloor. Stratified water normally restricts this turbid water to within 20 m (66 ft) from the seafloor up into the water column (Bright et al., 1976; Bright and Rezak, 1978). Warm-core eddies can entrain and transport high turbidity shelf waters to farther offshore over deep Gulf waters. Outside of these areas, water clarity in the GOM is good to excellent, with low levels of suspended sediment.

River runoff may include pollutants such as nutrients, pesticides and other organic chemicals, and metals. The Mississippi River introduces approximately 3,680,938 bbl of oil and grease per year from land-based sources (NRC, 2003) into the waters of the GOM. Offshore waters, especially deeper waters, are more directly affected by natural seeps. Hydrocarbons enter the GOM through natural seeps at a rate of approximately 980,392 bbl per year (a range of approximately 560,224-1,400,560 bbl per year) (NRC, 2003).

The National Research Council estimated that, on average, approximately 26,324 bbl of oil per year entered Gulf waters from petrochemical and oil refinery industries in Louisiana and Texas. Spills to coastal waters include pipeline releases (annual estimate of 6,230 bbl), tank vessel incidents (5,390 bbl), and coastal facility releases (5,180 bbl); while spills to offshore waters include pipeline releases (annual estimate of 420 bbl) and tank vessel incidents (10,500 bbl) (NRC, 2003).

The April 2010 *Deepwater Horizon* oil spill resulted from failures of a cement well seal and subsea blowout preventer. The Government estimated that approximately 4.9 million barrels of oil were released during the event (Oil Spill Commission, 2011a), and that 1.84 million gallons of dispersant were used subsea at the wellhead and on the surface (Oil Spill Commission, 2011b). Additionally, the corresponding emission of methane from the wellhead during the event was estimated between 9.14×10^9 and 1.25×10^{10} moles (Kessler et al., 2011). Short-term and long-term effects from the *Deepwater Horizon* oil spill are discussed in "Catastrophic Spill Event Analysis" white paper (USDOJ, BOEM, 2017c).

3.3.2. Impact Analysis

A detailed impact analysis of the routine, accidental, and cumulative impacts of the proposed activities on offshore water quality can be found in Chapter 4.2 of the Multisale EIS and 2018 SEIS, and is incorporated by reference. The IPFs associated with the proposed activities in Mississippi Canyon Block 727 that could affect marine water quality include: (1) turbidity from bottom disturbances from well emplacement activities; (2) drilling discharges, including cuttings with associated drilling muds; and (3) accidental spills of crude oil, diesel fuel, chemicals, or other materials from vessels/blowouts in marine waters. As explained below, due to the type and the temporary nature of the proposed activities, no substantive impacts would be expected.

3.3.2.1. Alternative 1

If selected, Alternative 1, the no action alternative, would result in the operator not undertaking the proposed activities as described in the plan. Therefore, the IPFs to offshore water quality would not occur. There would be no turbidity issues related to well emplacement activities that would result in potential localized degradation of water quality, no discharges during the drilling of the well and no accidental spills of crude oil, diesel fuel, chemicals, or other materials from vessels/blowouts in marine waters.

3.3.2.2. Alternative 2

If selected, Alternative 2, the proposed action, would result in the operator undertaking the proposed activities as requested and conditioned in the plan. As described in the analyses below, impacts to water

quality from the proposed action, as submitted by the operator, are expected to be short-term, localized and not lead to significant impacts.

Routine Operations

Impacts to water quality from routine activities associated with drilling or production may include overboard discharges of fluids and cuttings during drilling, development and workovers of exploration and production wells; and service-vessel discharges.

The primary operational waste streams generated during offshore oil and gas exploration, development and production are drilling fluids, drill cuttings, various waters (e.g., bilge, ballast, fire, and cooling), deck drainage, sanitary wastes, domestic wastes, produced water, produced sand, and well treatment, workover, and completion fluids. Minor additional waste streams include desalination unit discharges, blowout preventer fluids, boiler blowdown discharges, excess cement slurry, several fluids used in subsea production, and uncontaminated freshwater and saltwater.

The U.S. Environmental Protection Agency (USEPA) (Regions 4 and 6) regulates all waste streams generated from offshore oil and gas activities. Section 403 of the Clean Water Act (CWA) requires that National Pollutant Discharge Elimination System (NPDES) permits be issued for discharges to the territorial seas (baseline to 3 mi [5 km]), the contiguous zone, and the ocean in compliance with USEPA's regulations for preventing unreasonable degradation of the receiving waters. Water Quality Standards consist of the waterbody's designated uses, water quality criteria to protect those uses and to determine if they are being attained, and antidegradation policies to help protect high-quality waterbodies. Discharges from offshore activities near State water boundaries must comply with all applicable State Water Quality Standards. In general, waste streams that can be discharged overboard include water-based drilling fluids and drill cuttings, synthetic-based fluid-wetted drill cuttings, cement slurries, various treated waters and sanitary wastes, and uncontaminated freshwater and saltwater provided they meet the criteria of the applicable NPDES permit. Drill cuttings and cement slurries are generally shunted to close proximity to the seafloor to minimize turbidity.

Discharged water may not cause a sheen on the water surface, and the oil/grease concentration may not exceed 42 mg/L daily maximum, or 29 mg/L monthly average. The discharge must also be characterized for toxicity. The NPDES permits require no discharge within 1,000 m (3,281 ft) of an area of biological concern. Region 4 also requires no discharge within 1,000 m (3,281 ft) of any federally designated dredged material ocean disposal site.

Impacts to offshore waters from routine activities associated with the subject plan should be minimal. A detailed impact analysis of the routine impacts to offshore waters due to OCS activities can be found in Chapter 4.2 of the Multisale EIS and 2018 SEIS.

Accidental Events

Accidental events associated with the subject plan that could impact offshore water quality include spills of oil and refined hydrocarbons, releases of natural gas and condensate, spills of chemicals or drilling fluids, loss of well control, pipeline failures, collisions, or other malfunctions that would result in such spills. Spills from collisions are not expected to be significant. Overall, since major losses of well control and blowouts are rare events, potential impacts to offshore water quality are not expected to be significant except in the rare case of a catastrophic event. Although response efforts may decrease the amount of oil in the environment, the response efforts may also impact the environment through, for example, increased vessel traffic and the application of dispersants. Natural degradation processes will also decrease the amount of residual oil over time. Chemicals used in the oil and gas industry are not a significant risk to water quality because they are either nontoxic, are used in minor quantities, or are only used on a noncontinuous basis. A detailed impact analysis of the accidental impacts that may be associated with the proposed action on offshore waters can be found in Chapter 4.2 of the Multisale EIS and 2018 SEIS. Accidental spills as a result of a catastrophic event are discussed in "Catastrophic Spill Event Analysis" white paper (USDOJ, BOEM, 2017c).

In the event of a catastrophic spill similar to the *Deepwater Horizon* spill, the "Catastrophic Spill Event Analysis" white paper (USDOJ, BOEM, 2017c) discusses the most likely and most significant impacts to offshore water quality as it relates to three of the four phases of a major spill/blowout:

- 1) **Initial Event** (Section 2.2.1.2.; Page B-5);
- 2) **Offshore Spill** (Section 3.2.1.2; Page B-16);

- 3) **Onshore Contact** (offshore water quality not included in this discussion); and
- 4) **Post-Spill, Long-Term Recovery** (Section 5.2.1.2.; Page B-40).

The potential impacts from a catastrophic spill could result in both temporary and long term offshore water quality degradation that would require extensive recovery times. However, despite the recent *Deepwater Horizon* spill, historical trends in the GOM (see **Chapter 1.4** and the “Catastrophic Spill Event Analysis” white paper) indicate that catastrophic spill events are not likely to occur as a result of the proposed action.

Cumulative Impacts

Exploration, development, and production activities contribute to cumulative water quality degradation in offshore waters. Surface spills of oil, diesel fuel, and other materials may occur from vessels transporting crude oil and petroleum products; from vessels involved in commercial fishing, freight or passenger transport; and from OCS operations. Such spills are low volume and are readily dispersed on the water surface. Well blowouts can disturb the bottom, increase turbidity, and put hydrocarbons into the sea. Should an oil spill $\geq 1,000$ bbl (but not catastrophic) occur, localized, short-term changes in water quality would be expected, however, cumulative impacts on water quality over the long term would be negligible.

Therefore, no significant cumulative impacts on offshore water quality would be expected as a result of the proposed activities when added to the impacts of past, present, or reasonably foreseeable oil and gas development; as well as other activities in the area.

Conclusion

Impacts on offshore water quality from the operational discharges that would be expected to result from the proposed action are negligible because of: 1) existing USEPA regulations; 2) water depth; 3) distance of the project from the coast; 4) weathering; and 5) dilution factors. Spilled oil originating from the project is not expected to be $\geq 1,000$ bbl and is expected to be substantially recovered/weathered while still at sea. Operator-initiated activities to contain and clean up an oil spill would begin as soon as possible after an event. Small quantities of unrecovered oil would weather and largely biodegrade within two weeks.

No significant long-term impacts on offshore water quality would be expected from the subject plan because of the type of and temporary nature of the proposed activity. Near-bottom water quality would be affected by increased turbidity and disturbed substrates during the period of well emplacement. Any effects from the elevated turbidity would be short term, localized, and reversible.

3.3.2.3. Alternative 3

If selected, Alternative 3, the proposed action with additional condition(s) of approval, would allow the operator undertaking the proposed activities, as requested and conditioned in the plan; however, the operator would be required to undertake additional condition(s) of approval as identified by BOEM. As described in the analyses above, impacts to offshore water quality from the proposed action are expected to be short-term, localized and not lead to significant impacts. The conditions of approval outlined in **Chapter 2.4** and discussed in the other resource sections are not expected to increase or decrease the potential for effects to offshore water quality from the proposed action. Alternative 3 does not differ from Alternative 2 because the additional conditions of approval does not address this resource (i.e., all assumptions, estimates, and conclusions are identical), see the analysis provided in **Chapter 3.3** for this alternative for this resource.

3.4. DEEPWATER BENTHIC COMMUNITIES

For purposes of OCS activity impact analyses, BOEM defines “deepwater benthic communities,” to include chemosynthetic and deepwater coral communities in the GOM as those typically found in water depths of 984 ft (300 m) and greater (USDOJ, BOEM, 2017a and b). Chemosynthetic communities are formed around natural seepages where bacteria consume methanes and sulfides and chemosynthetically derive amino acids and sugars for respiration. Bacteria then excrete carbon dioxide that may result in calcium carbonate precipitating from the water column. Eventually, enough precipitate can form a hard substrate where higher order chemosynthetic organisms can colonize the surfaces to create a complex, three-dimensional matrix that can be further colonized. Deepwater coral communities can co-occur on hard substrates near hydrocarbon seeps with chemosynthetic organisms; however, they also routinely colonize

natural or artificial hard substrates without any hydrocarbon seepage. In addition to deepwater corals, other associated deepwater fauna include sponges, anemones, echinoderms, crustaceans, and fishes.

3.4.1. Affected Environment

A description of chemosynthetic deepwater benthic communities in the GOM region can be found in Chapter 4.4 of the Multisale EIS and 2018 SEIS. The following information is a summary of the descriptions in the EIS, and it is incorporated by reference into this SEA.

The continental slope in the GOM extends from the edge of the continental shelf at a depth of about 656 ft (200 m) to a water depth of approximately 9,840 ft (3,000 m) (USDOJ, BOEM, 2017a and b). The vast majority of the GOM has a soft, muddy bottom in which burrowing infauna are the most abundant invertebrates. Mississippi Canyon Block 727 falls into this category and the water depth of the proposed activity is greater than or equal to 4,817 ft (1,468 m).

A remarkable assemblage of invertebrates is found in association with hydrocarbon seeps in the GOM. Chemosynthetic communities can occur at or near hydrocarbon seeps and are defined as persistent, largely sessile assemblages of marine organisms dependent upon symbiotic chemosynthetic bacteria as their primary food source (MacDonald, 1992). Invertebrate taxa in these communities include tube worms and bivalves, among others. Symbiotic chemosynthetic bacteria live within specialized cells in the invertebrate organisms and are supplied with oxygen and chemosynthetic compounds (methane and sulfides) by the host via specialized blood chemistry (Fisher, 1990). Chemosynthetic bacteria, which live on mats, in sediment, and in symbiosis with chemosynthetic invertebrates, use a carbon source independent of photosynthesis to make sugars and amino acids. The host, in turn, lives off the organic products subsequently released by the chemosynthetic bacteria and may even feed on the bacteria themselves. Chemosynthetic communities can become established when a hard substrate is available for colonization at or near a seep. Depending on the situation, sessile benthic invertebrates can settle on and colonize carbonate substrate. These organisms form additional structure upon the seafloor, increasing the complexity of the habitat that may provide support to a variety of deepwater corals, other invertebrates and fishes.

Some deepwater corals form communities occurring at or near hydrocarbon seeps, or on exposed outcrops, and may be found in association with chemosynthetic communities. Deepwater coral communities are also found on shipwrecks, and deepwater oil and gas infrastructure. These coral communities are distinctive and provide three-dimensional habitat for a range of fishes and invertebrates. Hard-bottom habitats in deepwater include communities dominated by *Lophelia pertusa*, with other corals such as the bamboo coral (*Keratoisis flexibilis*) and zigzag coral (*Madrepora oculata*). Numerous other invertebrates are also associated with these benthic habitats (Sulak et al., 2008; Cordes et al., 2008; Fisher et al., 2007; Schroeder et al., 2005).

Hydrocarbon seep communities in the GOM have been reported to occur at water depths greater than 300 m (984 ft) (USDOJ, BOEM, 2017a and b). To date, there are over 300 documented deepwater benthic communities comprised of chemosynthetic organisms and/or deepwater corals. Once thought rare, research suggests that deepwater faunal communities are regularly associated with seafloor features commonly found in the vicinity of the primary geophysical signatures of the seabed for hydrocarbon migration to the seafloor. These areas include those where hydrocarbons percolate through sediments or where hydrocarbons move along faults that reach the seafloor. More than 23,000 positive anomalies have been identified from seismic survey data and each may represent a habitat where a hard substrate and a deepwater community may be found. However, until an anomaly has been visited and confirmed, it is unknown if hard substrates are exposed and capable of supporting deepwater benthic communities.

To map areas of probable habitat for deepwater benthic communities, scientists at BOEM analyzed decades of three-dimensional seismic data to classify seafloor returns exhibiting anomalously high or low reflectivity. The areas of high reflectivity represent patches of anomalous seafloor returns that likely indicate patches of hard seafloor that would provide substrate for deepwater benthic communities. Most confirmed hard bottoms in the deepwater GOM were created by the precipitation of calcium carbonate substrate by chemosynthetic bacterial activity and are capable of supporting deepwater benthic communities. However, non-biogenic hard bottoms are also found at escarpments, seafloor-reaching faults, or where salt formations reach the surface. Investigations of the seafloor at patches of high reflectivity indicate that chemosynthetic and coral communities are much more common in the deepwater GOM than previously known (USDOJ, BOEM, 2017a and b). Also, areas of low reflectivity (negative anomalies) can be indicative of gassy sediments and mud volcanoes with a high flux of hydrocarbons from the seafloor. Although uncommon, chemosynthetic bivalves may be found in areas with a high flux of hydrocarbons.

3.4.2. Impact Analysis

A detailed impact analysis of the routine, accidental, and cumulative impacts of the proposed activities on chemosynthetic and other deepwater sessile benthic communities can be found in Chapters 4.4 of the Multisale EIS and 2018 SEIS. The following information is a summary of the impact analyses in the Multisale EIS and 2018 SEIS and it is incorporated by reference into this EA.

Any hard substrate communities located in deep water would be particularly sensitive to impacts from OCS activities resulting in bottom disturbances and increased turbidity. Such impacts to these habitats could permanently prevent recolonization by similar organisms requiring hard substrate. The IPFs associated with the proposed activities in Mississippi Canyon Block 727 that could affect deepwater benthic communities include increased turbidity, burial, dislodgement, or direct impingement and crushing as a result of: (1) well emplacement; (2) drilling discharges, including cuttings and drilling muds; and (3) seafloor blowouts without an oil spill during well drilling or emplacement of subsea infrastructure. The maximum depth in this area is approximately 4,975 ft (1,516 m).

3.4.2.1. Alternative 1

If selected, Alternative 1, the no action alternative, would result in the operator not undertaking the proposed activities as described in the plan. Therefore, the IPFs to deepwater benthic communities would not occur. For example, there would be no well emplacement activities that could result in physical damage to the deepwater benthic communities or their substrates, no drilling discharges that could result in burial of the organisms, or no burial due to a blowout.

3.4.2.2. Alternative 2

If selected, Alternative 2, the proposed action, would result in the operator undertaking the proposed activities as requested and conditioned in the plan. Examples of potential impacts to possible deepwater benthic communities include, but are not limited to, damage from well emplacement activities, smothering from drilling discharges, possible sedimentation and/or oil contamination from a blowout, and crushing or burial from emplacement of subsea infrastructure. Because the operator is required to follow all existing lease stipulations as well as the applicable regulations as clarified by NTLs (the operator reaffirmed compliance in its plan as cited above), conditions outlined in the following analyses related to NTL No. 2009-G40 will result in reducing the probability of impacts to deepwater benthic communities.

3.4.2.3. Alternative 3

If selected, Alternative 3, the proposed action with additional condition(s) of approval, would allow the operator undertaking the proposed activities, as requested and conditioned in the plan; however, the operator would be required to undertake additional condition(s) of approval as identified by BOEM. Approval of the proposed plan would be conditioned on the operator conducting their well siting operations under the conditions of approval identified in Chapter 2.4 and discussed below. This condition of approval would limit/negate potential impacts and ensure that the resources identified in the site-specific deepwater benthic communities review will be protected.

Routine Activities

The analysis of the possible impacts from routine activities for Alternative 3 remains the same as that discussed for Alternative 2, above. As previously noted, a review of Kosmos' plan and associated survey data determined that sensitive deepwater benthic communities or sites that could support such communities are present within 2,000 ft (610 m) of plan's well site. Impacts to a sensitive deepwater benthic community could result from direct physical contact with well emplacement activities which could cause destruction of underlying carbonate structures. These impacts could be severe to the immediate area affected, with recovery times from decades to centuries, with the possibility of the community never recovering.

Compliance with the conditions of approval during well placement will allow operations to be conducted and potential impacts to be avoided to the maximum extent practicable. Ultimately, the implementation of the condition of approval reduces the potential for impacts from routine events of the proposed action by locating the associated activities away from resources.

Accidental Events

The analysis of the possible impacts from accidental events for Alternative 3 remains the same as that discussed for Alternative 2, above. Significant impacts to sensitive deepwater benthic communities are not expected from accidental blowouts without the presence of substantial quantities of oil due to the low probability of occurrence and the expected dilution given the distancing requirements.

Cumulative Analysis

The cumulative analysis for Alternative 3 remains the same as that discussed for Alternative 2, above. However, the imposition of the condition of approval outlined in **Chapter 2.4** will further ensure that the potential impacts of the proposed action on sensitive deepwater benthic communities and/or sites that could support them within the area of the proposed action will be low or non-existent, because activities will be sited away from the identified resource. Therefore, no significant cumulative impacts on sensitive deepwater benthic communities and/or sites that could support them would be expected.

Conclusion

The site-specific deepwater benthic communities review conducted for the proposed action determined that there were potential sensitive deepwater benthic communities or sites that could support such communities within 2,000 ft (610 m) of the well site; therefore impacts from drilling discharges, or blowouts are expected if conditions of approval are not implemented. The proposed activities have the potential to destroy any sessile benthic organisms that may be present or cause destruction of underlying carbonate structures. These impacts could be severe to the immediate area affected, with recovery times taking decades to centuries, if recovery occurs.

For this reason, Alternative 3 would require the lessee to comply with the conditions of approval outlined in **Chapter 2.4** during their activities. These conditions are designed to provide for appropriate distancing between the well locations and the identified resources to reduce or eliminate adverse impacts. Therefore, under Alternative 3, the proposed action is not expected to result in significant impacts on sensitive deepwater benthic communities or sites that could support such communities.

3.5. MARINE MAMMALS

3.5.1. Affected Environment

The U.S. Gulf of Mexico marine mammal community is diverse and distributed throughout the northern Gulf waters. Twenty-one species of cetaceans regularly occur in the GOM (Jefferson et al., 1992; Davis et al., 2000) and are identified in the NMFS GOM Stock Assessment Reports (Waring et al., 2016) in addition to one species of Sirenia. The GOM's marine mammals are represented by members of the taxonomic order Cetacea, which is divided into the suborders Mysticeti (i.e., baleen whales) and Odontoceti (i.e., toothed whales), as well as the order Sirenia which includes the manatee.

Threatened or Endangered Marine Mammal Species

There is only one cetacean, the sperm whale (*Physeter macrocephalus*), and one sirenian, the West Indian manatee (*Trichechus manatus latirostris*), that regularly occur in the GOM and that are listed as endangered under the Endangered Species Act (ESA). The sperm whale is common in oceanic waters of the northern GOM and appears to be a resident species. The West Indian manatee typically inhabits only coastal marine, brackish, and freshwater areas. The life history, population dynamics, status, distribution, behavior, and habitat use of baleen and toothed whales can be found in Chapter 4.9 of the Multisale EIS and 2018 SEIS, and is incorporated by reference, and also in the NMFS 2015 SAR (Waring et al., 2016). The distribution, feeding habits, habitat use, and population estimates of manatees can be found in Chapter 4.9 of the Multisale EIS and 2018 SEIS. On January 8, 2016 (81 FR 1000), the United States Fish and Wildlife Service (FWS) issued a proposed rule and notice to reclassify the West Indian manatee from endangered to threatened (*Federal Register*, 2016a) which was later issued as a Final Rule (82 FR 16668) on April 5, 2017 (USDOL, FWS, 2017). On December 8, 2016 (81 FR 88639), NMFS issued a proposed rule to list the Bryde's whale (*Balaenoptera edeni*) as endangered (*Federal Register*, 2016b).

Non-ESA-Listed Marine Mammal Species

One baleen cetacean (Bryde's whale) and 20 toothed cetaceans (including beaked whales and dolphins) that are not listed under ESA regularly occur in the GOM. These are not protected under the ESA; however all marine mammals are protected under the Marine Mammal Protection Act (1972). The only commonly occurring baleen whale in the northern GOM is the Bryde's whale. Most sightings have been made in the De Soto Canyon region and off western Florida, although there have been some in the west-central portion of the northeastern GOM. The best estimate of abundance for Bryde's whales in the northern GOM is 33 individuals (Waring *et al.*, 2016).

Non-ESA-listed toothed cetaceans include all of the dolphin and small whale species in the GOM and comprise 19 species. The *Kogia* species (pygmy and dwarf sperm whales) are small and cryptic whales that inhabit offshore waters. Very little is known of their life history. The beaked whales have been highly publicized in the last several years due to strandings and deaths attributed to military sonar. Beaked whales are not as small as *Kogia*, but they are just as difficult to survey. As with *Kogia*, very little is known about beaked whales (Waring *et al.*, 2016).

Additional information on non-ESA-listed marine mammal species of the GOM is provided in Chapter 4.2 of the Multisale EIS and 2018 SEIS, and in the NMFS 2015 SAR (Waring *et al.*, 2016) and is incorporated by reference into this SEA.

3.5.2. Impact Analysis

A detailed impact analysis of the routine, accidental, and cumulative impacts of the proposed activities on marine mammals can be found in Chapters 4.9 of the Multisale EIS and 2018 SEIS, and is incorporated by reference. The IPFs with the proposed activities in Mississippi Canyon Block 727 that could affect marine mammals include: (1) vessel noise and collisions; (2) marine debris; (3) water-quality degradation from drilling rig effluents; (4) oil spills and spill-response activities; and (5) drilling noise. These IPFs are the same for non-threatened and non-endangered marine mammal species as well as those listed under the ESA.

3.5.2.1. Alternative 1

If selected, Alternative 1, the no action alternative, would result in the operator not undertaking the proposed activities as described in the plan. Therefore, the IPFs to marine mammals would not occur. These factors include vessel/drilling noise that would result in behavioral change, masking, or non-auditory effects to marine mammals, no long-term or permanent displacement of the animals from preferred habitats, and no destruction or adverse modification of any habitats. Because there would be no support vessel traffic related to the drilling operation, there would be no risk of collisions with marine mammals, and there would be no water degradation as a result of the proposed activities.

3.5.2.2. Alternative 2

If selected, Alternative 2, the proposed action, would result in the operator undertaking the proposed activities, as requested and conditioned in the plan. The operator has proposed adherence with the guidance provided under BSEE NTL No. 2015-G03 (*Marine Trash and Debris Awareness and Elimination*) and BOEM NTL No. 2016-G01, (*Vessel Strike Avoidance and Injured/Dead Protected Species Reporting*) (Kosmos, 2018). Compliance with the regulations as clarified in these NTLs should negate or lessen the chance of significant impacts to marine mammals under this alternative.

Routine Operations

Vessel Noise and Collisions

The proposed activities are expected to require several roundtrip supply-vessel and crew-vessel trips per week. Deep-diving whales may be more vulnerable to vessel strikes given the longer surface period required to recover from extended deep dives. Given NMFS has determined vessel strikes to be a discountable concern for sperm whales (USDOC, NMFS, 2007), a deep-diving species, the faster diving marine mammal species with less surface recovery time would be expected to have even less risk of vessel strikes.

In 1995, an oil crew workboat struck and killed a manatee in a canal near coastal Louisiana (Fertl *et al.*, 2005). Manatees are infrequently found in water depths where the activities are proposed, though some recent deepwater sightings have occurred. As of April 2014, five manatee sightings have been reported in

the deepwater of the GOM. These include three sightings from Protected Species Observers (PSO) on seismic vessels and two visual observations from a drilling rig and ship at depths ranging from 465 to 6,000 ft (142 to 1,829 m). Sightings at these depths are uncommon. Seismic survey operations should pose little, if any, risk to them. The dominant source of noise from vessels is from the propeller operation, and the intensity of this noise is largely related to ship size and speed. Vessel noise from the proposed action will produce low levels of noise, generally in the 150 to 170 dB re 1 μ Pa-m at frequencies below 1,000 Hz. Vessel noise is transitory and generally does not propagate at great distances from the vessel. As a result, the NMFS 2007 ESA Biological Opinion concluded that the effects to sperm whales from vessel noise are discountable (USDOC, NMFS, 2007).

The noise and the shadow from helicopter overflights, take-offs, and landings can cause a startle response and can interrupt whales and dolphins while resting, feeding, breeding, or migrating (Richardson et al., 1995). The Federal Aviation Administration's Advisory Circular 91-36D (September 17, 2004) encourages pilots to maintain higher than minimum altitudes over noise-sensitive areas. Guidelines and regulations put in place by NOAA Fisheries under the authority of the Marine Mammal Protection Act include provisions specifying that helicopter pilots maintain an altitude of 1,000 ft (305 m) within 300 ft (91 m) of marine mammals. The proposed action is expected to have helicopter support with multiple transits between the MODU and airbase. Since these occurrences would be temporary and pass within seconds, marine mammals are not expected to be adversely affected by routine helicopter traffic operating at prescribed altitudes.

Atmospheric noise inputs, however, are negligible relative to other sources of noise that are propagated in water (e.g., vessel traffic and platform and drill rig operations). Noise from service-vessel traffic may elicit a startle and/or avoidance reaction from whales and dolphins or mask their sound reception. There is the possibility of short-term disruption of movement patterns and behavior, but such disruptions are unlikely to affect survival or productivity. The behavioral disruptions potentially caused by noise and the presence of service-vessel traffic will have negligible effects on cetacean populations in the northern GOM.

Drilling activities would produce sounds transmitted into the water at intensities and frequencies that could be heard by cetaceans. Noise from drilling could be intermittent, sudden, and at times high intensity as operations take place. Sound from a fixed, ongoing source like an operating drillship is continuous. However, the distinction between transient and continuous sounds is not absolute on a drillship as generators and pumps operate essentially continuously, but there are occasional transient bangs and clangs from various impacts during operations (Richardson et al. 1995). Drilling from semi-submersible vessels estimated frequencies are broadband from 80-4000 Hz with an estimated source level (SL) of 154 dB re 1 μ Pa at 1 m. Tones of 60 Hz was SLs of 149 dB, 181 Hz was 137 dB, and 301 Hz was 136 dB (Greene, 1986). The potential effects that water-transmitted noise has on marine mammals include disturbance (subtle changes in behavior, interruption of previous activities, or short- or long-term displacement), masking of sounds (calls from conspecifics, reverberations from own calls, and other natural sounds such as surf or predators), physiological stress, and hearing impairment. Individual marine mammals exposed to recurring disturbance could be negatively affected. Malme et al. (1986) observed the behavior of feeding gray whales in the Bering sea during four experimental playbacks of drilling sounds (50 to 315 Hz; 21-min overall duration and 10% duty cycle; source levels 156 to 162 dB re: 1 μ Pa-m). In two cases for received levels (RLs) 100 to 110 dB re: 1 μ Pa, there was no observed behavioral reaction. Avoidance behavior was observed in two cases where RLs were 110 to 120 dB re: 1 μ Pa. These source levels are all below NMFS' current 160 dB level B harassment threshold under the MMPA.

The source levels from drilling are relatively low (154 dB and below, as cited by Greene, 1986 in Richardson et al. (1995), below the level B (behavioral) harassment threshold of 160 dB (set by NMFS). According to Southall et al. (2007), for behavioral responses to nonpulses (such as drill noise), data indicate considerable variability in received levels associated with behavioral responses. Contextual variables (such as novelty of the sound to the marine mammal and operation features of the sound source) appear to have been at least as important as exposure level in predicting response type and magnitude. While there are some data from the Arctic on baleen whales, there is little information on the behavioral responses by marine mammals to drilling noise in the GOM. Southall et al. (2007) summarized the existing research, stating that the probability of avoidance and other behavioral affects increases when received levels increase from 120 to 160 dB. Marine mammals may exhibit some avoidance behaviors, but their behavioral or physiological responses to noise associated with the proposed project are unlikely to have population-level impacts in the northern GOM.

Marine Debris

Many types of plastic materials end up as solid waste during drilling and production operations. Some of this material is accidentally lost overboard where cetaceans could consume it or become entangled in it. The incidental ingestion of marine debris and entanglement could adversely affect marine mammals. The operator has proposed adherence with the guidance provided under BSEE NTL No. 2015-G03 (*Marine Trash and Debris Awareness and Elimination*), which appreciably reduces the likelihood of marine mammals encountering marine debris by reducing the amount of accidental release from the proposed activity (Kosmos, 2018).

Water Degradation

Most operational discharges are diluted and dispersed when released in offshore areas and are considered to have sublethal effects (NRC, 1983; API, 1989; Kennicutt, 1995; Kennicutt et al., 1996). Any potential impacts from drilling fluids would be indirect, either as a result of impacts to prey species or possibly through ingestion via the food chain (Neff et al., 1989). Marine mammals generally are thought to be inefficient assimilators of petroleum compounds within prey (Neff, 1990).

Accidental Events

Oil Spills and Response Activities

The oil from an oil spill can adversely affect cetaceans by causing soft tissue irritation, fouling of baleen plates, respiratory stress from inhalation of toxic fumes, food reduction or contamination, direct ingestion of oil and/or tar, and temporary displacement from preferred habitats. The long-term impacts to marine mammal populations are poorly understood but could include decreased survival and lowered reproductive success. The range of toxicity and degree of sensitivity to oil hydrocarbons and the effects of cleanup activities on cetaceans are unknown. One assumption concerning the use of dispersants is that chemical dispersion of oil will considerably reduce the impacts to seabirds and aquatic mammals, primarily by reducing their exposure to petroleum hydrocarbons (French-McCay 2004; NRC, 2005). Chemical dispersant application during an oil spill may lower the amount of oil to which a bird or aquatic mammal is exposed while increasing the potential loss of the insulative properties of feathers or fur through the reduction of surface tension at the feather/fur-water interface (NRC, 2005).

Impacts from the dispersants are unknown but dispersants may contain ingredients that are known to irritate sensitive tissues of seabirds and marine mammals (NRC, 2005). There have been no experimental studies and only a handful of observations suggesting that oil has harmed any manatees (St. Aubin and Lounsbury, 1990). Types of impacts to manatees and dugongs from contact with oil include: (1) asphyxiation due to inhalation of hydrocarbons; (2) acute poisoning due to contact with fresh oil; (3) lowering of tolerance to other stress due to the incorporation of sublethal amounts of petroleum components into body tissues; (4) nutritional stress through damage to food sources; and (5) inflammation or infection and difficulty eating due to oil sticking to the sensory hairs around their mouths (Preen, 1989, in Sadiq and McCain, 1993, AMSA, 2003). For a population whose environment is already under great pressure, even a localized incident could be significant (St. Aubin and Lounsbury, 1990). Spilled oil might affect the quality or availability of aquatic vegetation, including seagrasses, upon which manatees feed.

In the event of catastrophic spill similar to the *Deepwater Horizon* spill, the “Catastrophic Spill Event Analysis” white paper (USDOJ, BOEM, 2017c) discusses the most likely and most significant impacts to marine mammals as it relates to the four phases of a major spill/blowout:

- 1) **Initial Event** (Section 2.2.2.3.; Page B-6);
- 2) **Offshore Spill** (Section 3.2.2.3; Page B-18);
- 3) **Onshore Contact** (Section 4.2.2.3; Page B-32); and
- 4) **Post-Spill, Long-Term Recovery** (Section 5.2.2.3; Page B-41).

In the event of a catastrophic spill similar to the *Deepwater Horizon* spill, any substantive impact to marine mammals is very unlikely because the potential impacts from a catastrophic spill would be similar to aforementioned routine and accidental issues. However, despite the recent *Deepwater Horizon* spill, historical trends in the GOM (see **Chapter 1.4**) indicate that catastrophic spill events are not likely to occur as a result of the proposed action.

Cumulative Impact Analysis

The proposed action may cumulatively affect protected cetaceans when viewed in light of the *Deepwater Horizon* explosion, spill, and response. Marine mammals could be impacted by oil and gas leasing, exploration, development and production activities including the degradation of water quality resulting from operational discharges; vessel traffic; noise generated by platforms, drilling rigs, helicopters, and vessels; seismic surveys; explosive structure removals; oil spills; oil-spill-response activities; and loss of debris from service vessels and OCS structures. The cumulative impact on marine mammals is expected to result in a number of chronic and sporadic sublethal effects (i.e., behavioral effects and nonfatal exposure to or intake of OCS-related contaminants or discarded debris) that may stress and/or weaken individuals of a local group or population and predispose them to infection from natural or anthropogenic sources (Harvey and Dahlheim, 1994).

Few deaths are expected from chance vessel collisions and ingestion of plastic material. Disturbance (noise from vessel traffic and drilling operations, etc.) and/or exposure to sublethal levels of toxins and anthropogenic contaminants may stress animals, weaken their immune systems, and make them more vulnerable to parasites and diseases that normally would not be fatal (Harvey and Dahlheim, 1994). The net result of any disturbance will depend upon the size and percentage of the population likely to be affected, the ecological importance of the disturbed area, the environmental and biological parameters that influence an animal's sensitivity to disturbance and stress, and the accommodation time in response to prolonged disturbance (Geraci and St. Aubin, 1980).

The effects of the proposed action, when viewed in light of the effects associated with other relevant activities, may impact marine mammals in the GOM. However, the operator is required to follow all existing lease stipulations and regulations as clarified by NTLs. Because of the operator's reaffirmed compliance with BOEM NTL No. 2016-G01 (*Vessel-Strike Avoidance and Injured/Dead Protected Species Reporting*) and BSEE NTL No. 2015-G03 (*Marine Trash and Debris Awareness and Elimination*), as well as the limited scope, timing, and geographic location of the proposed action, effects from the proposed activities on marine mammals will be negligible. Therefore, no significant cumulative impacts to marine mammals would be expected as a result of the proposed activities when added to the impacts of past, present, or reasonably foreseeable oil and gas development in the area as well as other activities in the area.

Conclusion

The sections above discuss the potential range of effects to marine mammals from the proposed activity and any of these effects has the potential individually or cumulatively to result in impacts to marine mammal species commonly found in the GOM and proposed action area. However, BOEM finds that the potential for such effects from the proposed action are unlikely to rise to significant levels for the following reasons:

- Mysticetes, as low-frequency hearing specialists, are the species groups most likely to be susceptible to impacts from nonpulse sound (intermittent or continuous) given that their hearing ranges overlap most closely with the noise frequencies produced from drilling (Southall et al., 2007). However, most mysticete species that may occur in the GOM (i.e., North Atlantic right, blue, fin, sei, humpback, and minke) are considered either "extralimital," "rare," or "uncommon" within the GOM (Wursig et al., 2000; Waring et al., 2016). The only commonly occurring baleen whale in the northern GOM is the Bryde's whale which is limited in its range. Given the small geographic scope of the proposed action, the presence of these species within the action area is unlikely.
- The remaining marine mammal species in the GOM are considered either mid-frequency hearing specialists (e.g., sperm whales, beaked whales, and dolphins) with hearing ranges that slightly overlap with sound frequencies produced from drilling noise (Southall et al., 2007), or high-frequency specialists (pygmy and dwarf sperm whales). It is expected that there will be some overlap in the frequencies of the drill source and the hearing thresholds of the marine mammals present in the GOM. Greene (1986) estimated the broadband frequencies of semi-submersible drill vessels to be from 80-4000 Hz with an estimated SL of 154 dB re 1 μ Pa at 1 m. A tone of 60 Hz had a source level of 149 dB, 181 Hz was 137 dB, and 301 Hz was 136 dB. Wartzok and Ketten (1999) stated that bottlenose dolphins have hearing thresholds ranging from less than 5 kHz to over 100 kHz, Ridgway and Carder (2001) found, through auditory brainstem analysis, that pygmy sperm whales have thresholds from 90 to 150 kHz. Gordon et al. (1996) found that a stranded

sperm whale had lower hearing limits at around 100 Hz while Ridgway and Carder (2001) found that a sperm whale calf had best hearing sensitivity between 5 and 20 kHz. Since there is some overlap in drilling and vessel sound levels produced and hearing thresholds of marine mammals, there is potential for the drilling noise produced to cause auditory and non-auditory effects, permanent threshold shift (PTS), temporary threshold shift (TTS), behavioral changes, or masking but it is expected to be limited.

- The NMFS sets the 180-dB root-mean-squared (rms) isopleth where on-set of auditory injury or mortality (level A harassment) to cetaceans may occur. Southall et al. (2007) suggests this level should rather be at 230 dB rms for a nonpulsed sound, such as drilling noise. Richardson et al. (1995) cited Greene (1986) and stated drilling from semisubmersible vessels have estimated broadband frequencies from 80-4000 Hz with an estimated source level of 154 dB re 1 microPa at 1 m. Tones of 60 Hz have source levels of 149 dB, while 181 Hz have source levels of 137 dB, and 301 Hz have source levels of 136 dB. These source levels all fall below the 180 dB level A harassment isopleths.
- The operator proposes adherence with the guidance provided under BSEE NTL No. 2015-G03, (Marine Trash and Debris Awareness and Elimination), which appreciably reduces the likelihood of marine mammals encountering marine debris from the proposed activity (Kosmos, 2018).

The geographic scope of the proposed action is small in relation to the ranges of marine mammals in the GOM. The proposed activities are not expected to cause long-term or permanent displacement of the animals from preferred habitats, nor will they result in the destruction or adverse modification of any habitats. In conclusion, the scope, timing, and transitory nature of the proposed action and the condition/s of approval and monitoring requirements in place, the noise related to the proposed drilling operation is not expected to result in PTS, TTS, behavioral change, masking, or non-auditory effects to marine mammals in the GOM that would rise to the level of significance.

3.5.2.3. Alternative 3

If selected, Alternative 3, the proposed action with additional condition(s) of approval, would allow the operator undertaking the proposed activities, as requested and conditioned in the plan; however, the operator would be required to undertake additional condition(s) of approval as identified by BOEM. Because the operator is required to follow all existing lease stipulations and regulations as clarified by NTLs, conditions outlined in the previous analyses related to BOEM NTL No. 2016-G01 should negate or lessen the chance of a significant impact to marine mammals. The condition of approval outlined in Chapter 2.4 is not expected to increase or decrease the potential for effects to marine mammals from the proposed action. Alternative 3 does not differ from Alternative 2 because the additional condition(s) of approval measures do not address this resource (i.e., all assumptions, estimates, and conclusions are identical), see the analysis provided in Chapter 3.5 for this alternative for this resource.

3.6. SEA TURTLES

3.6.1. Affected Environment

The life history, population dynamics, status, distribution, behavior, and habitat use of sea turtles can be found in Chapter 4.9 of the Multisale EIS and 2018 SEIS, and is incorporated by reference. Of the extant species of sea turtles, five are known to inhabit the waters of the GOM (Pritchard, 1997): the leatherback, green, hawksbill, Kemp's ridley, and loggerhead. These five species are all highly migratory, and individual animals will migrate into nearshore waters as well as other areas of the North Atlantic Ocean, GOM, and Caribbean Sea. All five species of sea turtles found in the GOM have been federally listed as endangered or threatened since the 1970's. Critical habitat has been designated for the Northwest Atlantic Ocean Loggerhead sea turtle population segment (DPS) in the GOM (*Federal Register*, 2014).

In 2007, FWS and NMFS published 5-year status reviews for all federally listed sea turtles in the GOM (USDOC, NMFS and USDOl, FWS, 2007a-e). A 5-year review is an ESA-mandated process that is conducted to ensure that the listing classification of a species as either threatened or endangered is still accurate. As of 2013, two 5-year reviews have been updated for the Leatherback and Hawksbill sea turtles (USDOC, NMFS and USDOl, FWS, 2013a and b). Both agencies share jurisdiction for federally listed sea turtles and jointly conducted the reviews. After reviewing the best scientific and commercially available

information and data, agencies determined that the current listing classification for the five sea turtle species remain unchanged.

3.6.2. Impact Analysis

A detailed impact analysis of the routine, accidental, and cumulative impacts of the proposed activities on sea turtles can be found in Chapters 4.9 of the Multisale EIS and 2018 SEIS, and is incorporated by reference. The diversity of a sea turtle's life history leaves it susceptible to many natural and human impacts, including impacts while it is on land, in the benthic environment, and in the pelagic environment. The IPFs associated with the proposed activities in Mississippi Canyon Block 727 that could affect sea turtles include: (1) vessel noise and collisions; (2) marine debris; (3) water-quality degradation from drilling rig effluents; (4) oil spills and spill-response activities; and (5) drilling noise.

3.6.2.1. Alternative 1

If selected, Alternative 1, the no action alternative, would result in the operator not undertaking the proposed activities as described in the plan. Therefore, the IPFs to sea turtles would not occur. For example, there would be no vessel noise or drilling noise that would result in behavioral change, masking, or non-auditory effects to sea turtles, no long-term or permanent displacement of the animals from preferred habitats, and no destruction or adverse modification of any habitats. Since there would be no vessel traffic related to the drilling operation, there would be no risk of collisions with sea turtles.

3.6.2.2. Alternative 2

If selected, Alternative 2, the proposed action, would result in the operator undertaking the proposed activities, as requested and conditioned in the plan. The operator has proposed adherence with the guidance provided under BSEE NTL No. 2015-G03 (*Marine Trash and Debris Awareness and Elimination*) and BOEM NTL No. 2016-G01 (*Vessel Strike Avoidance and Injured/Dead Protected Species Reporting*) (Kosmos, 2018). Compliance with the regulations as clarified in these NTLs should negate or lessen the chance of significant impacts to sea turtles under this alternative.

Routine Operations

Vessel Noise and Collisions

An IPF associated with the proposed action that could affect ESA-listed sea turtles is impacts from vessel noise and vessel collisions. The dominant source of noise from vessels is propeller operation, and the intensity of this noise is largely related to ship size and speed. Vessel noise from the proposed action would produce low levels of noise, generally in the 150 to 170 dB re 1 μ Pa-m at frequencies below 1,000 Hz. Vessel noise is transitory and generally does not propagate at great distances from the vessel. Also, available information indicates that sea turtles do not greatly utilize environmental sound. As a result, the NMFS 2007 Biological Opinion concluded that effects to sea turtles from vessel noise are discountable (USDOC, NMFS, 2007).

Drilling activities would produce sounds transmitted into the water that could be intermittent, sudden, and at times could be high intensity as operations take place. However, sea turtles are not expected to be impacted by this disturbance because NMFS in their 2007 Biological Opinion determined that "drilling is not expected to produce amplitudes sufficient to cause hearing or behavioral effects to sea turtles or sperm whales; therefore, these effects are insignificant."

Popper et al. (2014), published sound exposure guidelines for fishes and sea turtles. The guidelines were broad-ranging and provided non-quantified, generalized guidelines for shipping noise as a low risk of impairment, unless the turtle is in the near field range (within tens of meters), which would pose a moderate risk of temporary threshold shift (TTS) that can recover over time. Risk for noise to cause masking and behavior effects range from low to high depending on the location of the turtle relative to the noise (Popper et al., 2014).

Sea turtles spend at least 3-6 percent of their time at the surface for respiration and perhaps as much as 26 percent of time at the surface for basking, feeding, orientation, and mating (Lutcavage et al., 1997). Data show that collisions with all types of commercial and recreational vessels are a cause of sea turtle mortality in the GOM (Lutcavage et al., 1997). Stranding data for the U.S. Gulf and Atlantic Coasts, Puerto Rico, and the U.S. Virgin Islands show that between 1986 and 1993 about 9 percent of living and dead stranded sea turtles had boat strike injuries (Lutcavage et al., 1997). Vessel-related injuries were noted in 13 percent

of stranded turtles examined from the GOM and the Atlantic during 1993 (Teas, 1994), but this figure includes those that may have been struck by boats post-mortem. Large numbers of loggerheads and 5-50 Kemp's ridley turtles are estimated to be killed by vessel traffic per year in the U.S. (NRC, 1990; Lutcavage et al., 1997).

There have been no known documented sea turtle collisions with drilling and service vessels in the GOM; however, collisions with small or submerged sea turtles may go undetected. Based on sea turtle density estimates in the GOM, the encounter rates between sea turtles and vessels would be expected to be greater in water depths less than 200 m (USDOC, NMFS, 2007). Additionally, recent satellite tracking studies have provided data to support that larger turtles often remain closer to shore to feed, nest and/or migrate; for loggerheads (Hart et al., 2013 and 2014) and Kemp's ridleys (Shaver et al., 2014). To further minimize the potential for vessel strikes, BOEM issued NTL No. 2016-G01, which clarifies 30 C.F.R. § 550.282 and provides NMFS guidelines for monitoring procedures related to vessel strike avoidance measures for sea turtles and other protected species. With implementation of these measures and the avoidance of potential strikes from OCS vessels, the NMFS 2007 Biological Opinion concluded that the risk of collisions between oil/gas-related vessels (including those for G&G, drilling, production, decommissioning, and transport) and sea turtles is appreciably reduced, but strikes may still occur. BOEM monitors for any takes that have occurred as a result of vessel strikes and also requires that any operator immediately report the striking of any animal (see 30 C.F.R. § 550.282 and BOEM NTL No. 2016-G01).

To date, there have been no known reported strikes of sea turtles by drilling vessels. Given the scope, timing, and transitory nature of the proposed action and with this established condition(s) of approval, effects to sea turtles from drilling vessel collisions is expected to be negligible.

Marine Debris

Many types of plastic materials end up as solid waste during drilling and production operations. Some of this material is accidentally lost overboard where sea turtles could consume it or become entangled in it. The incidental ingestion of marine debris and entanglement could adversely affect sea turtles. As proposed in their plan, the operator proposes compliance with the guidelines provided in BSEE NTL No. 2015-G03 (*Marine Trash and Debris Awareness and Elimination*), which appreciably reduces the likelihood of sea turtles encountering marine debris from the proposed activity.

Water Degradation

Most operational discharges are diluted and dispersed when released in offshore areas and are considered to have sublethal effects (NRC, 1983; API, 1989; Kennicutt, 1995; Kennicutt et al., 1996). Any potential impacts from drilling fluids would be indirect, either as a result of impacts to prey species or possibly through ingestion via the food chain (Neff et al., 1989). Impacts from water degradation are expected to be negligible due to the localized nature of the proposed activity and the wide-ranging habits of sea turtle species in the GOM.

Accidental Events

Oil Spills and Response Activities

The oil from an oil spill can adversely affect sea turtles by causing soft tissue irritation, respiratory stress from inhalation of toxic fumes, food reduction or contamination, direct ingestion of oil and/or tar, and temporary displacement from preferred habitats (Lutz and Lutcavage, 1989). The long-term impacts to sea turtle populations are poorly understood but could include decreased survival and lowered reproductive success. The range of toxicity and degree of sensitivity to oil hydrocarbons and the effects of cleanup activities on sea turtles are unknown. Impacts from the dispersants are unknown, but may have similar irritants to tissues and sensitive membranes as they are known to have had on seabirds and marine mammals (NRC, 2005).

In the event of a catastrophic spill similar to the *Deepwater Horizon* spill, the "Catastrophic Spill Event Analysis" white paper (USDOI, BOEM, 2017c) discusses the most likely and most significant impacts to sea turtles as it relates to the four phases of a major spill/blowout:

- 1) **Initial Event** (Section 2.2.2.4.; Page B-7);
- 2) **Offshore Spill** (Section 3.2.2.4; Page B-19);

- 3) **Onshore Contact** (Section 4.2.2.4; Page B-33); and
- 4) **Post-Spill, Long-Term Recovery** (Section 5.2.2.4; Page B-41).

In the event of a catastrophic spill similar to the *Deepwater Horizon* spill, any substantive impact to sea turtles is very unlikely because the potential impacts from a catastrophic spill would be similar to aforementioned routine and accidental issues. However, despite the *Deepwater Horizon* spill, historical trends in the GOM (see Chapter 1.4) indicate that catastrophic spill events are not likely to occur as a result of the proposed action.

Cumulative Impact Analysis

Activities considered under the cumulative scenario, including the proposed action, may affect sea turtles. Sea turtles may be impacted by oil and gas leasing, exploration, development and production activities including the degradation of water quality resulting from operational discharges, vessel traffic, noise generated by platforms, drilling rigs, helicopters and vessels, seismic surveys, explosive structure removals, oil spills, oil-spill-response activities, loss of debris from service vessels and OCS structures, commercial fishing, capture and removal, and pathogens. The cumulative impact of these ongoing OCS activities on sea turtles is expected to result in a number of chronic and sporadic sublethal effects (i.e., behavioral effects and nonfatal exposure to or intake of OCS-related contaminants or discarded debris) and that may stress and/or weaken individuals of a local group or population and that may predispose them to infection from natural or anthropogenic sources.

Few deaths are expected from chance collisions with OCS service vessels, ingestion of plastic material, commercial fishing, and pathogens. Disturbance (noise from vessel traffic and drilling operations, etc.) and/or exposure to sublethal levels of toxins and anthropogenic contaminants may stress animals, weaken their immune systems, and make them more vulnerable to parasites and diseases that normally would not be fatal during their life cycle. The net result of any disturbance depends upon the size and percentage of the population likely to be affected, the ecological importance of the disturbed area, the environmental and biological parameters that influence an animal's sensitivity to disturbance and stress, or the accommodation time in response to prolonged disturbance (Geraci and St. Aubin, 1980). As discussed above, lease stipulations and regulations are in place to reduce vessel strike mortalities.

Incremental injury effects from the proposed action on sea turtles are expected to be negligible for drilling and vessel noise and minor for vessel collisions, but will not rise to the level of significance because of the limited scope, duration, and geographic area of the proposed drilling and vessel activities and the relevant regulatory requirements.

The effects of the proposed action, when viewed in light of the effects associated with other relevant activities, may affect sea turtles occurring in the GOM. With the enforcement of regulatory requirements for drilling and vessel operations and the scope of the proposed action, incremental effects from the proposed activities on sea turtles will be negligible (drilling and vessel noise) to minor (vessel strikes). The best available scientific information indicates that sea turtles do not greatly use sound in the environment for survival; therefore, disruptions in environmental sound would have little effect. Consequently, no significant cumulative impacts would be expected from the proposed activities or as the result of past, present, or reasonably foreseeable oil and gas leasing, exploration, development and production in the GOM.

Conclusion

The sections above discuss the potential range of effects to sea turtles from the proposed action, including: (1) vessel noise and collisions; (2) marine debris; (3) water-quality degradation from drilling rig effluents; and (4) oil spills and spill-response activities. The potential effects of the proposed activity on sea turtles will not rise to the level of significance for the following reasons:

- The best available scientific information indicates that sea turtles do not greatly use sound in the environment for survival; therefore, disruptions in environmental sound would have little effect.
- The scope, timing, and transitory nature of the proposed action will produce limited amounts of drilling noise in the environment. As described, effects of vessel noise on sea turtles are considered "discountable" (USDOC, NMFS, 2007).

- Implementation of the regulations as clarified in BSEE NTL No. 2015-G03 (*Marine Trash and Debris Awareness and Elimination*), appreciably reduces the likelihood of sea turtles encountering marine debris from the proposed activity.

The risk of collisions between sea turtles and vessels associated with the proposed action exists but would not rise to the level of significance given:

- Under 30 C.F.R. § 550.282 clarified by BOEM NTL No. 2016-G01 (*Vessel Strike Avoidance and Injured/Dead Protected Species Reporting*), BOEM provides guidelines for the monitoring programs designed to minimize the risk of vessel strikes to sea turtles and other protected species and the reporting of any observations of injured or dead protected species.
- The NMFS 2007 Biological Opinion determined that monitoring measures should appreciably reduce the potential for vessel strikes. The NMFS issued an Incidental Take Statement on sea turtle species; the Statement contains reasonable and prudent measures (RPM's) with implementing terms and conditions to help minimize take. As the operator has indicated that the vessel strike avoidance guidance (BOEM NTL No. 2016-G01) will be followed, there should be appreciably reduced numbers of sea turtles that may be incidentally taken from routine offshore vessel operations; however, the available information on the relationship between these species and OCS oil and gas activities indicates that sea turtles may be killed or injured by vessel strikes. Therefore, pursuant to Section 7(b)(4) of the ESA, NMFS anticipates incidental take and granted a limited number of Incidental Take Authorizations to BOEM for sea turtle mortalities by vessel strikes. BOEM continues to monitor for any strikes to ensure this authority is not exceeded and to date, none have been reported.
- The scope, timing, and transitory nature of the proposed action will result in limited opportunity for vessel strikes to sea turtles.

3.6.2.3. Alternative 3

If selected, Alternative 3, the proposed action with additional condition(s) of approval, would result in the operator undertaking the proposed activities, as requested and conditioned in the plan; however, the operator would be required to undertake additional condition(s) of approval as identified by BOEM. As with Alternative 2, the operator is required to follow all existing lease stipulations and regulations that would result in negating or lessening the chance of impacts to sea turtles. The condition of approval measures outlined in Chapter 2.4 is not expected to increase or decrease the potential for effects to sea turtles from the proposed action. Alternative 3 does not differ from Alternative 2 because the additional condition of approval measures does not address this resource (i.e., all assumptions, estimates, and conclusions are identical). See the analysis provided in Chapter 3.6. for this alternative for this resource.

3.7. FISH RESOURCES AND ESSENTIAL FISH HABITAT

3.7.1. Affected Environment

A detailed description of the Fish Resources and Essential Fish Habitat (EFH) of the GOM may be found in Chapter 4.7 of Multisale EIS and 2018 SEIS, and is incorporated by reference into this EA. The following section provides a summary of the information found in the Multisale EIS and 2018 SEIS.

EFH is defined as “those waters and substrate necessary to fish for spawning, breeding, feeding, and growth to maturity” [16 U.S.C. § 1801(10)]. These habitats are crucial for maintaining healthy fish resources and fishery stocks. Due to the wide variation of habitat requirements for all life history stages of managed species, NOAA and the Gulf of Mexico Fishery Management Council initially identified EFH throughout the GOM to include all coastal and marine waters and substrates from the shoreline to the seaward limit of the Exclusive Economic Zone (200 mi [322 km] from shore). The EFH final rule summarizing EFH regulation (50 CFR § 600) outlines additional interpretation of the EFH definition. Waters, as defined previously, include “aquatic areas and their associated physical, chemical, and biological properties that are used by fish, and may include aquatic areas historically used by fish where appropriate.” Substrate includes “sediment, hard bottom, structures underlying the waters, and associated biological communities.” Necessary is defined as “the habitat required to support a sustainable fishery and the managed species' contribution to a healthy ecosystem.” “Fish” includes “finfish, mollusks, crustaceans, and all other forms of marine animal and plant life other than marine mammals and birds,” whereas

“spawning, breeding, feeding or growth to maturity” covers the complete life cycle of those species of interest.

The GOM supports a great diversity of fish species, including a wide variety of commercially and recreationally valuable fishes, most of which are linked either directly or indirectly to the estuaries ringing the Gulf. The life history of estuarine-dependent species involves spawning on the continental shelf; the transportation of eggs, larvae, or juveniles back to the estuary nursery grounds; and the migration of the adults back to the sea for spawning. Monthly ichthyoplankton collections over the years 2004-2006 offshore of Alabama confirmed that peak seasons for ichthyoplankton concentrations on the shelf are spring and summer (Hernandez et al., 2010). Additionally, the waters of the northern GOM support many coastal pelagic fishes and highly migratory species, some of which spawn exclusively in this region. The distribution of fish species is related to ecological factors (e.g., salinity, temperature, bottom type, primary production and availability of prey) which vary, sometimes widely, across the Gulf and between inshore and offshore waters. Characteristic fish resources are associated with various environments and are not randomly distributed.

Although a generalized analysis suggests, for locations off the continental shelf, species richness and abundance decrease with depth, Rowe and Kennicutt (2009) found food resources are a dominant factor controlling distribution of deepwater benthos in the GOM. Inputs such as the Mississippi River and hydrocarbon seep communities influence local densities of fauna associated with a given depth zone. Descriptions of ecological groups of fishes that occur in the region, including oceanic pelagics and mesopelagics, can be found in Chapter 4.7 of the Multisale EIS and 2018 SEIS.

3.7.2. Impact Analysis

A detailed impact analysis of the routine, accidental, and cumulative impacts of the proposed activities on fish and essential fish habitat can be found in Chapters 4.7 of the Multisale EIS and 2018 SEIS, and is incorporated by reference. The IPFs associated with exploration activities proposed in Mississippi Canyon Block 727 that could affect EFH and fish resources include: (1) coastal and marine environmental degradation; (2) presence of a MODU; (3) temporary discharge of drilling cuttings and associated drilling fluids; and (4) blowouts and oil spills.

3.7.2.1. Alternative 1

If selected, Alternative 1, the no action alternative, would result in the operator not undertaking the proposed activities as described in the plan. Therefore, the IPFs to fish and EFH would not occur. For example, there would be no drilling noise that would result in behavioral change, masking, or non-auditory effects to the fish resources, no long-term or permanent displacement of fish resources from preferred habitats, and no destruction or adverse modification of any habitats.

3.7.2.2. Alternative 2

If selected, Alternative 2, the proposed action, would result in the operator undertaking the proposed activities, as requested and conditioned in the plan. As described in the analyses below, impacts to fish and EFH from the proposed action are expected to be short-term, localized and not lead to significant impacts.

Routine Activities

Routine activities, such as the discharge of drilling fluids and cuttings offshore would contribute to localized temporary marine environmental degradation. Drilling operations are restricted in time, and pelagic species in the area could easily avoid discharge plumes. Routine discharges from the MODU would be highly diluted in the open marine environment. The presence of the MODU will act as a fish-attracting device for the short period of time the rig is on site; however routine discharges that may impact fish resources will be very limited in duration.

Accidental Events

Accidental blowouts and spills with limited quantities hydrocarbons also have the potential to affect fish resources and EFH, but there is no evidence to date that fish or EFH in the Gulf have been adversely affected at a population level by spills or chronic contamination. At the scale of this SEA, any accidental impact would be limited in scope and affected fishes would likely be replaced by organisms from beyond the area of impact or would be colonized during the next recruitment event. Early life stages of fishes may

be more sensitive than adults to potentially adverse impacts resulting from exposure to hydrocarbons. For this reason, BOEM considers eggs and larval fishes to be at greater risk than adults in the event of exposure to contamination resulting from a spill or blowout. The specific effects of oil on fish can include direct lethal toxicity, sublethal disruption of physiological processes (internal lesions), suffocation due to oil coating gills, incorporation of hydrocarbons causing tainting or accumulation in the food chain, and changes in biological habitat (Moore and Dwyer, 1974; Incardona et al., 2014; Murawski et al., 2014). However, due to typically high fecundity and relatively wide distribution of eggs and larvae, it is unlikely spilled contaminants would overlap spatially and temporally with a fraction of eggs and larvae large enough to significantly impact populations. Furthermore, most adult fishes are expected to avoid adverse environmental conditions, minimizing the potential for impacts resulting from oil and dispersants. Estuaries are important nursery areas (EFH) for fish and aquatic life. Impacts related to oiling of these areas could result in the destruction of marsh habitat, facilitate in the erosion of coastlines, and increase the potential for adversely impacting juvenile fishes. A discussion of the impacts of oil on adult fish, fish eggs, and larvae can be found in Chapter 4.7 of the Multisale EIS and 2018 SEIS. Given that the potential for a blowout or a spill is small, there is a limited possibility for large amounts of oil released from a blowout or spill reaching shore. Additional sensitive habitat features and potential impacts to these habitats are discussed in Chapter 3.4 (Deepwater Benthic Communities) of this document.

Cumulative Impacts

Cumulative activities that could impact fish and EFH include State oil and gas activity, coastal development, crude oil imports by tanker, commercial and recreational fishing, hypoxia (i.e., red or brown tides), removal of OCS structures, and offshore discharges of drilling muds and produced waters. It is expected that environmental degradation from the proposed action and non-OCS activities would affect fish populations and EFH; however, the incremental contribution of the proposed action to these cumulative impacts would be small and almost undetectable. Therefore, no significant cumulative impacts on EFH and fish resources would be expected as a result of the proposed activities when added to the impacts of past, present, or reasonably foreseeable oil and gas development in the area as well as other activities in the area.

Conclusion

The proposed action is expected to have little impact on any fish or EFH endemic to the northern GOM. Specific effects from any one oil spill would depend on several factors, including timing, location, volume and type of oil, environmental conditions, and countermeasures used. If a blowout occurred, ichthyoplankton, fish eggs, or larvae would suffer mortality in areas where their numbers are concentrated and where oil concentrations are high. However, impacts are still expected to be minimal to nonexistent based on the low probability of a spill occurring (see Chapter 1.4).

3.7.2.3. Alternative 3

If selected, Alternative 3, the proposed action with additional condition(s) of approval, would result in the operator undertaking the proposed activities, as requested and conditioned in the plan; however, the operator would be required to undertake additional condition(s) of approval as identified by BOEM. As described in the analyses above, impacts to fish and EFH from the proposed action are expected to be short-term, localized and not lead to significant impacts. The condition of approval outlined in Chapter 2.4 is not expected to increase or decrease the potential for effects to fish and EFH from the proposed action. Alternative 3 does not differ from Alternative 2 because the additional condition of approval does not address this resource (i.e., all assumptions, estimates, and conclusions are identical), see the analysis provided in Chapter 3.7 for this alternative for this resource.

3.8. ARCHAEOLOGICAL RESOURCES

3.8.1. Affected Environment

Archaeological resources are defined in 30 C.F.R. § 550.105 as “any material remains of human life or activity that are at least 50 years of age and that are of archaeological interest.” Archaeological resources on the OCS can be divided into two types: prehistoric and historic. Detailed descriptions of these resource

types are provided in Chapter 4.13 of the Multisale EIS and 2018 SEIS. The following information is a summary of these descriptions, which are hereby incorporated by reference into this SEA.

Prehistoric

Geologic features that have a high probability for associated prehistoric sites in the northwestern and north central Gulf (from Texas to Alabama) include barrier islands, river channels and associated floodplains and terraces, and salt dome features. Also, a high probability for prehistoric resources may exist landward of a line that roughly follows the 60-m bathymetric contour, which represents the Pleistocene shoreline during the last glaciation some 12,000 years ago when the coastal area of Texas and Louisiana is generally considered to have been populated. BOEM is currently reviewing evidence to determine if a change in the currently accepted area of prehistoric site probability is warranted. The water depth in the area of the proposed action precludes the potential for prehistoric sites or artifacts.

Historic

Historic archaeological resources on the federal OCS include shipwrecks and a single light house (Ship Shoal Light). Historic research has identified over 4,000 potential shipwreck locations in the Gulf, with nearly 1,500 of these potential shipwreck locations on the OCS (Garrison et al., 1989). The historic record, however, is by no means complete, and the current ability to predict potential sites has proven inaccurate. As demonstrated by several studies (Pearson et al., 2003; Lugo-Fernandez et al., 2007; Krivor et al., 2011; Rawls and Bowker-Lee, 2011), many more shipwrecks are likely to exist on the seafloor than have been accounted in available historic literature. Currently a high-resolution remote sensing survey is the most reliable method for identifying and avoiding historic archaeological resources.

A 2003 study recommended including some deepwater areas, primarily on the approach to the Mississippi River, among those lease areas requiring archaeological investigation. With this in mind, BOEM revised its guidelines for conducting archaeological surveys in 2005 and added about 1,200 lease blocks to the list of blocks requiring an archaeological survey and assessment. Archaeological survey blocks were further expanded in 2011 and current requirements are posted on the BOEM website under NTL No. 2005-G07 and Joint NTL No. 2011-G01. At present, high-resolution geophysical, ROV, and/or diver survey and investigation is required for bottom disturbing activities.

Historic shipwrecks have, with the exception of three significant vessels found by treasure salvors, been primarily discovered through oil industry sonar surveys in water depths up to 9,000 ft (2,743 m). In the last five years, over four dozen potential shipwrecks have been located and several of these ships have been confirmed visually as historic vessels. Many of these wrecks were not previously suspected to exist in these areas, based on the historic record. The preservation of historic wrecks found in deep water has been outstanding because of a combination of environmental conditions and limited human access.

The *Deepwater Horizon* spill released an estimated 53,000-62,000 bbl of oil per day for almost three months. Much of the oil was treated with dispersant at the sea surface and at the source in a water depth of 5,000 ft (1,524 m). The use of dispersants at the wellhead could result in currently unknown effects from dispersed oil droplets settling to the seafloor and could possibly contaminate exposed artifacts and wood or steel hulls such as those observed on many deepwater sites (Atauz et al., 2006; Church et al., 2007; Church and Warren, 2008; Ford et al., 2008). BOEM recognizes the need to better understand the effects of deep water oil spills and dispersants on submerged archaeological resources and has initiated studies on their effects on deep water shipwrecks and oiling and dispersant effects on specific archaeological materials in order to assist in collection and interpretation of this data.

The best available information does not provide a complete understanding of the effects, if any, of the spilled oil and potential response/cleanup activities on archaeological resources that may be located in deep water. Though information on the actual impacts to submerged archaeological resources is non-existent at this time, oil settling to the seafloor due to dispersant use at the wellhead could come into contact with archaeological resources. At present, there is no evidence of this having occurred. An experimental study has suggested that while the degradation of wood in terrestrial environments is initially retarded by contamination with crude oil; at later stages, the biodeterioration of wood is accelerated (Ejechi, 2003). While there are different environmental constraints that affect the degradation of wood in terrestrial and waterlogged environments, soft-rot fungal activity, one of the primary wood degrading organisms in submerged environments, was shown to be increased in the presence of crude oil.

3.8.2. Impact Analysis

A detailed impact analysis of the routine, accidental, and cumulative impacts of the proposed activities on historic archeological resources can be found in Chapters 4.13 of the Multisale EIS and 2018 SEIS, and is incorporated by reference. The IPF associated with the proposed action that could affect submerged archaeological resources is seafloor disturbance. These discussions also are summarized below and hereby incorporated by reference into this SEA.

The routine IPF associated with Kosmos' proposed development activities in the area of the proposed action that could affect archaeological resources is limited to direct contact or disturbance during well emplacement activities or equipment used for the drilling operations.

The historically-available literature is not sufficient to identify historic shipwreck losses in the area of the proposed action as historic records of losses occurring this far offshore are not location-specific (Pearson et al., 2003; Lugo-Fernandez et al., 2007; Krivor et al., 2011; and Rawls and Bowker-Lee, 2011). However, if a historic resource exists in the area of drilling, direct physical contact with a shipwreck site could destroy fragile materials, such as the hull remains or artifacts, and could disturb the site context (Atauz et al., 2006; Church and Warren, 2008). To date, two historically-significant shipwrecks were found to have suffered damage from drilling activities because of a lack of knowledge of their presence.

The IPFs that could be associated with accidental events include seafloor disturbances from jettisoned/lost debris and, as discussed above, deterioration from potential oil spills. Similar to routine impacts, discarded/lost material that falls to the seabed has the potential to damage and/or disturb archaeological resources. Oil spills and their remediation efforts could also accelerate deterioration of archaeological resources. A detailed discussion of all potential impacts is found below.

3.8.2.1. Alternative 1

If selected, Alternative 1, the no action alternative, would result in the operator not undertaking the proposed activities as described in the plan. Therefore, the IPFs mentioned above (i.e., bottom disturbance associated with well emplacement and the use of equipment associated with drilling operations) would not take place, and any impact that these actions could cause would not occur. Likewise, under the no action alternative, there would be no possibility of a spill. As a result, whatever archaeological resources may be present in the area of potential effect (APE) would not be affected in any way if the no-action alternative was selected.

3.8.2.2. Alternative 2

If selected, Alternative 2, the proposed action, would result in the operator undertaking the proposed activities as requested and conditioned in the plan. Examples of potential impacts to archaeological resources would include, but are not limited to, damage to potential resources from well emplacement, lost/discarded material, and potential impacts from an accidental oil spill. As described in the proposed plan and discussed below, the proposed activities are not expected to have significant impacts on known or unknown historical archaeological resources.

Routine Activities

Impacts to a historic site could result from direct physical contact causing irreversible damage. The undisturbed provenience of archaeological data (i.e., the 3-dimensional location of archaeological artifacts) allows archaeologists to accumulate a record of where every item is found, and to develop a snapshot as to how artifacts relate to other items or the site as a whole. The analysis of artifacts and their provenience is one critical element used to make a determination of eligibility to the National Register of Historic Places and is essential in understanding past human behavior and ways of life. Impacts from the proposed operations could alter the provenience and destroy fragile remains, such as the hull, wood, glass, ceramic artifacts and possibly even human remains, or information related to the operation or purpose of the vessel. The destruction and loss of this data eliminate the ability of the archaeologist to fully and accurately detail activity areas found at the site, variation and technological advances lost to history, the age, function, and cultural affiliation of the vessel, and its overall contribution to understanding and documenting the maritime heritage and culture of the region.

BOEM's regulation 30 CFR § 550.194 requires that an archaeological survey be conducted prior to development of leases within the high-probability zones for historic and prehistoric archaeological

resources. Currently Mississippi Canyon Block 727 is designated as a high-probability block. At present, some form of survey is required for all new bottom disturbing activities. No targets that may represent significant archaeological resources were identified in the high-resolution geophysical survey conducted in near/within the area of Kosmos' proposed activity.

Accidental Events

Although unlikely, accidental blowouts and spills from the proposed action could lead to oil contact with submerged archaeological resources. While there is no information on the actual impacts of the *Deepwater Horizon* spill on submerged archaeological resources, should an accidental blowout and spill occur during the operator's proposed action, oil may settle on the seafloor due to dispersant use at the wellhead and could come into contact with archaeological resources. Although there is uncertainty and limited data on the effects of an oil spill at depth on submerged archaeological resources, an experimental study has suggested that while the degradation of wood in terrestrial environments is initially retarded by contamination with crude oil; at later stages, the biodeterioration of wood is accelerated (Ejechi, 2003). While there are different environmental constraints that affect the degradation of wood in terrestrial and waterlogged environments, soft-rot fungal activity, one of the primary wood degrading organisms in submerged environments, was shown to be increased in the presence of crude oil. No impacts are expected from marine remediation efforts because bottom-disturbing activities are not anticipated due to the water depth.

Another IPF that could result from an accidental event is from the loss of debris from the MODU during drilling operations. Debris such as structural components (i.e., grating, wire, tubing, etc.), boxes, pallets, and other loose items can become dislodged during heavy seas or storm events and fall to the seabed. Similarly, thousands of joints of drill pipe are used during drilling operations; requiring regular transport out to the MODU via workboats. There is the potential to lose pieces of drill pipe during transfer operations or when "tripping pipe" in and out of the wellbore. Similar to the impacts noted under Routine Activities, if lost drill pipe or debris were to fall onto an unknown archaeological resource near the well sites, damage could destroy fragile materials, such as hull remains and artifacts, and could disturb the site's context and associated artifact assemblage. Additionally, lost material could result in the masking of actual archaeological resources or the introduction of false targets that could be mistaken in the remote sensing record as historic resources.

In the event of a catastrophic spill similar to the *Deepwater Horizon* spill, any substantive impact to archaeological resources is very unlikely because the potential impacts from a catastrophic spill would be similar to aforementioned routine and accidental issues. However, despite the recent *Deepwater Horizon* spill, historical trends in the GOM (see Chapter 1.4) indicate that catastrophic spill events are not likely to occur as a result of the proposed action.

Cumulative Analysis

Cumulative impacts on unknown archaeological resources that may be present in the area of the proposed action could result from other GOM activities. Since the maximum water depth at the proposed well sites is 4,975 ft (1,516 m) and the area of the proposed action is over 54 mi (87 km) from shore, those activities would be limited to commercial fishing, marine transportation, and adjacent oil and gas exploration, development, and production operations.

During adjacent oil and gas operations, commercial fishing, and maritime transportation activities, there is associated loss or discard of debris that could result in the masking of archaeological resources or the introduction of false targets that could be mistaken in the remote sensing record as historic resources. Future exploration, development, and production operations and/or any related infrastructure support could lead to bottom disturbances in the area of the proposed action; however, no additional activities have been proposed or are under review at this time. Similarly, geological and geophysical (G&G) surveys have been permitted near the area of the proposed action. These surveys may involve the seabed deployment of receivers and associated anchors that have the potential to damage unknown archaeological resources that may exist in the area of the proposed action; however, their small size and relatively light weight (~65 lbs [34 kg]) is not expected to cause significant impacts.

Any known or unknown archaeological resources that may be present in Mississippi Canyon Block 727 could be impacted by contact with oil from a blowout or spill from adjacent oil and gas operations. Similarly, cumulative impacts from accidental oil spills and remediation efforts for adjacent oil and gas

operations are not expected because of the water depth at the proposed site and the historically low probability of a loss of well control/blowout.

Considering the potential cumulative impacts from all other GOM activities, the operator's proposed activities would constitute the primary effect, if any, on any known or unknown archaeological resource that may exist in the area of the proposed action. However, based on the archaeological assessment conclusions, there is no reason to believe that the proposed action would result in the disturbance of archaeological resources. Therefore, no significant cumulative impacts are expected as a result of the proposed action when added to the impacts of past, present, or reasonably foreseeable oil and gas development in the area as well as other proximal activities.

Conclusion

Based on the previous information and the survey conclusions, there is no reason to believe that archaeological resources could be present in the area of the proposed action. If an unknown archaeological resource were to exist where bottom-disturbing operations are proposed to occur, and the operator were unaware of its existence prior to disturbing the bottom, the operator's activities might have a significant impact on that resource. Such impact would be damage and/or disturbance to the resource from drilling of the well and from associated equipment. Impacts from accidental events related to the proposed action such as accidental oil spills and their remediation efforts are not expected because of the water depth at the well site and the historically low probability of a loss of well control/blowout. However, debris resulting from accidental events could lead to impacts similar to those expected from routine impacts such as contact with the well and/or well equipment.

3.8.2.3. Alternative 3

If selected, Alternative 3, the proposed action with additional condition/s of approval, would result in the operator undertaking the proposed activities, as requested and conditioned in the plan; however, the operator would be required to undertake additional condition/s of approval as identified by BOEM. The condition of approval outlined in Chapter 2.4 is not expected to increase or decrease the potential for effects to archaeological from the proposed action. Alternative 3 does not differ from Alternative 2 because the additional condition of approval does not address this resource (i.e., all assumptions, estimates, and conclusions are identical), see the analysis provided in Section Chapter 3.8 for this alternative for this resource.

4. CONSULTATION AND COORDINATION

The Endangered Species Act of 1973 (ESA) (16 U.S.C. §§ 1531 *et seq.*), as amended, establishes a national policy designed to protect and conserve threatened and endangered species and the ecosystems upon which they depend. BOEM and BSEE are currently in consultation with NMFS and FWS regarding the OCS oil and gas program in the GOM. BOEM is acting as the lead agency in the ongoing consultation, with BSEE's assistance and involvement. The programmatic consultation was expanded in scope after the reinitiation of consultation by BOEM following the *Deepwater Horizon* explosion and oil spill, and it will include both existing and future OCS oil and gas leases in the GOM over a ten year period. This consultation also considers any changes in baseline environmental conditions following the *Deepwater Horizon* explosion, oil spill, and response. The programmatic consultation will also include post lease activities associated with OCS oil and gas activities in the GOM, including G&G and decommissioning activities. While the programmatic Biological Opinion is in development, BOEM and NMFS have agreed to interim consultations on post lease approvals.

With consultation ongoing, BOEM and BSEE will continue to comply with all reasonable and prudent measures and the terms and conditions under the existing consultations, along with implementing the current BOEM- and BSEE-required mitigation, monitoring, and reporting requirements. Based on the most recent and best available information at the time, BOEM and BSEE will also continue to closely evaluate and assess risks to listed species and designated critical habitat in upcoming environmental compliance documentation under NEPA and other statutes.

In accordance with the National Historic Preservation Act (54 U.S.C. §§ 300101 *et seq.*), Federal agencies are required to consider the effects of their undertakings on historic properties. The implementing regulations for Section 106 of the National Historic Preservation Act, issued by the Advisory Council on

Historic Preservation (36 CFR § 800), specify the required review process. In accordance with 36 CFR § 800.8(c), BOEM intends to use the NEPA substitution process and documentation for preparing an EIS/ROD or an EA/FONSI to comply with Section 106 of the National Historic Preservation Act in lieu of 36 CFR §§ 800.3-800.6.

5. PUBLIC COMMENT

Once the operator's plan was deemed submitted (as per 30 CFR §550.231) on March 8, 2019, it was placed on <http://www.regulations.gov> for a 10-day public review. At the end of the comment period on March 18, 2019, no comments were received.

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7. PREPARERS

NEPA Coordinator

Denise G. Matherne Physical Scientist—NEPA Coordinator

Contributors

Scott Sorset	Marine Archaeologist—Archaeological Issues
Jose Hernandez	Physical Scientist—Air Quality Issues
Tre Glenn	Biologist—Marine Mammal and Sea Turtle Issues
Dave Moran	Biologist—Benthic Resources
Arie Kaller	Biologist—Essential Fish Habitat, Commercial Fishing and Fish Resources
Chris DuFore	Oceanographer—Water Quality Issues

Reviewers

Casey Rowe	Senior Environmental Scientist
Alvin Jones	Senior Technical Specialist

8. APPENDICES

Appendix A—Accidental Oil-Spill Discussion
<http://www.boem.gov/Appendix-A-Deepwater-SEA-Oil-Spill-Discussion/>