

UNITED STATES GOVERNMENT
MEMORANDUM

October 9, 2019

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

Subject: Public Information copy of plan

Control # - S-07970

Type - Supplemental Development Operations Coordinations Document

Lease(s) - OCS-G08735 Block - 106 West Delta Area
OCS-G08736 Block - 107 West Delta Area

Operator - Walter Oil & Gas Corporation

Description - Wells A001, A002, A003, A004, A005, A006, A007, A008, A009
and Platform A Complex ID# 24209

Rig Type - Jackup

Attached is a copy of the subject plan.

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

Chiquita Hill
Plan Coordinator

| Site Type/Name | Botm Lse/Area/Blk | Surface Location | Surf Lse/Area/Blk |
|----------------|-------------------|--------------------|-------------------|
| FIXED/A | | 3063 FSL, 5555 FEL | G08735/WD/106 |
| WELL/A001 | G08736/WD/107 | 3057 FSL, 5551 FEL | G08735/WD/106 |
| WELL/A002 | G08736/WD/107 | 3062 FSL, 5545 FEL | G08735/WD/106 |
| WELL/A003 | G08735/WD/106 | 3063 FSL, 5555 FEL | G08735/WD/106 |
| WELL/A004 | G08736/WD/107 | 3074 FSL, 5545 FEL | G08735/WD/106 |
| WELL/A005 | G08736/WD/107 | 3067 FSL, 4911 FWL | G08735/WD/106 |
| WELL/A006 | G08736/WD/107 | 3068 FSL, 4901 FWL | G08735/WD/106 |
| WELL/A007 | G08736/WD/107 | 3056 FSL, 4909 FWL | G08735/WD/106 |
| WELL/A008 | G08735/WD/106 | 3052 FSL, 5544 FEL | G08735/WD/106 |
| WELL/A009 | G08736/WD/107 | 3060 FSL, 4915 FWL | G08735/WD/106 |

PUBLIC COPY
August 13, 2019

SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT



West Delta Blocks 106 / 107
OCS-G 08735 / 08736

Estimated Startup Date: January 1, 2020

SUBMITTED BY:

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Suite 200
Houston, TX 77002

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TABLE OF CONTENTS

| | |
|---------------------------------------------------------------|----------|
| SECTION 1 PLAN CONTENTS | 1 |
| 1.1 PLAN INFORMATION | 1 |
| 1.2 LOCATION | 1 |
| 1.3 SAFETY AND POLLUTION PREVENTION FEATURES | 1 |
| 1.4 STORAGE TANKS AND PRODUCTION VESSELS | 2 |
| 1.5 POLLUTION PREVENTION MEASURES | 2 |
| 1.6 ADDITIONAL MEASURES | 2 |
| 1.7 COST RECOVERY FEE..... | 2 |
| SECTION 2 GENERAL INFORMATION | 3 |
| 2.1 APPLICATIONS AND PERMITS | 3 |
| 2.2 DRILLING FLUIDS | 3 |
| 2.3 PRODUCTION | 3 |
| 2.4 OIL CHARACTERISTICS | 3 |
| 2.5 NEW OR UNUSUAL TECHNOLOGY | 3 |
| 2.6 BONDING STATEMENT | 3 |
| 2.7 OIL SPILL FINANCIAL RESPONSIBILITY (OSFR) | 3 |
| 2.8 DEEPWATER WELL CONTROL STATEMENT..... | 4 |
| 2.9 SUSPENSION OF PRODUCTION | 4 |
| 2.10 BLOWOUT SCENARIO | 4 |
| SECTION 3 GEOLOGICAL AND GEOPHYSICAL INFORMATION | 5 |
| 3.1 GEOLOGICAL DESCRIPTION..... | 5 |
| 3.2 STRUCTURE CONTOUR MAPS..... | 5 |
| 3.3 INTERPRETED SEISMIC LINES | 5 |
| 3.4 GEOLOGICAL STRUCTURE CROSS-SECTION..... | 5 |
| 3.5 SHALLOW HAZARDS REPORT | 5 |
| 3.6 SHALLOW HAZARDS ASSESSMENT | 5 |
| 3.7 HIGH-RESOLUTION SEISMIC LINES | 5 |
| 3.8 STRATIGRAPHIC COLUMN | 5 |
| 3.9 TIME VS DEPTH TABLES..... | 5 |
| SECTION 4 HYDROGEN SULFIDE INFORMATION | 6 |

| | |
|------------------------------------------------------------------------------------------------|-----------|
| 4.1 CONCENTRATION | 6 |
| 4.2 CLASSIFICATION | 6 |
| 4.3 H ₂ S CONTINGENCY PLAN..... | 6 |
| 4.4 MODELING REPORT..... | 6 |
| SECTION 5 MINERAL RESOURCE CONSERVATION INFORMATION..... | 7 |
| 5.1 TECHNOLOGY & RESERVOIR ENGINEERING PRACTICES AND PROCEDURES | 7 |
| 5.2 TECHNOLOGY AND RECOVERY PRACTICES AND PROCEDURES..... | 7 |
| 5.3 RESERVOIR DEVELOPMENT..... | 7 |
| SECTION 6 BIOLOGICAL, PHYSICAL AND SOCIOECONOMIC INFORMATION..... | 8 |
| 6.1 DEEPWATER BENTHIC COMMUNITIES | 8 |
| 6.2 TOPOGRAPHIC FEATURES (BANKS)..... | 8 |
| 6.3 TOPOGRAPHIC FEATURES STATEMENT (SHUNTING)..... | 8 |
| 6.4 LIVE-BOTTOMS (PINNACLE TREND FEATURES) | 8 |
| 6.5 LIVE BOTTOMS (LOW RELIEF) | 8 |
| 6.6 POTENTIALLY SENSITIVE BIOLOGICAL FEATURES..... | 8 |
| 6.7 THREATENED AND ENDANGERED SPECIES, CRITICAL HABITAT AND MARINE MAMMAL INFORMATION | 8 |
| 6.8 ARCHAEOLOGICAL REPORT..... | 10 |
| 6.9 AIR AND WATER QUALITY INFORMATION | 10 |
| 6.10 SOCIOECONOMIC INFORMATION..... | 10 |
| SECTION 7 WASTES AND DISCHARGES INFORMATION..... | 11 |
| 7.1 PROJECTED GENERATED WASTES | 11 |
| 7.2 MODELING REPORT..... | 11 |
| SECTION 8 AIR EMISSIONS INFORMATION | 12 |
| 8.1 EMISSIONS WORKSHEETS AND SCREENING QUESTIONS | 12 |
| 8.2 SUMMARY INFORMATION | 12 |
| SECTION 9 OIL SPILL INFORMATION | 13 |
| 9.1 OIL SPILL RESPONSE PLANNING | 13 |
| 9.2 SPILL RESPONSE SITES..... | 13 |
| 9.3 OSRO INFORMATION | 13 |
| 9.4 WORST-CASE DISCHARGE SCENARIO DETERMINATION..... | 13 |
| 9.5 OIL SPILL RESPONSE DISCUSSION | 14 |
| 9.6 MODELING REPORT..... | 14 |

| | |
|-----------------------------------------------------------------------|-----------|
| SECTION 10 ENVIRONMENTAL MONITORING INFORMATION | 15 |
| 10.1 MONITORING SYSTEMS | 15 |
| 10.2 INCIDENTAL TAKES..... | 15 |
| 10.3 FLOWER GARDEN BANKS NATIONAL MARINE SANCTUARY | 15 |
| SECTION 11 LEASE STIPULATIONS INFORMATION | 16 |
| 11.1 PROTECTION OF ARCHAEOLOGICAL RESOURCES | 16 |
| 11.2 MARINE PROTECTED SPECIES | 16 |
| SECTION 12 ENVIRONMENTAL MITIGATION MEASURES INFORMATION | 18 |
| 12.1 MEASURES TAKEN TO AVOID, MINIMIZE, AND MITIGATE IMPACTS | 18 |
| 12.2 INCIDENTAL TAKES..... | 18 |
| SECTION 13 RELATED FACILITIES AND OPERATIONS INFORMATION | 19 |
| 13.1 RELATED OCS FACILITIES AND OPERATIONS | 19 |
| 13.2 TRANSPORTATION SYSTEM | 19 |
| 13.3 PRODUCED LIQUID HYDROCARBONS TRANSPORTATION VESSELS | 19 |
| SECTION 14 SUPPORT VESSELS AND AIRCRAFT INFORMATION | 20 |
| 14.1 GENERAL | 20 |
| 14.2 DIESEL OIL SUPPLY VESSELS | 20 |
| 14.4 SOLID AND LIQUID WASTE TRANSPORTATION | 20 |
| 14.5 VICINITY MAP..... | 20 |
| SECTION 15 ONSHORE SUPPORT FACILITIES INFORMATION | 21 |
| 15.1 GENERAL | 21 |
| 15.2 SUPPORT BASE CONSTRUCTION OR EXPANSION | 21 |
| 15.3 SUPPORT BASE CONSTRUCTION OR EXPANSION TIMETABLE | 21 |
| 15.4 WASTE DISPOSAL..... | 21 |
| SECTION 16 COASTAL ZONE MANAGEMENT (CZM) INFORMATION..... | 22 |
| SECTION 17 ENVIRONMENTAL IMPACT ANALYSIS (EIA)..... | 23 |
| SECTION 18 ADMINISTRATIVE INFORMATION | 24 |
| 18.1 EXEMPTED INFORMATION DESCRIPTION | 24 |
| 18.2 BIBLIOGRAPHY..... | 24 |

SECTION ATTACHMENTS

| | |
|-------------------|-----------------------------------------------------------------------------|
| Section 1 | Plan Contents |
| 1-A | OCS Plan Information Form |
| 1-B | Well Location Plat |
| 1-C | Pay.gov Receipt |
| Section 2 | General Information |
| 2-A | Blowout Assumptions |
| Section 7 | Wastes and Discharges Information |
| 7-A | Waste You Will Generate, Treat and Downhole Dispose or Discharge to the GOM |
| Section 8 | Air Emissions Information |
| 8-A | Emissions Worksheets |
| Section 9 | Oil Spill Information |
| 9-A | Oil Spill Response Discussion |
| Section 14 | Support Vessels and Aircraft Information |
| 14-A | Waste You Will Transport and/or Dispose Onshore Table |
| 14-B | Vicinity Map |
| Section 16 | Coastal Zone Management Act Information |
| 16-A | Coastal Zone Consistency Certification |
| Section 17 | Environmental Impact Analysis (EIA) |
| 17-A | Environmental Impact Analysis (EIA) |

SECTION 1 PLAN CONTENTS

1.1 PLAN INFORMATION

Walter Oil & Gas Corporation (Walter) established production from a common surface location at Platform A in West Delta Block 106 under DOCD Control No. N-4798, approved September 7, 1994, for Leases OCS-G 08735 and 08736, West Delta Blocks 106 and 107. To date, Well Nos. A001, A002, A003, A004, A005, A006 and A008 have been drilled and completed.

Under this Supplemental Development Operations Coordination Document, Walter proposes to drill, complete, test and produce two wells, A007 and A009. Further, Walter is providing for future miscellaneous well intervention activities for existing wells, A001, A002, A003, A004, A005, A006 and A008. These development operations are in approximately 250 feet of water. The wells will be drilled with a jackup MODU.

The OCS Plan Information Form BOEM-137 is included as **Attachment 1-A**.

1.2 LOCATION

A Well Location Plat depicting the surface locations of the proposed wells and water depths is included as **Attachment 1-B**. No anchors are associated with the activities proposed in this plan.

1.3 SAFETY AND POLLUTION PREVENTION FEATURES

A description of the drilling unit which complies with all relevant regulations is included on the OCS Plan Information Form. Rig specifications will be made part of each Application for Permit to Drill.

The rig will be equipped with safety and fire-fighting equipment required to comply with United States Coast Guard (USCG) regulations. Appropriate lifesaving equipment such as life rafts, life jackets, ring buoys, etc. as prescribed by the USCG, will be maintained on the rig at all times.

Safety features on the drilling unit will include well control, pollution prevention, and blowout prevention equipment as described in BSEE regulations 30 CFR 250 C, D, E, O, Q and S; and as further clarified by BSEE Notices to Lessees, and current policy making invoked by the BSEE, Environmental Protection Agency (EPA) and the USCG.

Pollution prevention measures include installation of curbs, gutters, drip pans, and drains on drilling deck areas to collect all contaminants and debris. Compliance will be maintained with the EPA NPDES Permit. The rig will be monitored daily and any waste or fuel resulting in pollution of the Gulf waters will be reported to the representative in charge for immediate isolation and correction of the problem. All spills will be reported to the appropriate governmental agencies.

1.4 STORAGE TANKS AND PRODUCTION VESSELS

The table below provides storage tanks with capacity of 25 barrels or more that will store fuels, oil and lubricants.

| Type of Storage Tank | Type of Facility | Tank Capacity (bbl) | Number of Tanks | Total Capacity (bbl) | Fluid Gravity (API) |
|--------------------------|------------------|---------------------|-----------------|----------------------|---------------------|
| Fuel oil (marine diesel) | Jack-up | 2,270 | 1 | 2,270 | 32.4° |
| Production | Platform | 250 | 2 | 500 | 38° |

1.5 POLLUTION PREVENTION MEASURES

These operations do not propose activities for which the State of Florida is an affected state.

1.6 ADDITIONAL MEASURES

Walter does not propose any additional safety, pollution prevention, or early spill detection measures beyond those required by 30 CFR Part 250.

1.7 COST RECOVERY FEE

Documentation of the \$8,476 cost recovery fee payment is included as **Attachment 1-C**.

U.S. Department of the Interior
Bureau of Ocean Energy Management

OMB Control Number: 1010-0151
OMB Approval Expires: 6/30/2021

OCS PLAN INFORMATION FORM

| General Information | | | | | | | | | | | | | | |
|---------------------------------------------------------------------------------------------------|--------------------|-----------------------|--------------------------|--------------------------------|----------------------------|-----------------------------------------------------|------------|------------------|-------------------------------|-----------------------------------------|----------------------------|----|--|--|
| Type of OCS Plan: | | Exploration Plan (EP) | | X | | Development Operations Coordination Document (DOCD) | | | | | | | | |
| Company Name: Walter Oil & Gas Corporation | | | | | | BOEM Operator Number: 00730 | | | | | | | | |
| Address: 1100 Louisiana, Suite 200 | | | | | | Contact Person: Dena Rodriguez | | | | | | | | |
| Houston, TX 77002 | | | | | | Phone Number: 281-578-3388 | | | | | | | | |
| | | | | | | E-Mail Address: dena.rodriguez@jccteam.com | | | | | | | | |
| If a service fee is required under 30 CFR 550.125(a), provide the | | | | Amount paid | | \$8,476.00 | | Receipt No. | | 26JC5J10 | | | | |
| Project and Worst Case Discharge (WCD) Information | | | | | | | | | | | | | | |
| Leases: OCS-G 08735 | | | Area: West Delta | | | Block: 106 | | | Project Name (If Applicable): | | | | | |
| Objectives: | | X | Oil | X | Gas | | Sulphur | | Salt | Onshore Support Base: Golden Meadow, LA | | | | |
| Platform / Well Name: A007 | | | | Total Volume of WCD: 5,646,480 | | | | API Gravity: 38° | | | | | | |
| Distance to Closest Land (Miles): 10.6 | | | | | | Volume from uncontrolled blowout: 94,108 bbls/day | | | | | | | | |
| Have you previously provided information to verify the calculations and assumptions for your WCD? | | | | | | | | | | Yes | X | No | | |
| If so, provide the Control Number of the EP or DOCD with which this information was provided | | | | | | | | | | | | | | |
| Do you propose to use new or unusual technology to conduct your activities? | | | | | | | | | | Yes | X | No | | |
| Do you propose to use a vessel with anchors to install or modify a structure? | | | | | | | | | | Yes | X | No | | |
| Do you propose any facility that will serve as a host facility for deepwater subsea development? | | | | | | | | | | Yes | X | No | | |
| Description of Proposed Activities and Tentative Schedule (Mark all that apply) | | | | | | | | | | | | | | |
| Proposed Activity | | | | Start Date | | | End Date | | | No. of Days | | | | |
| Future Intervention Activities – Wells A001, A002, A003, A004, A005, A006, A008 | | | | 10/15/2019 | | | 12/31/2019 | | | 78 | | | | |
| Drill, Complete, Test, Commence Production – Well No. A007 | | | | 01/01/2020 | | | 04/15/2020 | | | 106 | | | | |
| Production – Well No. A007 | | | | 04/16/2020 | | | 04/16/2030 | | | 10 years reserve life | | | | |
| Drill, Complete, Test, Commence Production – Well No. A009 | | | | 04/17/2020 | | | 07/31/2020 | | | 106 | | | | |
| Production – Well No. A009 | | | | 08/01/2020 | | | 08/01/2030 | | | 10 years reserve life | | | | |
| Future Intervention Activities – Wells A001, A002, A003, A004, A005, A006, A007, A008, A009 | | | | 01/01/2021 | | | 12/31/2030 | | | 150 | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| Description of Drilling Rig | | | | | | Description of Structure | | | | | | | | |
| X | Jackup | | | | Drillship | | | | Caisson | | Tension leg platform | | | |
| | Gorilla Jackup | | | | Platform rig | | X | Fixed platform | | Compliant tower | | | | |
| | Semisubmersible | | | | Submersible | | | | Spar | | Guyed tower | | | |
| | DP Semisubmersible | | | | Other (Attach description) | | | | Floating production system | | Other (Attach description) | | | |
| Drilling Rig Name (If known): | | | | | | | | | | | | | | |
| Description of Lease Term Pipelines | | | | | | | | | | | | | | |
| From (Facility/Area/Block) | | | To (Facility/Area/Block) | | | Diameter (Inches) | | | Length (Feet) | | | | | |
| N/A | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |

Form BOEM- 0137 (June 2018 – Supersedes all previous editions of this form which may not be used.)

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

| Proposed Well/Structure Location | | | | | | | | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------|--------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------|-------------|----|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A | | | | Previously reviewed under an approved EP or DOCD? | | X | Yes | | No |
| Is this an existing well or structure? | | X | Yes | No | If this is an existing well or structure, list the Complex ID or API No. | | 24209 | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | | | OCS OCS | | | |
| Area Name | West Delta | | | | | | | | |
| Block No. | 106 | | | | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,063' FSL | | | N/S Departure: | | N/S Departure | | F __ L | |
| | E/W Departure: 5,555' FEL | | | E/W Departure: | | N/S Departure | | F __ L | |
| Lambert X-Y coordinates | X: 2,568,572.93 | | | X: | | X: | | F __ L | |
| | Y: 64,370.90 | | | Y: | | Y: | | F __ L | |
| Latitude/ Longitude | Latitude: 28° 49' 53.616" N | | | Latitude: | | Latitude | | F __ L | |
| | Longitude: 89° 33' 28.2168" W | | | Longitude: | | Longitude | | F __ L | |
| Water Depth (Feet): 252' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): | |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | |
| N/A | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------|--------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------|-------------------------------------------|----|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A001 | | | | Previously reviewed under an approved EP or DOCD? | | X | Yes | | No |
| Is this an existing well or structure? | | X | Yes | No | If this is an existing well or structure, list the Complex ID or API No. | | 17-719-40589-00 | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08736 | | OCS OCS | | | |
| Area Name | West Delta | | | West Delta | | | | | |
| Block No. | 106 | | | 107 | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,057' FSL | | | N/S Departure: | | N/S Departure | | F __ L | |
| | E/W Departure: 5,551' FEL | | | E/W Departure: | | E/W Departure | | F __ L | |
| Lambert X-Y coordinates | X: 2,568,576.93 | | | X: | | X: | | X: | |
| | Y: 64,364.9 | | | Y: | | Y: | | Y: | |
| Latitude/ Longitude | Latitude: 28° 49' 53.5548" N | | | Latitude: | | Latitude | | Latitude | |
| | Longitude: 89° 33' 28.1736" W | | | Longitude: | | Longitude | | Longitude | |
| Water Depth (Feet): 250' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): MD (Feet): MD (Feet): | |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | TVD (Feet): TVD (Feet): TVD (Feet): | |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | |
| N/A | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------|--------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------|-------------------------------------------|----|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A002 | | | | Previously reviewed under an approved EP or DOCD? | | X | Yes | | No |
| Is this an existing well or structure? | | X | Yes | No | If this is an existing well or structure, list the Complex ID or API No. | | 17-719-40580-00 | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08736 | | OCS-G 08735 | | | |
| Area Name | West Delta | | | West Delta | | West Delta | | | |
| Block No. | 106 | | | 107 | | 106 | | | |
| Blockline Departures (in feet) | N/S Departure: 3,062' FSL | | | N/S Departure: | | N/S Departure: 3,057' FSL | | | |
| | E/W Departure: 5,545' FEL | | | E/W Departure: | | E/W Departure: 5,551' FEL | | | |
| Lambert X-Y coordinates | X: 2,568,582.93 | | | X: | | X: 2,568,576.93 | | | |
| | Y: 64,369.9 | | | Y: | | Y: 64,364.9 | | | |
| Latitude/ Longitude | Latitude: 28° 49' 53.6052" N | | | Latitude: | | Latitude: 28° 49' 53.5548" N | | | |
| | Longitude: 89° 33' 28.1052" W | | | Longitude: | | Longitude: 89° 33' 28.1736" W | | | |
| Water Depth (Feet): 250' | | | | MD (Feet): | | MD (Feet): | | Water Depth (Feet): 250' | |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | TVD (Feet): TVD (Feet): TVD (Feet): | |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | |
| N/A | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | |
|-----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|--------------|---------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------|-------------|----|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A003 | | | | Previously reviewed under an approved EP or DOCD? | | X | Yes | | No |
| Is this an existing well or structure? | | X | Yes | No | If this is an existing well or structure, list the Complex ID or API No. | | 17-719-40591-00 | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08735 | | OCS OCS | | | |
| Area Name | West Delta | | | West Delta | | | | | |
| Block No. | 106 | | | 106 | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,063' FSL | | | N/S Departure: | | N/S Departure | | F __ L | |
| | E/W Departure: 5,555' FEL | | | E/W Departure: | | E/W Departure | | F __ L | |
| Lambert X-Y coordinates | X: 2,568,572.93 | | | X: | | X: | | X: | |
| | Y: 64,370.9 | | | Y: | | Y: | | Y: | |
| Latitude/ Longitude | Latitude: 28° 49' 53.616" N | | | Latitude: | | Latitude | | Latitude | |
| | Longitude: 89° 33' 28.2168" W | | | Longitude: | | Longitude | | Longitude | |
| Water Depth (Feet): 250' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): | |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | |
| N/A | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | |
|-----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|--------------|---------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------|-------------|----|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A004 | | | | Previously reviewed under an approved EP or DOCD? | | X | Yes | | No |
| Is this an existing well or structure? | | X | Yes | No | If this is an existing well or structure, list the Complex ID or API No. | | 17-719-40603-00 | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08736 | | OCS OCS | | | |
| Area Name | West Delta | | | West Delta | | | | | |
| Block No. | 106 | | | 107 | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,074' FSL | | | N/S Departure: | | N/S Departure | | F __ L | |
| | E/W Departure: 5,545' FEL | | | E/W Departure: | | E/W Departure | | F __ L | |
| Lambert X-Y coordinates | X: 2,568,582.93 | | | X: | | X: | | X: | |
| | Y: 64,381.9 | | | Y: | | Y: | | Y: | |
| Latitude/ Longitude | Latitude: 28° 49' 53.724" N | | | Latitude: | | Latitude | | Latitude | |
| | Longitude: 89° 33' 28.1016" W | | | Longitude: | | Longitude | | Longitude | |
| Water Depth (Feet): 250' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): | |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | |
| N/A | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------|--------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------|-------------|----|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A005 | | | | Previously reviewed under an approved EP or DOCD? | | X | Yes | | No |
| Is this an existing well or structure? | | X | Yes | No | If this is an existing well or structure, list the Complex ID or API No. | | 17-719-40610-01 | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08736 | | OCS OCS | | | |
| Area Name | West Delta | | | West Delta | | | | | |
| Block No. | 106 | | | 107 | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,067' FSL | | | N/S Departure: | | N/S Departure | | F __ L | |
| | E/W Departure: 4,911' FWL | | | E/W Departure: | | E/W Departure | | F __ L | |
| Lambert X-Y coordinates | X: 2,568,588.93 | | | X: | | X: | | X: | |
| | Y: 64,374.9 | | | Y: | | Y: | | Y: | |
| Latitude/ Longitude | Latitude: 28° 49' 53.6484" N | | | Latitude: | | Latitude | | Latitude | |
| | Longitude: 89° 33' 28.0368" W | | | Longitude: | | Longitude | | Longitude | |
| Water Depth (Feet): 250' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): | |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | |
| N/A | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------|--------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------|-------------|----|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A006 | | | | Previously reviewed under an approved EP or DOCD? | | X | Yes | | No |
| Is this an existing well or structure? | | X | Yes | No | If this is an existing well or structure, list the Complex ID or API No. | | 17-719-40643-01 | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08736 | | OCS OCS | | | |
| Area Name | West Delta | | | West Delta | | | | | |
| Block No. | 106 | | | 107 | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,068' FSL | | | N/S Departure: | | N/S Departure | | F _ L | |
| | E/W Departure: 4,901' FWL | | | E/W Departure: | | E/W Departure | | F _ L | |
| Lambert X-Y coordinates | X: 2,568,578.93 | | | X: | | X: | | X: | |
| | Y: 64,375.9 | | | Y: | | Y: | | Y: | |
| Latitude/ Longitude | Latitude: 28° 49' 53.6628" N | | | Latitude: | | Latitude | | Latitude | |
| | Longitude: 89° 33' 28.1556" W | | | Longitude: | | Longitude | | Longitude | |
| Water Depth (Feet): 252' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): | |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | |
| N/A | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------|--------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|-------------|--------------------------------------------------------------------|------------|-----------|-------------|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A007 | | | | Previously reviewed under an approved EP or DOCD? | | | Yes | X | No | |
| Is this an existing well or structure? | | Yes | X | No | If this is an existing well or structure, list the Complex ID or API No. | | | | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | Yes | X | No | | |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08736 | | | OCS OCS | | | |
| Area Name | West Delta | | | West Delta | | | | | | |
| Block No. | 106 | | | 107 | | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,056.02' FSL | | | N/S Departure: | | | N/S Departure | | F __ L | |
| | E/W Departure: 4,909.78' FWL | | | E/W Departure: | | | E/W Departure | | F __ L | |
| Lambert X-Y coordinates | X: 2,568,587.72 | | | X: | | | X: | | X: | |
| | Y: 64,363.92 | | | Y: | | | Y: | | Y: | |
| Latitude/ Longitude | Latitude: 28° 49' 53.5440" N | | | Latitude: | | | Latitude | | Latitude | |
| | Longitude: 89° 33' 28.0527" W | | | Longitude: | | | Longitude | | Longitude | |
| Water Depth (Feet): 250' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): | | TVD (Feet): |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | MD (Feet): | | TVD (Feet): |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | | |
| N/A | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------|--------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------|-------------|----|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A008 | | | | Previously reviewed under an approved EP or DOCD? | | X | Yes | | No |
| Is this an existing well or structure? | | X | Yes | No | If this is an existing well or structure, list the Complex ID or API No. | | 17-719-40679-01 | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08735 | | OCS OCS | | | |
| Area Name | West Delta | | | West Delta | | | | | |
| Block No. | 106 | | | 106 | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,052' FSL | | | N/S Departure: | | N/S Departure | | F _ L | |
| | E/W Departure: 5,544' FEL | | | E/W Departure: | | E/W Departure | | F _ L | |
| Lambert X-Y coordinates | X: 2,568,583.93 | | | X: | | X: | | X: | |
| | Y: 64,359.9 | | | Y: | | Y: | | Y: | |
| Latitude/ Longitude | Latitude: 28° 49' 53.5044" N | | | Latitude: | | Latitude | | Latitude | |
| | Longitude: 89° 33' 28.0944" W | | | Longitude: | | Longitude | | Longitude | |
| Water Depth (Feet): 250' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): | |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| | | | | | | | | TVD (Feet): | |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | |
| N/A | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |
| | | | X: | | Y: | | | | |

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

| Proposed Well/Structure Location | | | | | | | | | | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------|--------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|-------------|--------------------------------------------------------------------|------------|-----------|-------------|
| Well or Structure Name/Number (If renaming well or structure, reference previous name): A009 | | | | Previously reviewed under an approved EP or DOCD? | | | Yes | X | No | |
| Is this an existing well or structure? | | Yes | X | No | If this is an existing well or structure, list the Complex ID or API No. | | | | | |
| Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities? | | | | | | | Yes | X | No | |
| WCD Info | For wells, volume of uncontrolled blowout (Bbls/Day): 94,108 | | | For structures, volume of all storage and pipelines (Bbls): 850 | | | API Gravity of fluid | | 38° | |
| | Surface Location | | | Bottom-Hole Location (For Wells) | | | Completion (For multiple completions, enter separate lines) | | | |
| Lease No. | OCS-G 08735 | | | OCS-G 08736 | | | OCS OCS | | | |
| Area Name | West Delta | | | West Delta | | | | | | |
| Block No. | 106 | | | 107 | | | | | | |
| Blockline Departures (in feet) | N/S Departure: 3,060.63' FSL | | | N/S Departure: | | | N/S Departure | | F __ L | |
| | E/W Departure: 4,915.7' FWL | | | E/W Departure: | | | E/W Departure | | F __ L | |
| Lambert X-Y coordinates | X: 2,568,593.63 | | | X: | | | X: | | X: | |
| | Y: 64,368.53 | | | Y: | | | Y: | | Y: | |
| Latitude/ Longitude | Latitude: 28° 49' 53.5888" N | | | Latitude: | | | Latitude | | Latitude | |
| | Longitude: 89° 33' 27.9855" W | | | Longitude: | | | Longitude | | Longitude | |
| Water Depth (Feet): 250' | | | | MD (Feet): | | TVD (Feet): | | MD (Feet): | | TVD (Feet): |
| Anchor Radius (if applicable) in feet: N/A | | | | | | | | MD (Feet): | | TVD (Feet): |
| Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary) | | | | | | | | | | |
| Anchor Name or No. | Area | Block | X Coordinate | | Y Coordinate | | Length of Anchor Chain on Seafloor | | | |
| N/A | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |
| | | | X: | | Y: | | | | | |

| PROPOSED LOCATIONS NAD27 LOUISIANA SOUTH | | | | | | | |
|---------------------------------------------|--------------|--------------|---------------|--------------|-----------------|-----------------|------|
| LOCATION | CALLNS | CALLEW | X COORDINATE | Y COORDINATE | LATITUDE | LONGITUDE | WD |
| Structure "A" | 3033.58' FSL | 4898.31' FWL | 2,568,576.24' | 64,341.48' | 28°49'53.3236"N | 89°33'28.1856"W | 250' |
| Well A7 Cond F | 3056.02' FSL | 4909.78' FWL | 2,568,587.72' | 64,363.92' | 28°49'53.5440"N | 89°33'28.0527"W | 250' |
| Well A9 Cond C | 3060.63' FSL | 4915.70' FWL | 2,568,593.63' | 64,368.53' | 28°49'53.5888"N | 89°33'27.9855"W | 250' |



2 SS4

Q 2

Q 1

WD106
OCS-G-08735
Walter

1 Q 2

A9
A7

3 Q

WD107
OCS-G-08736
Walter

Q 1

1 Q

WD112

1 Q

OCS-G-15645
Walter

1

WD111
OCS-G-15646
Walter



WALTER OIL & GAS CORPORATION

**SUPPLEMENTAL DEVELOPMENT OPERATIONS
COORDINATION DOCUMENT**

OCS-G-08736 BLOCK 107
WEST DELTA AREA
GULF OF MEXICO

Geodetic Datum: NAD27
Projection: LOUISIANA SOUTH
Grid Units: US SURVEY FEET

SCALE 0 2000
1:24000 FEET



FUGRO USA MARINE, INC.
6100 Hillcroft Ave.
Houston, Texas 77081
(713) 346-3700

**PUBLIC
INFORMATION**

Job No.: 19010697 Date: 7/24/2019 Drwn: MM
DWG File: 1901069701_WD106-107_A7-A9_SDOCD_G08736

Chart: 1 Of: 1
7/24/2019

ATTACHMENT 1 - C

From: notification@pay.gov
To: [Paul Rodriguez](#)
Subject: Pay.gov Payment Confirmation: BOEM Development/DOCD Plan - BD
Date: Thursday, August 08, 2019 9:52:40 AM



An official email of the United States government

Pay.gov logo



Your payment has been submitted to [Pay.gov](#) and the details are below. If you have any questions regarding this payment, please contact Brenda Dickerson at (703) 787-1617 or BseeFinanceAccountsReceivable@bsee.gov.

Application Name: BOEM Development/DOCD Plan - BD

[Pay.gov](#) Tracking ID: 26JC5J10

Agency Tracking ID: 75812244038

Transaction Type: Sale

Transaction Date: 08/08/2019 10:52:33 AM EDT

Account Holder Name: Brenda Roliard

Transaction Amount: \$8,476.00

Card Type: AmericanExpress

Card Number: *****1073

Region: Gulf of Mexico

Contact: Paul Rodriguez 713-659-1222

Company Name/No: Walter Oil & Gas Corporation, 00730

Lease Number(s): 08736, , , ,

Area-Block: West Delta WD, 107: , : , : , : ,

Type-Wells: Supplemental Plan, 2

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



[Pay.gov](#) is a program of the U.S. Department of the Treasury, Bureau of the Fiscal Service

SECTION 2 GENERAL INFORMATION

2.1 APPLICATIONS AND PERMITS

The table below provides the additional applications to be filed covering operations proposed in this DOCD.

| Application/Permit | Issuing Agency | Status |
|--------------------|----------------|-----------------|
| APD | BSEE | To Be Submitted |
| APM | BSEE | To Be Submitted |

2.2 DRILLING FLUIDS

The table below provides the types and estimated volumes of the drilling fluids Walter plans to use to drill the proposed wells.

| Type of Drilling Fluid | Estimated Volume of Drilling Fluid to be Used per Well (bbl) |
|--------------------------------------------|--------------------------------------------------------------|
| Water-based (seawater, freshwater, barite) | 8,000 |
| Oil-based (diesel, mineral oil) | N/A |
| Synthetic-based (internal olefin, ester) | 3,350 |

2.3 PRODUCTION

Proprietary Information

2.4 OIL CHARACTERISTICS

Oil characteristics are not required to be submitted with this plan.

2.5 NEW OR UNUSUAL TECHNOLOGY

No new or unusual technology is proposed in this DOCD as defined by 30 CFR 550.200.

2.6 BONDING STATEMENT

The bond requirements for the activities and facilities proposed in this DOCD are satisfied by an area-wide bond, furnished and maintained according to 30 CFR 556.900 (a) and 30 CFR 556.901 (a) and (b) and NTL No. 2015-BOEM-N04, "General Financial Assurance"; and additional security under 30 CFR 556.901(d) – (f) and NTL No. 2016—BOEM-N01, "Requiring Additional Security" as required by BOEM.

2.7 OIL SPILL FINANCIAL RESPONSIBILITY (OSFR)

Walter Oil & Gas Corporation (Company No. 00730) has demonstrated oil spill financial responsibility for the facilities proposed in this DOCD according to 30 CFR Part 553.15 (a); and NTL No. 2008-N05, "Guidelines for Oil Spill Financial Responsibility for Covered Facilities".

2.8 DEEPWATER WELL CONTROL STATEMENT

Operations proposed in this plan are located in water depths less than 300 meters (984 feet); therefore, a deepwater well control statement is not provided.

2.9 SUSPENSION OF PRODUCTION

Walter does not anticipate filing any requests for Suspension of Production to hold the leases addressed in this DOCD in active status.

2.10 BLOWOUT SCENARIO

In accordance with the requirements outlined in NTL No. 2015-BOEM-N01, "Information Requirements for Exploration Plans, Development and Production Plans, and Development Operations Coordination Documents on the OCS for Worst Case Discharge and Blowout Scenarios," the Blowout Scenario is included as **Attachment 2-A**.

ATTACHMENT 2 - A

SUPPLEMENTAL DOCD OCS-G 08736, WEST DELTA BLOCK 107 WELL NO. A007ST00BP00 BLOWOUT SCENARIO DATA SUBMITTAL NTL 2015-N01

There are currently five Jack-Up drilling rigs with 10,000 psi blowout preventers with derrick capacity and horsepower available for relief-well drilling in case the Jack-Up rig has a blowout. It is estimated that a contract could be administered and additional equipment procured to drill the relief well in sixty (60) days. Availability and safety record will be the predominant factors for selecting the rig for the relief well.

Measure to prevent Blowout:

This well is a development well to be drilled with a Jack-Up drilling rig next to the platform. The pressures, mud weights and casing points were determined from the data acquired while drilling the discovery well and the development wells.

Uncontrolled blowout volume (first day in bbls):

94,108

Duration of flow (days) based on relief well:

60

Total volume of spill (bbls (flow rate X duration):

5,646,480

Discussion of potential for well to bridge over (include backup to support your assumption):

Walter does not have sufficient information to anticipate that this well would likely bridge over; therefore, discussion of the likelihood of the well to bridge over is not included in this plan. Walter does not have any empirical data.

Discussion of likelihood of surface intervention to stop blowout:

An ongoing operation for surface intervention will work in parallel to the relief well operations. "Well Control" experts will board the rig, provide there is sufficient safety, to review the possibility of surface containment; or coordinate with relief well operations to contain the blowout. Firefighting boats and derrick barges will be employed to control the heat/fire and strip away surface equipment that prohibit successful surface intervention. A capping stack/diverter arrangement could potentially be used provided wellbore/casing integrity is verified during the operation.

RELIEF WELL

Rig type capable of drilling relief well at WD and to TD:

Jack-Up drilling rig

Rig package constraints (if none, make statement to that effect):

No constraints

Time to acquire rig (days):

7

Time to move a rig onsite (days):

7

**REVISED DOCD
OCS-G 08736, WEST DELTA BLOCK 107
WELL NO. A007ST00BP00
BLOWOUT SCENARIO DATA SUBMITTAL
NTL 2015-N01
Page 2**

Drilling time (days):

46

Statement whether possibility of using nearby platform was considered:

Use of a nearby platform is not feasible due to location and platform infrastructure in the area.

Additional precautions and safety procedures:

1. Complete detailed well design program for drilling operations including mud program and cement program. Safety meeting will be conducted every tour to communicate importance of operations.
2. Maintain mud properties consistent with offset wells.
3. Provide flow monitoring equipment for the rig's mud return system with real time data provided to supervisory personnel.
4. Utilize real-time gas monitoring for the purpose of measuring gas units contained in the mud system for supervisory personnel.
5. Monitor drilling breaks and check for flow. In the event of flow, mud weight will be increased to control the well.
6. Monitor trip volumes both pulling in and out of the hole. Proper fill up volumes will be measured.
7. Control surge and swab pressures.
8. Circulate bottoms up before trips to insure the well is stable and free of gas.
9. Test BOPs at a minimum of every two weeks when rams are changed or BOPs repaired.

Measures to reduce the likelihood of a blowout:

1. Contractor personnel (driller and tool pusher) have the authority to shut well(s) in should a well flow be encountered. Company personnel will be informed of the situation.
2. Company personnel will go to the floor immediately to assist Contractor personnel in industry-best practices kill procedure.
3. Proper API casing design and cementing practices using centralizers as recommended by simulation to insure centralized casing and 360 degree annular fill up of cement.
4. Production casing will have two barriers (float collar and float shoe).
5. Upon bumping the plug in cement operations, floats will be checked. In the event the floats do not hold, pressure will be maintained for 6-8 hours, and then shoe tract will be rechecked. Remedial cementing or setting of bridge plug will be taken if necessary to isolate the shoe tract.
6. Run cement bond log to verify cement quality before displacing well with completion fluid.

Arrangements for drilling relief wells:

1. Review shallow hazards survey to determine positioning of relief well.
2. Contract and mobilize relief well rig.
3. Contract relief well directional drilling company and relief well drilling experts.
4. Prepare drilling program based on optimum rig position relative to targeted wellbore to optimize intervention.

SECTION 3 GEOLOGICAL AND GEOPHYSICAL INFORMATION

3.1 GEOLOGICAL DESCRIPTION

Proprietary Information

3.2 STRUCTURE CONTOUR MAPS

Proprietary Information

3.3 INTERPRETED SEISMIC LINES

Proprietary Information

3.4 GEOLOGICAL STRUCTURE CROSS-SECTION

Proprietary Information

3.5 SHALLOW HAZARDS REPORT

The proposed operations will be conducted from a previously approved surface location as provided for in EP (Control No. N-4266); therefore, in accordance with NTL No. 2008-G05, "Shallow Hazards Program," a shallow hazards report is not provided.

3.6 SHALLOW HAZARDS ASSESSMENT

The proposed operations will be conducted from a previously approved surface location as provided for in EP (Control No. N-4266); therefore, in accordance with NTL No. 2008-G05, "Shallow Hazards Program," a site-specific shallow hazards assessment is not provided.

3.7 HIGH-RESOLUTION SEISMIC LINES

Proprietary Information

3.8 STRATIGRAPHIC COLUMN

Proprietary Information

3.9 TIME VS DEPTH TABLES

Proprietary Information

SECTION 4 HYDROGEN SULFIDE INFORMATION

4.1 CONCENTRATION

Walter anticipates encountering 0 ppm H₂S during the proposed operations.

4.2 CLASSIFICATION

In accordance with Title 30 CFR 250.490(c), Walter requests that the area of proposed operations be classified by the BOEM as H₂S absent.

4.3 H₂S CONTINGENCY PLAN

An H₂S Contingency Plan is not required for the activities proposed in this plan.

4.4 MODELING REPORT

Modeling reports are not required for the activities proposed in this plan.

SECTION 5 MINERAL RESOURCE CONSERVATION INFORMATION

5.1 TECHNOLOGY & RESERVOIR ENGINEERING PRACTICES AND PROCEDURES

Proprietary Information

5.2 TECHNOLOGY AND RECOVERY PRACTICES AND PROCEDURES

Proprietary Information

5.3 RESERVOIR DEVELOPMENT

Proprietary Information

SECTION 6

BIOLOGICAL, PHYSICAL AND SOCIOECONOMIC INFORMATION

6.1 DEEPWATER BENTHIC COMMUNITIES

Activities proposed in this DOCD are in water depths less than 300 meters (984 feet); therefore, information as outlined in Attachment A of NTL No. 2009-G40, "Deepwater Benthic Communities," is not provided.

6.2 TOPOGRAPHIC FEATURES (BANKS)

Activities proposed in this DOCD do not fall within 305 meters (1000 feet) of a topographic "No Activity Zone;" therefore, no map is required per NTL No. 2009-G39, "Biologically Sensitive Underwater Features and Areas."

6.3 TOPOGRAPHIC FEATURES STATEMENT (SHUNTING)

Activities proposed under this DOCD will be conducted outside all Topographic Feature Protective Zones; therefore, shunting of drill cuttings and drilling fluids is not required per NTL No. 2009-G39, "Biologically Sensitive Underwater Features and Areas."

6.4 LIVE-BOTTOMS (PINNACLE TREND FEATURES)

West Delta Block 106 is not located within 61 meters (200 feet) of any pinnacle trend feature; therefore, a separate bathymetric map is not required per NTL No. 2009-G39, "Biologically Sensitive Underwater Features and Areas."

6.5 LIVE BOTTOMS (LOW RELIEF)

West Delta Block 106 is not located within 30 meters (100 feet) of any live bottom (low relief) feature with vertical relief equal to or greater than 8 feet; therefore, live bottom (low relief) maps are not required per NTL No. 2009-G39, "Biologically Sensitive Underwater Features and Areas."

6.6 POTENTIALLY SENSITIVE BIOLOGICAL FEATURES

West Delta Block 106 is not located within 30 meters (100 feet) of potentially sensitive biological features. In accordance with NTL No. 2009-G39, "Biologically Sensitive Underwater Features and Areas," biologically sensitive area maps are not required.

6.7 THREATENED AND ENDANGERED SPECIES, CRITICAL HABITAT AND MARINE MAMMAL INFORMATION

The federally listed endangered and threatened species potentially occurring in the lease area and along the Gulf Coast are provided in the table below.

| Species | Scientific Name | Status | Potential Presence | | Critical Habitat Designated in the Gulf of Mexico |
|----------------------------------------------------------------|-----------------------------------------------------------------------|--------|--------------------|---------|------------------------------------------------------------------------|
| | | | Lease Area | Coastal | |
| Marine Mammals | | | | | |
| Manatee, West Indian | <i>Trichechus manatus latirostris</i> | E | -- | X | Florida (peninsular) |
| Whale, Blue | <i>Balaenoptera masculus</i> | E | X | -- | None |
| Whale, Bryde's | <i>Balaenoptera edeni</i> | E | X | -- | None |
| Whale, Finback | <i>Balaenoptera physalus</i> | E | X | -- | None |
| Whale, Humpback | <i>Megaptera novaeangliae</i> | E | X | -- | None |
| Whale, North Atlantic Right | <i>Eubalaena glacialis</i> | E | X | -- | None |
| Whale, Sei | <i>Balaenoptera borealis</i> | E | X | -- | None |
| Whale, Sperm | <i>Physeter catodon</i> (= <i>macrocephalus</i>) | E | X | -- | None |
| Terrestrial Mammals | | | | | |
| Mouse, Beach (Alabama, Choctawatchee, Perdido Key, St. Andrew) | <i>Peromyscus polionotus</i> | E | - | X | Alabama, Florida (panhandle) beaches |
| Birds | | | | | |
| Plover, Piping | <i>Charadrius melodus</i> | T | - | X | Coastal Texas, Louisiana, Mississippi, Alabama and Florida (panhandle) |
| Crane, Whooping | <i>Grus Americana</i> | E | - | X | Coastal Texas |
| Reptiles | | | | | |
| Sea Turtle, Green | <i>Chelonia mydas</i> | T | X | X | None |
| Sea Turtle, Hawksbill | <i>Eretmochelys imbricata</i> | E | X | X | None |
| Sea Turtle, Kemp's Ridley | <i>Lepidochelys kempli</i> | E | X | X | None |
| Sea Turtle, Leatherback | <i>Dermochelys coriacea</i> | E | X | X | None |
| Sea Turtle, Loggerhead | <i>Caretta caretta</i> | T | X | X | Texas, Louisiana, Mississippi, Alabama, Florida |
| Fish | | | | | |
| Sturgeon, Gulf | <i>Acipenser oxyrinchus</i> (= <i>oxyrhynchus</i>) <i>desotoi</i> | T | X | X | Coastal Louisiana, Mississippi, Alabama and Florida (panhandle) |
| Corals | | | | | |
| Coral, Elkhorn | <i>Acopora palmate</i> | T | - | X | Florida Keys and Dry Tortugas |
| Coral, Staghorn | <i>Acopora cervicornis</i> | T | - | X | Florida |

Abbreviations: E = Endangered; T = Threatened

* The Blue Fin, Humpback, North Atlantic Right, and Sei Whales are rare or extralimital in the Gulf of Mexico and are unlikely to be present in the lease area.

6.8 ARCHAEOLOGICAL REPORT

The proposed operations will be conducted from a previously approved surface location as provided for in EP (Control No. N-4266); therefore, in accordance with NTL No. 2005-G07, "Archaeological Resource Surveys and Reports," and NTL No. 2011-JOINT-G01, "Revisions to the List of OCS Lease Blocks Requiring Archaeological Resource Surveys and Reports," an archaeological resource survey report is not provided.

6.9 AIR AND WATER QUALITY INFORMATION

Air and water quality information is not required to be included in this plan per NTL No. 2008-G04, "Information Requirements for Exploration Plans and Development Operations Coordination Documents."

6.10 SOCIOECONOMIC INFORMATION

Socioeconomic information is not required to be included in this plan per NTL No. 2008-G04, "Information Requirements for Exploration Plans and Development Operations Coordination Documents."

SECTION 7 WASTES AND DISCHARGES INFORMATION

7.1 PROJECTED GENERATED WASTES

“Wastes You Will Generate, Treat and Downhole Dispose or Discharge to the Gulf of Mexico” is included as **Attachment 7-A**.

7.2 MODELING REPORT

Modeling reports are not required for the activities proposed in this plan.

ATTACHMENT 7-A

WASTES YOU WILL GENERATE, TREAT AND DOWNHOLE DISPOSE OR DISCHARGE TO THE GOM

please specify if the amount reported is a total or per well amount

| Projected generated waste | | | Projected ocean discharges | | Projected Downhole Disposal |
|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-------------------|--------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| Type of Waste | Composition | Projected Amount | Discharge rate | Discharge Method | Answer yes or no |
| Will drilling occur? If yes, you should list muds and cuttings | | | | | |
| Water-based drilling fluid | Water based drilling fluids | 4,406 bbls/well | 489 bbls / day | Discharge overboard | No |
| Cuttings wetted with water-based fluid | Cuttings generated while using water based drilling fluids | 1,953 bbls / well | 390 bbls/day/well including drilling fluid | Discharge overboard | No |
| Drill cuttings generated while using synthetic based drilling fluids | Cuttings generated while using synthetic based drilling fluids | 2,576 bbls/well | 22 bbls/day/well | Treated cuttings will be discharged overboard while drilling SBM interval. Cuttings will pass through cuttings dryer to reduce ROC percentage in compliance with EPA and then shunt through downpipe below water line. | No |
| Will humans be there? If yes, expect conventional waste | | | | | |
| Domestic waste | Gray Water | 8,000 bbls/total | 10 bbls/hr | Processed through DNV Class approved treatment tank and discharged | No |
| Sanitary waste | Human body treat waste discharged from toilets | 2,500 bbls total | 3 bbls/hr | Chlorinate and discharge overboard | No |
| Is there a deck? If yes, there will be Deck Drainage | | | | | |
| Deck Drainage | Rain water and rig wash | 28,000 bbls total | 15 bbls/hr /dependent on rainfall | Oily water is treated in one of four (4) separators and discharged through Port-side caisson (cuttings chute) below sea level | No |
| Will you conduct well treatment, completion, or workover? | | | | | |
| Well treatment fluids | Viscous and csg wash spacers using HEC and small amounts sodium | 200 bbls | 200 bbls/well | R-360 or Ecoserve, Fourchon, LA | No |
| Well completion fluids | Calcium Chloride | 500 bbls | 50 bbls/day | NA | No |
| Workover fluids | NA | NA | NA | NA | NA |
| Miscellaneous discharges. If yes, only fill in those associated with your activity. | | | | | |
| Desalinization unit discharge | NA | NA | NA | NA | No |
| Blowout prevent fluid | NA | NA | NA | NA | No |
| Ballast water | NA | NA | NA | NA | No |
| Bilge water | NA | NA | NA | NA | No |
| Excess cement at seafloor | NA | NA | NA | NA | No |
| Fire water | NA | NA | NA | NA | No |
| Cooling water | NA | NA | NA | NA | No |
| Will you produce hydrocarbons? If yes fill in for produced water. | | | | | |
| Produced water | Formation Water | 20,000 bbls | 833 bbls/hr | Discharge overboard | NA |
| Will you be covered by an individual or general NPDES permit? | | GMG 290129 | | | |
| NOTE: If you will not have a type of waste, enter NA in the row. | | | | | |

SECTION 8 AIR EMISSIONS INFORMATION

8.1 EMISSIONS WORKSHEETS AND SCREENING QUESTIONS

| Screen Questions for DOCD's | Yes | No |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|
| Is any calculated Complex Total (CT) Emission amount (tons) associated with your proposed development activities more than 90% of the amounts calculated using the following formulas: $CT = 3400D^{2/3}$ for CO, and $CT = 33.3D$ for the other air pollutants (where D = distance to shore in miles)? | X | |
| Do your emission calculations include any emission reduction measures or modified emission factors? | | X |
| Does or will the facility complex associated with your proposed development and production activities process production from eight or more wells? | X | |
| Do you expect to encounter H ₂ S at concentrations greater than 20 parts per million (ppm)? | | X |
| Do you propose to flare or vent natural gas for more than 48 continuous hours from any proposed well? | | X |
| Do you propose to burn produced hydrocarbon liquids? | | X |
| Are your proposed development and production activities located within 25 miles (40 kilometers) from shore? | X | |
| Are your proposed development and production activities located within 124 miles (200 kilometers) of the Breton Wilderness Area? | X | |

8.2 SUMMARY INFORMATION

There are existing facilities and activities co-located with the currently proposed activities; however, the Plan Emissions are the same as the Total Complex Emissions and are Included as **Attachment 8-A**.

This information was calculated by: Dena Rodriguez
(281) 578-3388
dena.rodriquez@jccteam.com

Air emissions were calculated using historical actual fuel usage for the MODU Ensco 75 with a 25% safety factor added.

DOCD AIR QUALITY SCREENING CHECKLIST

| | |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COMPANY | Walter Oil & Gas Corporation |
| AREA | West Delta |
| BLOCK | 106 |
| LEASE | OCS-G 08735 |
| PLATFORM | A |
| WELL | A001, A002, A003, A004, A005, A006, A007, A008, A009 |
| COMPANY CONTACT | Dena Rodriguez |
| TELEPHONE NO. | 281-578-3388 |
| REMARKS | Drill, complete, test, produce A007, A009; Production emissions include currently producing wells and proposed wells; Includes emissions for future activities on A001, A002, A003, A004, A005, A006, A007, A008, A009 including contingency drilling days each year for maintenance, workovers, recompletions, interventions and abandonment activities; Ensco 75 jackup historical fuel usage used |

| LEASE TERM PIPELINE CONSTRUCTION INFORMATION: | | |
|-----------------------------------------------|---------------------|-----------------------------------|
| YEAR | NUMBER OF PIPELINES | TOTAL NUMBER OF CONSTRUCTION DAYS |
| 2019 | N/A | |
| 2020 | N/A | |
| 2021 | N/A | |
| 2022 | N/A | |
| 2023 | N/A | |
| 2024 | N/A | |
| 2025 | N/A | |
| 2026 | N/A | |
| 2027 | N/A | |
| 2028 | N/A | |
| 2029 | N/A | |

AIR EMISSIONS COMPUTATION FACTORS

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

| Equipment/Emission Factors | units | PM | SOx | NOx | VOC | CO | REF. | DATE |
|----------------------------|--------------|-------|----------|------|--------|-------|------------------------|-------|
| NG Turbines | gms/hp-hr | | 0.00247 | 1.3 | 0.01 | 0.83 | AP42 3.2-1& 3.1-1 | 10/96 |
| NG 2-cycle lean | gms/hp-hr | | 0.00185 | 10.9 | 0.43 | 1.5 | AP42 3.2-1 | 10/96 |
| NG 4-cycle lean | gms/hp-hr | | 0.00185 | 11.8 | 0.72 | 1.6 | AP42 3.2-1 | 10/96 |
| NG 4-cycle rich | gms/hp-hr | | 0.00185 | 10 | 0.14 | 8.6 | AP42 3.2-1 | 10/96 |
| | | | | | | | | |
| Diesel Recip. < 600 hp. | gms/hp-hr | 1 | 0.005505 | 14 | 1.12 | 3.03 | AP42 3.3-1 | 10/96 |
| Diesel Recip. > 600 hp. | gms/hp-hr | 0.32 | 0.005505 | 11 | 0.33 | 2.4 | AP42 3.4-1 | 10/96 |
| Diesel Boiler | lbs/bbl | 0.084 | 0.009075 | 0.84 | 0.008 | 0.21 | AP42 1.3-12,14 | 9/98 |
| | | | | | | | | |
| NG Heaters/Boilers/Burners | lbs/mmscf | 7.6 | 0.593 | 100 | 5.5 | 84 | AP42 1.4-1, 14-2, & 14 | 7/98 |
| NG Flares | lbs/mmscf | | 0.593 | 71.4 | 60.3 | 388.5 | AP42 11.5-1 | 9/91 |
| Liquid Flaring | lbs/bbl | 0.42 | 6.83 | 2 | 0.01 | 0.21 | AP42 1.3-1 & 1.3-3 | 9/98 |
| Tank Vapors | lbs/bbl | | | | 0.03 | | E&P Forum | 1/93 |
| Fugitives | lbs/hr/comp. | | | | 0.0005 | | API Study | 12/93 |
| Glycol Dehydrator Vent | lbs/mmscf | | | | 6.6 | | La. DEQ | 1991 |
| Gas Venting | lbs/scf | | | | 0.0034 | | | |

| Sulphur Content Source | Value | Units |
|-------------------------------|--------|----------|
| Fuel Gas | 3.33 | ppm |
| Diesel Fuel | 0.0015 | % weight |
| Produced Gas(Flares) | 3.33 | ppm |
| Produced Oil (Liquid Flaring) | 1 | % weight |

AIR EMISSIONS CALCULATIONS - FIRST YEAR

| COMPANY | AREA | BLOCK | LEASE | PLATFORM | WELL | CONTACT | PHONE | REMARKS | | | | | | | | |
|----------------------------------|----------------------------------------|----------|-------------|-----------|------------------------------------------------|----------------|-------------------------|---------------------------------------------------------------------------------------------------------|---------------|--------------|---------------|----------------|---------------|---------------|---------------|-----------------|
| Walter Oil & Gas Corpora | West Delta | 106 | OCS-G 08735 | A | A001, A002, A003, A004, A005, A006, A007, A008 | Dena Rodriguez | 281-578-3388 | Drill, complete, test, produce A007, A009; Production emissions include currently producing wells and p | | | | | | | | |
| OPERATIONS | EQUIPMENT | RATING | MAX. FUEL | ACT. FUEL | RUN TIME | | MAXIMUM POUNDS PER HOUR | | | | | ESTIMATED TONS | | | | |
| | Diesel Engines | HP | GAL/HR | GAL/D | | | | | | | | | | | | |
| | Nat. Gas Engines | HP | SCF/HR | SCF/D | | | | | | | | | | | | |
| | Burners | MMBTU/HR | SCF/HR | SCF/D | HR/D | D/YR | PM | SOx | NOx | VOC | CO | PM | SOx | NOx | VOC | CO |
| DRILLING* | PRIME MOVER>600hp diesel | 7580 | 366.114 | 2653.75 | 16 | 78 | 5.34 | 0.09 | 183.66 | 5.51 | 40.07 | 1.01 | 0.02 | 34.61 | 1.04 | 7.55 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | BURNER diesel | 0 | | | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | AUXILIARY EQUIP<600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 2065 | 99.7395 | 2393.75 | 2 | 23 | 1.46 | 0.03 | 50.03 | 1.50 | 10.92 | 0.03 | 0.00 | 1.15 | 0.03 | 0.25 |
| | VESSELS>600hp diesel(supply) | 2065 | 99.7395 | 2393.75 | 2 | 12 | 1.46 | 0.03 | 50.03 | 1.50 | 10.92 | 0.02 | 0.00 | 0.60 | 0.02 | 0.13 |
| | VESSELS>600hp diesel(tugs) | 8400 | 405.72 | 9737.28 | 2 | 2 | 5.92 | 0.10 | 203.52 | 6.11 | 44.41 | 0.01 | 0.00 | 0.41 | 0.01 | 0.09 |
| PIPELINE INSTALLATION | PIPELINE LAY BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | SUPPORT VESSEL diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PIPELINE BURY BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | SUPPORT VESSEL diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(supply) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| FACILITY INSTALLATION | DERRICK BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | MATERIAL TUG diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(supply) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| PRODUCTION | RECIP.<600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Generator | RECIP.<600hp diesel | 460 | 22.218 | 533.23 | 12 | 365 | 1.01 | 0.01 | 14.19 | 1.13 | 3.07 | 2.22 | 0.01 | 31.07 | 2.49 | 6.72 |
| Generator | RECIP.<600hp diesel | 460 | 22.218 | 533.23 | 12 | 365 | 1.01 | 0.01 | 14.19 | 1.13 | 3.07 | 2.22 | 0.01 | 31.07 | 2.49 | 6.72 |
| | SUPPORT VESSEL diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | TURBINE nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | RECIP.2 cycle lean nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| Compressor | RECIP.4 cycle lean nat gas | 1400 | 10000.2 | 240004.80 | 24 | 365 | | 0.01 | 36.39 | 2.22 | 4.93 | | 0.03 | 159.38 | 9.72 | 21.61 |
| | RECIP.4 cycle rich nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | BURNER nat gas | 0 | 0.00 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | MISC. | BPD | SCF/HR | COUNT | | | | | | | | | | | | |
| | TANK- | 0 | | | 0 | 0 | | | | 0.00 | 0.00 | | | | 0.00 | 0.00 |
| | FLARE- | | 0 | | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | PROCESS VENT- | | 0 | | 0 | 0 | | | | 0.00 | 0.00 | | | | 0.00 | 0.00 |
| | FUGITIVES- | | | 500.0 | | 365 | | | | 0.25 | 0.00 | | | | 1.10 | 0.00 |
| | GLYCOL STILL VENT- | | 0 | | 0 | 0 | | | | 0.00 | 0.00 | | | | 0.00 | 0.00 |
| DRILLING WELL TEST | OIL BURN | 0 | | | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | GAS FLARE | | 0 | | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| 2019 YEAR TOTAL | | | | | | | 16.20 | 0.26 | 552.00 | 19.36 | 117.38 | 5.51 | 0.07 | 258.28 | 16.89 | 43.08 |
| EXEMPTION CALCULATION | DISTANCE FROM LAND IN MILES | | | | | | | | | | | 352.98 | 352.98 | 352.98 | 352.98 | 16406.51 |
| | 10.6 | | | | | | | | | | | | | | | |

* This AQR includes contingency drilling days each year for maintenance, workovers, recompletions, interventions and abandonment activities. Facility is within 100 km of Breton Sound, however contingency activity emissions will not occur for consecutive three years.

AIR EMISSIONS CALCULATIONS - SECOND YEAR

| COMPANY | AREA | BLOCK | LEASE | PLATFORM | WELL | CONTACT | PHONE | REMARKS | | | | | | | | |
|----------------------------------|----------------------------------------|------------|---------------|--------------|-----------------------------------------|----------------|-------------------------|---------------------------------------------------------------------------------------------------|---------------|--------------|---------------|----------------|---------------|---------------|---------------|-----------------|
| Walter Oil & Gas Corpor | West Delta | 106 | OCS-G 08735 | A | A001, A002, A003, A004, A005, A006, A00 | Dena Rodriguez | 281-578-3388 | Drill, complete, test, produce A007, A009; Production emissions include currently producing wells | | | | | | | | |
| OPERATIONS | EQUIPMENT | RATING | MAX. FUEL | ACT. FUEL | RUN TIME | | MAXIMUM POUNDS PER HOUR | | | | | ESTIMATED TONS | | | | |
| | Diesel Engines | HP | GAL/HR | GAL/D | | | | | | | | | | | | |
| | Nat. Gas Engines | HP | SCF/HR | SCF/D | | | | | | | | | | | | |
| | Burners | MMBTU/HR | 0 | SCF/D | HR/D | D/YR | PM | SOx | NOx | VOC | CO | PM | SOx | NOx | VOC | CO |
| DRILLING | PRIME MOVER>600hp diesel | 7580 | 366.114 | 2653.75 | 16 | 212 | 5.34 | 0.09 | 183.66 | 5.51 | 40.07 | 2.74 | 0.05 | 94.07 | 2.82 | 20.52 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | BURNER diesel | 0 | | | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | AUXILIARY EQUIP<600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 2065 | 99.7395 | 2393.75 | 2 | 61 | 1.46 | 0.03 | 50.03 | 1.50 | 10.92 | 0.09 | 0.00 | 3.05 | 0.09 | 0.67 |
| | VESSELS>600hp diesel(supply) | 2065 | 99.7395 | 2393.75 | 2 | 31 | 1.46 | 0.03 | 50.03 | 1.50 | 10.92 | 0.05 | 0.00 | 1.55 | 0.05 | 0.34 |
| | VESSELS>600hp diesel(tugs) | 8400 | 405.72 | 9737.28 | 2 | 2 | 5.92 | 0.10 | 203.52 | 6.11 | 44.41 | 0.01 | 0.00 | 0.41 | 0.01 | 0.09 |
| PIPELINE INSTALLATION | PIPELINE LAY BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | SUPPORT VESSEL diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PIPELINE BURY BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | SUPPORT VESSEL diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(supply) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| FACILITY INSTALLATION | DERRICK BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | MATERIAL TUG diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(supply) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| PRODUCTION | RECIP.<600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Generator | RECIP.<600hp diesel | 460 | 22.218 | 533.23 | 12 | 365 | 1.01 | 0.01 | 14.19 | 1.13 | 3.07 | 2.22 | 0.01 | 31.07 | 2.49 | 6.72 |
| Generator | RECIP.<600hp diesel | 460 | 22.218 | 533.23 | 12 | 365 | 1.01 | 0.01 | 14.19 | 1.13 | 3.07 | 2.22 | 0.01 | 31.07 | 2.49 | 6.72 |
| | SUPPORT VESSEL diesel | 2065 | 99.7395 | 2393.75 | 2 | 22 | 1.46 | 0.03 | 50.03 | 1.50 | 10.92 | 0.03 | 0.00 | 1.10 | 0.03 | 0.24 |
| | TURBINE nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | RECIP.2 cycle lean nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| Compressor | RECIP.4 cycle lean nat gas | 1400 | 10000.2 | 240004.80 | 24 | 365 | | 0.01 | 36.39 | 2.22 | 4.93 | | 0.03 | 159.38 | 9.72 | 21.61 |
| | RECIP.4 cycle rich nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | BURNER nat gas | 0 | 0.00 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | MISC. | BPD | SCF/HR | COUNT | | | | | | | | | | | | |
| | TANK- FLARE- | 0 | | | 0 | 0 | | | 0.00 | | 0.00 | | | 0.00 | | 0.00 |
| | PROCESS VENT- FUGITIVES- | | 0 | | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | GLYCOL STILL VENT- | | | 500.0 | | 365 | | | 0.25 | | 0.00 | | | 1.10 | | 0.00 |
| | | | 0 | | 0 | 0 | | | 0.00 | | 0.00 | | | 0.00 | | 0.00 |
| DRILLING WELL TEST | OIL BURN | 0 | | | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | GAS FLARE | | 208333.3 | | 24 | 4 | | 0.12 | 14.87 | 12.56 | 80.94 | | 0.01 | 0.71 | 0.60 | 3.88 |
| 2020 YEAR TOTAL | | | | | | | 17.66 | 0.41 | 616.91 | 33.42 | 209.24 | 7.35 | 0.11 | 322.41 | 19.40 | 60.80 |
| EXEMPTION CALCULATION | DISTANCE FROM LAND IN MILES | | | | | | | | | | | 352.98 | 352.98 | 352.98 | 352.98 | 16406.51 |
| | 10.6 | | | | | | | | | | | | | | | |

AIR EMISSIONS CALCULATIONS - THIRD YEAR

| COMPANY | AREA | BLOCK | LEASE | PLATFORM | WELL | CONTACT | PHONE | REMARKS | | | | | | | | |
|----------------------------------|----------------------------------------|----------|-------------|-----------|---------------------------------------------|----------------|-------------------------|---------------------------------------------------------------------------------------------------|---------------|--------------|---------------|----------------|---------------|---------------|---------------|-----------------|
| Walter Oil & Gas Corpor | West Delta | 106 | OCS-G 08735 | A | A001, A002, A003, A004, A005, A006, A007, A | Dena Rodriguez | 281-578-3388 | Drill, complete, test, produce A007, A009; Production emissions include currently producing wells | | | | | | | | |
| OPERATIONS | EQUIPMENT | RATING | MAX. FUEL | ACT. FUEL | RUN TIME | | MAXIMUM POUNDS PER HOUR | | | | | ESTIMATED TONS | | | | |
| | Diesel Engines | HP | GAL/HR | GAL/D | | | | | | | | | | | | |
| | Nat. Gas Engines | HP | SCF/HR | SCF/D | | | | | | | | | | | | |
| | Burners | MMBTU/HR | SCF/HR | SCF/D | HR/D | D/YR | PM | SOx | NOx | VOC | CO | PM | SOx | NOx | VOC | CO |
| DRILLING* | PRIME MOVER>600hp diesel | 7580 | 366.114 | 2653.75 | 16 | 150 | 5.34 | 0.09 | 183.66 | 5.51 | 40.07 | 1.94 | 0.03 | 66.56 | 2.00 | 14.52 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PRIME MOVER>600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | BURNER diesel | 0 | | | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | AUXILIARY EQUIP<600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 2065 | 99.7395 | 2393.75 | 2 | 43 | 1.46 | 0.03 | 50.03 | 1.50 | 10.92 | 0.06 | 0.00 | 2.15 | 0.06 | 0.47 |
| | VESSELS>600hp diesel(supply) | 2065 | 99.7395 | 2393.75 | 2 | 22 | 1.46 | 0.03 | 50.03 | 1.50 | 10.92 | 0.03 | 0.00 | 1.10 | 0.03 | 0.24 |
| | VESSELS>600hp diesel(tugs) | 8400 | 405.72 | 9737.28 | 2 | 2 | 5.92 | 0.10 | 203.52 | 6.11 | 44.41 | 0.01 | 0.00 | 0.41 | 0.01 | 0.09 |
| PIPELINE INSTALLATION | PIPELINE LAY BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | SUPPORT VESSEL diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | PIPELINE BURY BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | SUPPORT VESSEL diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(supply) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| FACILITY INSTALLATION | DERRICK BARGE diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | MATERIAL TUG diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(crew) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | VESSELS>600hp diesel(supply) | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| PRODUCTION | RECIP.<600hp diesel | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Generator | RECIP.<600hp diesel | 460 | 22.218 | 533.23 | 12 | 365 | 1.01 | 0.01 | 14.19 | 1.13 | 3.07 | 2.22 | 0.01 | 31.07 | 2.49 | 6.72 |
| Generator | RECIP.<600hp diesel | 460 | 22.218 | 533.23 | 12 | 365 | 1.01 | 0.01 | 14.19 | 1.13 | 3.07 | 2.22 | 0.01 | 31.07 | 2.49 | 6.72 |
| | SUPPORT VESSEL diesel | 2065 | 99.7395 | 2393.75 | 2 | 31 | 1.46 | 0.03 | 50.03 | 1.50 | 10.92 | 0.05 | 0.00 | 1.55 | 0.05 | 0.34 |
| | TURBINE nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | RECIP.2 cycle lean nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| Compressor | RECIP.4 cycle lean nat gas | 1400 | 10000.2 | 240004.80 | 24 | 365 | | 0.01 | 36.39 | 2.22 | 4.93 | | 0.03 | 159.38 | 9.72 | 21.61 |
| | RECIP.4 cycle rich nat gas | 0 | 0 | 0.00 | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | BURNER nat gas | 0 | 0.00 | 0.00 | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | MISC. | BPD | SCF/HR | COUNT | | | | | | | | | | | | |
| | TANK- | 0 | | | 0 | 0 | | | | 0.00 | | | | | 0.00 | 0.00 |
| | FLARE- | | 0 | | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| | PROCESS VENT- | | 0 | | 0 | 0 | | | | 0.00 | | | | 0.00 | 0.00 | 0.00 |
| | FUGITIVES- | | | 500.0 | | 365 | | | | 0.25 | | | | 1.10 | | |
| | GLYCOL STILL VENT- | | 0 | | 0 | 0 | | | | 0.00 | | | | 0.00 | | |
| DRILLING WELL TEST | OIL BURN | 0 | | | 0 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | GAS FLARE | | 0 | | 0 | 0 | | 0.00 | 0.00 | 0.00 | 0.00 | | 0.00 | 0.00 | 0.00 | 0.00 |
| 2021-2030 YEAR TOTAL | | | | | | | 17.66 | 0.29 | 602.04 | 20.86 | 128.30 | 6.53 | 0.09 | 293.28 | 17.94 | 50.72 |
| EXEMPTION CALCULATION | DISTANCE FROM LAND IN MILES | | | | | | | | | | | 352.98 | 352.98 | 352.98 | 352.98 | 16406.51 |
| | 10.6 | | | | | | | | | | | | | | | |

* This AQR includes contingency drilling days each year for maintenance, workovers, recompletions, interventions and abandonment activities. Facility is within 100 km of Breton Sound, however contingency activity emissions will not occur for consecutive three years.

AIR EMISSIONS CALCULATIONS

| COMPANY | AREA | BLOCK | LEASE | PLATFORM | WELL |
|------------------|-------------------|--------|-------------|----------|------------------------|
| Walter Oil & Gas | West Delta | 106 | OCS-G 08735 | A | A001, A002, A003, A004 |
| Year | Emitted Substance | | | | |
| | PM | SOx | NOx | VOC | CO |
| 2019 | 5.51 | 0.07 | 258.28 | 16.89 | 43.08 |
| 2020 | 7.35 | 0.11 | 322.41 | 19.40 | 60.80 |
| 2021-2030 | 6.53 | 0.09 | 293.28 | 17.94 | 50.72 |
| Allowable | 352.98 | 352.98 | 352.98 | 352.98 | 16406.51 |

ENSCO 75
DAILY FUEL USAGE

| DATE | GALS USED | ACCUMULATED TOTAL |
|---------------------|------------------|--------------------------|
| JANUARY 2019 | | |
| 1/14/2019 | 1041 | 1041 |
| 1/15/2019 | 2641 | 3682 |
| 1/16/2019 | 3239 | 6921 |
| 1/17/2019 | 3171 | 10092 |
| 1/18/2019 | 3820 | 13912 |
| 1/19/2019 | 1467 | 15379 |
| 1/20/2019 | 2034 | 17413 |
| 1/21/2019 | 1191 | 18604 |
| 1/22/2019 | 1375 | 19979 |
| 1/23/2019 | 1609 | 21588 |
| 1/24/2019 | 1304 | 22892 |
| 1/25/2019 | 1869 | 24761 |
| 1/26/2019 | 1609 | 26370 |
| 1/27/2019 | 2708 | 29078 |
| 1/28/2019 | 4149 | 33227 |
| 1/29/2019 | 4644 | 37871 |
| 1/30/2019 | 1781 | 39652 |
| 1/31/2019 | 1732 | 41384 |
| | | 41384 |

| DATE | GALS USED | ACCUMULATED TOTAL |
|----------------------|------------------|--------------------------|
| FEBRUARY 2019 | | |
| 2/1/2019 | 1324 | 1324 |
| 2/2/2019 | 3291 | 4615 |
| 2/3/2019 | 2858 | 7473 |
| 2/4/2019 | 1869 | 9342 |
| 2/5/2019 | 3828 | 13170 |
| 2/6/2019 | 2432 | 15602 |
| 2/7/2019 | 1171 | 16773 |
| 2/8/2019 | 2884 | 19657 |
| 2/9/2019 | 3011 | 22668 |
| 2/10/2019 | 2317 | 24985 |
| 2/11/2019 | 1308 | 26293 |
| 2/12/2019 | 1530 | 27823 |
| 2/13/2019 | 1506 | 29329 |
| 2/14/2019 | 1405 | 30734 |
| 2/15/2019 | 739 | 31473 |
| 2/16/2019 | 1016 | 32489 |
| 2/17/2019 | 1693 | 34182 |
| 2/18/2019 | 678 | 34860 |
| 2/19/2019 | 1016 | 35876 |
| 2/20/2019 | 1777 | 37653 |
| 2/21/2019 | 1270 | 38923 |
| 2/22/2019 | 1050 | 39973 |
| 2/23/2019 | 1016 | 40989 |
| 2/24/2019 | 1184 | 42173 |
| 2/25/2019 | 1186 | 43359 |
| 2/26/2019 | 1255 | 44614 |
| 2/27/2019 | 755 | 45369 |
| 2/28/2019 | 1447 | 46816 |
| | | 46816 |

| DATE | GALS USED | ACCUMULATED TOTAL |
|-------------------|------------------|--------------------------|
| MARCH 2019 | | |
| 3/1/2019 | 1524 | 1524 |
| 3/2/2019 | 806 | 2330 |
| 3/3/2019 | 1302 | 3632 |
| 3/4/2019 | 2082 | 5714 |
| 3/5/2019 | 1103 | 6817 |
| 3/6/2019 | 855 | 7672 |
| 3/7/2019 | 2246 | 9918 |
| 3/8/2019 | 2542 | 12460 |
| 3/9/2019 | 840 | 13300 |
| 3/10/2019 | 1260 | 14560 |
| 3/11/2019 | 1557 | 16117 |
| 3/12/2019 | 1425 | 17542 |
| 3/13/2019 | 2139 | 19681 |
| 3/14/2019 | 1768 | 21449 |
| 3/15/2019 | 4227 | 25676 |
| 3/16/2019 | 4340 | 30016 |
| 3/17/2019 | 4823 | 34839 |
| 3/18/2019 | 4167 | 39006 |
| 3/19/2019 | 4659 | 43665 |
| 3/20/2019 | 4885 | 48550 |
| 3/21/2019 | 4512 | 53062 |
| 3/22/2019 | 2665 | 55727 |
| 8/23/2018 | 1693 | 57420 |
| 3/24/2019 | 1497 | 58917 |
| 3/25/2019 | 1681 | 60598 |
| 3/26/2019 | 871 | 61469 |
| 3/27/2019 | 2659 | 64128 |
| 3/28/2019 | 1928 | 66056 |
| 3/29/2019 | 2032 | 68088 |
| 3/30/2019 | 1121 | 69209 |
| 3/31/2019 | 1515 | 70724 |
| | | 70724 |

| DATE | GALS USED | ACCUMULATED TOTAL |
|-------------------|------------------|--------------------------|
| APRIL 2019 | | |
| 4/1/2019 | 501 | 501 |
| 4/2/2019 | 2935 | 3436 |
| 4/3/2019 | 1185 | 4621 |
| 4/4/2019 | 1429 | 6050 |
| 4/5/2019 | 1815 | 7865 |
| 4/6/2019 | 1999 | 9864 |
| 4/7/2019 | 1019 | 10883 |
| 4/8/2019 | 654 | 11537 |
| 4/9/2019 | 1732 | 13269 |
| 4/10/2019 | 1394 | 14663 |
| 4/11/2019 | 1788 | 16451 |
| 4/12/2019 | 2065 | 18516 |
| 4/13/2019 | 1351 | 19867 |
| 4/14/2019 | 1524 | 21391 |
| 4/15/2019 | 895 | 22286 |
| 4/16/2019 | 1345 | 23631 |
| 4/17/2019 | 1354 | 24985 |
| 4/18/2019 | 1892 | 26877 |
| 4/19/2019 | 1101 | 27978 |
| 4/20/2019 | 1783 | 29761 |
| 4/21/2019 | 1439 | 31200 |
| 4/22/2019 | 1697 | 32897 |
| 4/23/2019 | 1026 | 33923 |
| 4/24/2019 | 1969 | 35892 |
| 4/25/2019 | 1371 | 37263 |
| 4/26/2019 | 1579 | 38842 |
| 4/27/2019 | 1280 | 40122 |
| 4/28/2019 | 901 | 41023 |
| 4/29/2019 | 2370 | 43393 |
| 4/30/2019 | 2051 | 45444 |
| | | 45444 |

| DATE MAY 2019 | GALS USED | ACCUMULATED TOTAL |
|--------------------------|----------------------|------------------------------|
| 5/1/2019 | 1549 | 1549 |
| 5/2/2019 | 3873 | 5422 |
| 5/3/2019 | 3644 | 9066 |
| 5/4/2019 | 1830 | 10896 |
| 5/5/2019 | 1704 | 12600 |
| 5/6/2019 | 901 | 13501 |
| 5/7/2019 | 1640 | 15141 |
| 5/8/2019 | 1228 | 16369 |
| 5/9/2019 | 1782 | 18151 |
| 5/10/2019 | 2187 | 20338 |
| 5/11/2019 | 3715 | 24053 |
| 5/12/2019 | 4691 | 28744 |
| 5/13/2019 | 5551 | 34295 |
| 5/14/2019 | 4824 | 39119 |
| 5/15/2019 | 5416 | 44535 |
| 5/16/2019 | 3646 | 48181 |
| 5/17/2019 | 1683 | 49864 |
| 5/18/2019 | 1739 | 51603 |
| 5/19/2019 | 1272 | 52875 |
| 5/20/2019 | 1582 | 54457 |
| 5/21/2019 | 2276 | 56733 |
| 5/22/2019 | 2677 | 59410 |
| 5/23/2019 | 2032 | 61442 |
| 5/24/2019 | 3759 | 65201 |
| 5/25/2019 | 3859 | 69060 |
| 5/26/2019 | 4174 | 73234 |
| 5/27/2019 | 3732 | 76966 |
| 5/28/2019 | 4442 | 81408 |
| 5/29/2019 | 3162 | 84570 |
| 5/30/2019 | 743 | 85313 |
| 5/31/2019 | 1567 | 86880 |

| DATE JUNE 2019 | GALS USED | ACCUMULATED TOTAL |
|---------------------------|----------------------|------------------------------|
| 6/1/2019 | 2573 | 2573 |
| 6/2/2019 | 2026 | 4599 |
| 6/3/2019 | 3386 | 7985 |
| 6/4/2019 | 625 | 8610 |
| 6/5/2019 | 1680 | 10290 |
| 6/6/2019 | 1294 | 11584 |
| 6/7/2019 | 1583 | 13167 |
| 6/8/2019 | 1537 | 14704 |
| 6/9/2019 | 1270 | 15974 |
| 6/10/2019 | 1923 | 17897 |
| 6/11/2019 | 1389 | 19286 |
| 6/12/2019 | 1971 | 21257 |
| 6/13/2019 | 1582 | 22839 |
| 6/14/2019 | 1358 | 24197 |
| 6/15/2019 | 1849 | 26046 |
| 6/16/2019 | 1686 | 27732 |
| 6/24/2019 | 1524 | 29256 |
| 6/25/2019 | 1872 | 31128 |
| 6/26/2019 | 1355 | 32483 |
| 6/27/2019 | 1354 | 33837 |
| 6/28/2019 | 1591 | 35428 |
| 6/29/2019 | 1821 | 37249 |
| 6/30/2019 | 1101 | 38350 |
| | | 38350 |

| DATE JULY 2019 | GALS USED | ACCUMULATED TOTAL |
|---------------------------------|----------------------------|------------------------------------|
| 7/1/2019 | 1176 | 1176 |
| 7/2/2019 | 1932 | 3108 |
| 7/3/2019 | 1554 | 4662 |
| 7/4/2019 | 1451 | 6113 |
| 7/5/2019 | 2734 | 8847 |
| 7/6/2019 | 1835 | 10682 |
| 7/7/2019 | 2881 | 13563 |
| 7/8/2019 | 4116 | 17679 |
| 7/9/2019 | 2529 | 20208 |
| 7/10/2019 | 5585 | 25793 |
| 7/11/2019 | 2011 | 27804 |
| 7/12/2019 | 1375 | 29179 |
| 7/13/2019 | 1355 | 30534 |
| 7/14/2019 | 2497 | 33031 |
| 7/15/2019 | 2723 | 35754 |
| 7/16/2019 | 1770 | 37524 |
| 7/17/2019 | 1895 | 39419 |
| 7/18/2019 | 1225 | 40644 |
| 7/19/2019 | 3696 | 44340 |
| 7/20/2019 | 3402 | 47742 |
| 7/21/2019 | 1008 | 48750 |
| 7/22/2019 | 840 | 49590 |
| 7/23/2019 | 1260 | 50850 |
| 7/24/2019 | 5208 | 56058 |
| 7/25/2019 | 6156 | 62214 |
| 7/26/2019 | 4476 | 66690 |
| 7/27/2019 | 5063 | 71753 |
| 7/28/2019 | 2878 | 74631 |
| 7/29/2019 | 2097 | 76728 |
| 7/30/2019 | 1095 | 77823 |
| 7/31/2019 | 1355 | 79178 |

| DATE AUGUST 2019 | GALS USED | ACCUMULATED TOTAL |
|---------------------------------------------|------------------|------------------------------------|
| 8/1/2019 | 1854 | 1854 |
| 8/2/2019 | 1693 | 3547 |
| 8/3/2019 | 2293 | 5840 |
| 8/4/2019 | 1428 | 7268 |
| | | 7268 |

SECTION 9 OIL SPILL INFORMATION

9.1 OIL SPILL RESPONSE PLANNING

All the proposed activities and facilities in this DOCD will be covered by the Oil Spill Response Plan (OSRP) filed by Walter Oil & Gas Corporation (Company No. 00730) dated July 2019 and last approved on July 8, 2019 (OSRP Control No. O-370).

9.2 SPILL RESPONSE SITES

| Primary Response Equipment Location | Preplanned Staging Location |
|-------------------------------------|-----------------------------|
| Houma, LA | Houma, LA |
| Harvey, LA | Leeville, LA |
| Leeville, LA | Fourchon, LA |
| | Venice, LA |

9.3 OSRO INFORMATION

Walter's primary equipment provider is Clean Gulf Associates. Clean Gulf Associates Services, LLC will provide closest available personnel, as well as a supervisor to operate the equipment.

9.4 WORST-CASE DISCHARGE SCENARIO DETERMINATION

| Category | Drilling | | Production | |
|--------------------------------------------|--------------------|--------------------|----------------------|----------------------|
| | Regional OSRP WCD | DOCD WCD | Regional OSRP WCD | DOCD WCD |
| Type of Activity | >10 Miles Drilling | >10 Miles Drilling | >10 Miles Production | >10 Miles Production |
| Facility location (Area/Block) | EW 833 | WD 106 | EW 834 | WD 106 |
| Facility designation | Well Location A | A007 | A | A |
| Distance to nearest shoreline (miles) | 65 | 10.6 | 62 | 10.6 |
| Storage tanks & flowlines (bbl) | 0 | 0 | 3,178 | 850 |
| Lease term pipelines (bbl) | 0 | 0 | 1,542 | 0 |
| Uncontrolled blowout (bbl) | 112,743 | 94,108 | 11,988 | 5,276 |
| Total Volume (bbl) | 112,743 | 94,108 | 16,708 | 6,126 |
| Type of oil(s) (crude, condensate, diesel) | Crude | Crude | Crude | Crude |
| API gravity | 23.7° | 38° | 24.2° | 38° |

Walter has determined that the worst-case scenario from the activities proposed in this DOCD does not supersede the worst-case scenario from our approved Regional OSRP.

Since Walter Oil & Gas Corporation has the capability to respond to the worst-case spill scenario included in our Regional OSRP approved on July 8, 2019, and since the worst-case scenario determined for our DOCD does not replace the worst-case scenario in our Regional OSRP, Walter Oil & Gas Corporation hereby certifies that Walter Oil & Gas Corporation has the capability to respond, to the maximum extent practicable, to a worst-case discharge, or a substantial threat of such a discharge, resulting from the activities proposed in this DOCD.

9.5 OIL SPILL RESPONSE DISCUSSION

The Oil Spill Response Discussion is included as **Attachment 9-A**.

9.6 MODELING REPORT

Modeling reports are not required for the activities proposed in this plan.

SPILL RESPONSE DISCUSSION

For the purpose of NEPA and Coastal Zone Management Act analysis, the largest spill volume originating from the proposed activity would be a well blowout during drilling operations, estimated to be 94,108 barrels of crude oil with an API gravity of 38°.

Land Segment and Resource Identification

Trajectories of a spill and the probability of it impacting a land segment have been projected utilizing information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf of Mexico available on the BOEM website. The results are shown in **Figure 1**. The BOEM OSRAM identifies the highest probability of impact to the shorelines of Plaquemines Parish, Louisiana within 30 days. Plaquemines Parish includes Barataria Bay, the Mississippi River Delta, Breton Sound and the affiliated islands and bays. This region is an extremely sensitive habitat and serves as a migratory, breeding, feeding and nursery habitat for numerous species of wildlife. Beaches in this area vary in grain particle size and can be classified as fine sand, shell or perched shell beaches. Sandy and muddy tidal flats are also abundant.

Response

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

Using the estimated chemical and physical characteristics of crude oil, an ADIOS weathering model was run on a similar product from the ADIOS oil database. The results indicate 28% or approximately 26,350 barrels of crude oil would be evaporated/dispersed within 24 hours, with approximately 67,758 barrels remaining.

| Natural Weathering Data: WD 106, Well No. A007 | Barrels of Oil |
|-------------------------------------------------------|-----------------------|
| WCD Volume | 94,108 |
| Less 28% natural evaporation/dispersion | 26,350 |
| Remaining volume | 67,758 |

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

Walter’s Oil Spill Response Plan includes alternative response technologies such as dispersants and in-situ burn. Strategies will be decided by Unified Command based on an operations safety analysis, the size of the spill, weather and potential impacts. If aerial dispersants are utilized, 8

sorties (9,600 gallons) from two of the DC-3 aircrafts and 4 sorties (8,000 gallons) from the Basler aircraft would provide a daily dispersant capability of 7,540 barrels. If the conditions are favorable for in-situ burning, the proper approvals have been obtained and the proper planning is in place, in-situ burning of oil may be attempted. Slick containment boom would be immediately called out and on-scene as soon as possible. Offshore response strategies may include attempting to skim utilizing CGA spill response equipment, with a total derated skimming capacity of 706,980 barrels. Temporary storage associated with skimming equipment equals 32,796 barrels. If additional storage is needed, various storage barges with a total capacity 706,000+ bbls may be mobilized and centrally located to provide temporary storage and minimize off-loading time. **Safety is first priority. Air monitoring will be accomplished and operations deemed safe prior to any containment/skimming attempts.**

If the spill went unabated, shoreline impact in Plaquemines Parish, Louisiana would depend upon existing environmental conditions. Shoreline protection would include the use of CGA's near shore and shallow water skimmers with a totaled derated skimming capacity of 235,300 barrels. Temporary storage associated with skimming equipment equals 2,841 barrels. If additional storage is needed, various storage barges with a total capacity 235,000+ bbls may be mobilized and centrally located to provide temporary storage and minimize off-loading time. Onshore response may include the deployment of shoreline boom on beach areas, or protection and sorbent boom on vegetated areas. Master Service Agreements with AMPOL and OMI Environmental will ensure access to 144,800 feet of 18" shoreline protection boom. **Figure 2** outlines individual times needed for procurement, load out, travel time to the site and deployment. Strategies would be based upon surveillance and real time trajectories that depict areas of potential impact given actual sea and weather conditions. Applicable Area Contingency Plans (ACPs), Geographic Response Plans (GRPs), and Unified Command (UC) will be consulted to ensure that environmental and special economic resources are correctly identified and prioritized to ensure optimal protection. Shoreline protection strategies depict the protection response modes applicable for oil spill clean-up operations. As a secondary resource, the State of Louisiana Initial Oil Spill Response Plan will be consulted as appropriate to provide detailed shoreline protection strategies and describe necessary action to keep the oil spill from entering Louisiana's coastal wetlands. The UC should take into consideration all appropriate items detailed in Tactics discussion of this Appendix. The UC and their personnel have the option to modify the deployment and operation of equipment to allow for a more effective response to site-specific circumstances. Walter's contract Incident Management Team has access to the applicable ACP(s) and GRP(s).

Based on the anticipated worst case discharge scenario, Walter can be onsite with contracted oil spill recovery equipment with adequate response capacity to contain and recover surface hydrocarbons, and prevent land impact, to the maximum extent practicable, within an estimated 67 hours (based on the equipment's Effective Daily Recovery Capacity (EDRC)).

Initial Response Considerations

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

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

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

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

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

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

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

Offshore Response Actions

Equipment Deployment

Surveillance

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

Dispersant application assets

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

Containment boom

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

Oceangoing Boom Barge

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

In-situ Burn assets

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

Dedicated off-shore skimming systems

General

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

CGA HOSS Barge

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

CGA 95' Fast Response Vessels (FRVs)

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

CGA FRUs

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

T&T Koseq Skimming Systems

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

Storage Vessels

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

Vessels of Opportunity (VOO)

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

Adverse Weather Operations:

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

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

Maximization of skimmer-oil encounter rate

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

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

Maximize skimmer system efficiency

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

Recovered Oil Storage

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

Command, Control, and Communications (C³)

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

On Water Recovery Group

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

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

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

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

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

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

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

Initial set-up and potential actions:

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

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

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

TF 1

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

TF 2

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

TF 3

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

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

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

TF 4

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

TF 5

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

TF 6

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

TF 7

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

CGA Minimum Acceptable Capabilities for Vessels of Opportunity (VOO)

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

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

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

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

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

Tactical Overview

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

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

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

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



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



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

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

Tactical Overview

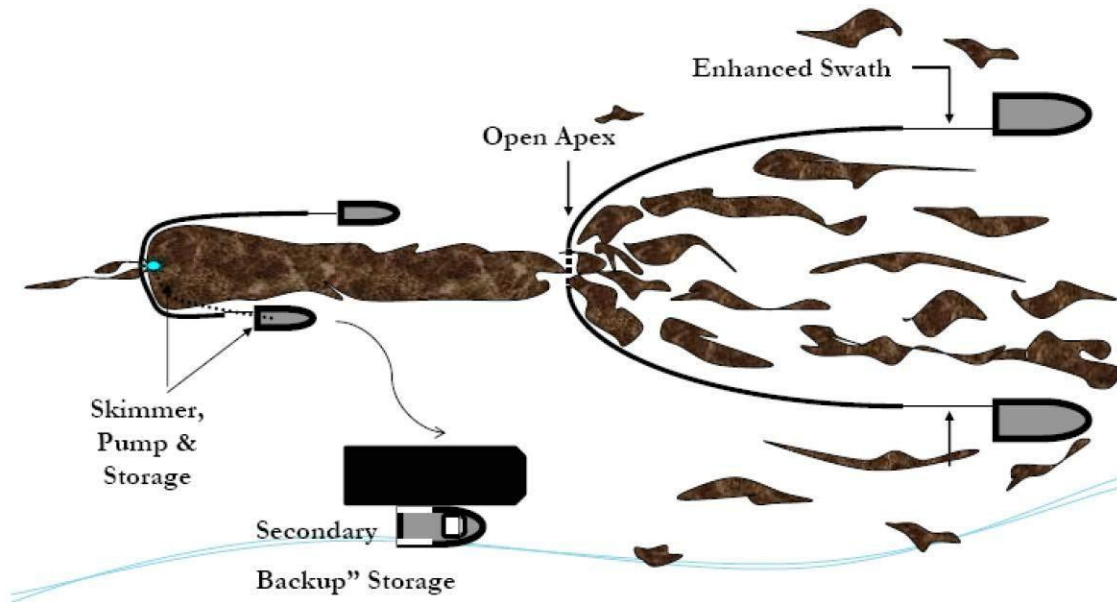
Mechanical Recovery – Deployed on large vessels of opportunity (VOO) the Koseq Rigid Sweeping Arms are high volume surge capacity deployed to increase recovery capacity at the source of a large oil spill in the offshore and outer nearshore environment of the Gulf of Mexico. They are highly mobile and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

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

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

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

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



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



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

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

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

Near Shore Response Actions

Timing

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

Considerations

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

Surveillance

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

Dispersant Use

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

Dedicated Near Shore skimming systems

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

VOO

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

Shoreline Protection Operations

Response Planning Considerations

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

Placement of boom

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

Beach Preparation - Considerations and Actions

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

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

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

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

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

Decanting Strategy

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

CGA Equipment Limitations

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

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

Environmental Conditions in the GOM

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

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

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

**FIGURE 1
TRAJECTORY BY LAND SEGMENT**

| <p>Trajectory of a spill and the probability of it impacting a land segment have been projected utilizing Walter's WCD and information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf of Mexico available on the BOEM website using 30 day impact. The results are tabulated below.</p> | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Area/Block | OCS-G | Launch Area | Land Segment and/or Resource | Conditional Probability (%) |
| <p>Drill, complete, test, produce 2 wells from existing WD106 'A' platform; provide air emissions for future activities</p> <p align="center">WD 106, Well No. A007</p> <p><i>10.6 miles from shore</i></p> | G08735 | C58 | <p>Matagorda, TX Galveston, TX Jefferson, TX Cameron, LA Vermilion, LA Iberia, LA Terrebonne, LA Lafourche, LA Jefferson, LA Plaquemines, LA</p> | <p>1 1 1 3 2 1 6 14 7 23</p> |

WCD Scenario– BASED ON WELL BLOWOUT DURING DRILLING OPERATIONS (10.6 miles from shore)
67,758 bbls of crude oil (Volume considering natural weathering)
API Gravity 38°

FIGURE 2 – Equipment Response Time to WD 106, Well No. A007

Dispersants/Surveillance

| Dispersant/Surveillance | Dispersant Capacity (gal) | Persons Req. | From | Hrs to Procure | Hrs to Loadout | Travel to site | Total Hrs |
|-------------------------|---------------------------|--------------|-------|----------------|----------------|----------------|-----------|
| ASI | | | | | | | |
| Basler 67T | 2000 | 2 | Houma | 2 | 2 | 0.5 | 4.5 |
| DC 3 | 1200 | 2 | Houma | 2 | 2 | 0.6 | 4.6 |
| DC 3 | 1200 | 2 | Houma | 2 | 2 | 0.6 | 4.6 |
| Aero Commander | NA | 2 | Houma | 2 | 2 | 0.5 | 4.5 |

Offshore Response

| Offshore Equipment Pre-Determined Staging | EDRC | Storage Capacity | VOO | Persons Required | From | Hrs to Procure | Hrs to Loadout | Hrs to GOM | Travel to Spill Site | Hrs to Deploy | Total Hrs |
|----------------------------------------------------------------------|-------|------------------|------------------|---------------------------|-----------|----------------|----------------|------------|----------------------|---------------|-----------|
| CGA | | | | | | | | | | | |
| HOSS Barge | 76285 | 4000 | 3 Tugs | 12 | Harvey | 6 | 0 | 12 | 2 | 2 | 22 |
| 95' FRV | 22885 | 249 | NA | 6 | Galveston | 2 | 0 | 2 | 16 | 1 | 21 |
| 95' FRV | 22885 | 249 | NA | 6 | Leeville | 2 | 0 | 2 | 2 | 1 | 7 |
| 95' FRV | 22885 | 249 | NA | 6 | Venice | 2 | 0 | 3 | 1 | 1 | 7 |
| 95' FRV | 22885 | 249 | NA | 6 | Vermilion | 2 | 0 | 3 | 6 | 1 | 12 |
| Boom Barge (CGA-300) 42" Auto Boom (25000') | NA | NA | 1 Tug 50 Crew | 4 (Barge) 2 (Per Crew) | Leeville | 8 | 0 | 4 | 6 | 2 | 20 |
| Enterprise Marine Services LLC (Available through contract with CGA) | | | | | | | | | | | |
| CTCo 2608 | NA | 23000 | 1 Tug | 6 | Amelia | 26 | 0 | 6 | 15 | 1 | 48 |
| CTCo 2609 | NA | 23000 | 1 Tug | 6 | Amelia | 26 | 0 | 6 | 15 | 1 | 48 |
| Kirby Offshore (available through contract with CGA) | | | | | | | | | | | |
| RO Barge | NA | 80000+ | 1 Tug | 6 | Venice | 53 | 0 | 4 | 2 | 1 | 60 |
| RO Barge | NA | 130000+ | 1 Tug | 6 | Venice | 53 | 0 | 4 | 2 | 1 | 60 |
| RO Barge | NA | 140000+ | 1 Tug | 6 | Venice | 53 | 0 | 4 | 2 | 1 | 60 |
| RO Barge | NA | 150000+ | 1 Tug | 6 | Venice | 53 | 0 | 4 | 2 | 1 | 60 |
| RO Barge | NA | 160000+ | 1 Tug | 6 | Venice | 53 | 0 | 4 | 2 | 1 | 60 |

Staging Area: Fourchon

| Offshore Equipment With Staging | EDRC | Storage Capacity | VOO | Persons Req. | From | Hrs to Procure | Hrs to Loadout | Travel to Staging | Travel to Site | Hrs to Deploy | Total Hrs |
|---------------------------------------------------------|--------|------------------|-----------|--------------|--------------|----------------|----------------|-------------------|----------------|---------------|-----------|
| T&T Marine (available through direct contract with CGA) | | | | | | | | | | | |
| Aqua Guard Triton RBS (1) | 22323 | 2000 | 1 Utility | 6 | Galveston | 4 | 12 | 12 | 4 | 2 | 34 |
| Aqua Guard Triton RBS (1) | 22323 | 2000 | 1 Utility | 6 | Harvey | 4 | 12 | 3 | 4 | 2 | 25 |
| Koseq Skimming Arms (10) Lamor brush | 228850 | 10000 | 5 OSV | 30 | Galveston | 24 | 24 | 12 | 4 | 2 | 66 |
| Koseq Skimming Arms (6) MariFlex 150 HF | 108978 | 6000 | 3 OSV | 18 | Galveston | 24 | 24 | 12 | 4 | 2 | 66 |
| Koseq Skimming Arms (2) Lamor brush | 45770 | 2000 | 1 OSV | 6 | Harvey | 24 | 24 | 3 | 4 | 2 | 57 |
| Koseq Skimming Arms (4) MariFlex 150 HF | 72652 | 4000 | 2 OSV | 12 | Harvey | 24 | 24 | 3 | 4 | 2 | 57 |
| CGA | | | | | | | | | | | |
| FRU (1) + 100 bbl Tank (2) | 4251 | 200 | 1 Utility | 6 | Morgan City | 2 | 6 | 3 | 4 | 1 | 16 |
| FRU (1) + 100 bbl Tank (2) | 4251 | 200 | 1 Utility | 6 | Vermilion | 2 | 6 | 5.5 | 4 | 1 | 18.5 |
| FRU (1) + 100 bbl Tank (2) | 4251 | 200 | 1 Utility | 6 | Galveston | 2 | 6 | 12 | 4 | 1 | 25 |
| FRU (1) + 100 bbl Tank (2) | 4251 | 200 | 1 Utility | 6 | Aransas Pass | 2 | 6 | 16.5 | 4 | 1 | 29.5 |
| FRU (1) + 100 bbl Tank (2) | 4251 | 200 | 1 Utility | 6 | Lake Charles | 2 | 6 | 7 | 4 | 1 | 20 |
| FRU (2) + 100 bbl Tank (4) | 8502 | 400 | 2 Utility | 12 | Leeville | 2 | 6 | 2 | 4 | 1 | 15 |
| FRU (2) + 100 bbl Tank (4) | 8502 | 400 | 2 Utility | 12 | Venice | 2 | 6 | 5 | 4 | 1 | 18 |
| Hydro-Fire Boom | NA | NA | 8 Utility | 40 | Harvey | 0 | 24 | 3 | 4 | 6 | 37 |

Nearshore Response

| Nearshore Equipment Pre-determined Staging | EDRC | Storage Capacity | VOO | Persons Required | From | Hrs to Procure | Hrs to Loadout | Hrs to GOM | Travel to Spill Site | Hrs to Deploy | Total Hrs |
|----------------------------------------------------------------------|-------|---------------------|-------|---------------------|--------------|-------------------|-------------------|---------------|-------------------------|------------------|--------------|
| CGA | | | | | | | | | | | |
| Mid-Ship SWS | 22885 | 249 | NA | 4 | Leeville | 2 | 0 | N/A | 48 | 1 | 51 |
| Mid-Ship SWS | 22885 | 249 | NA | 4 | Venice | 2 | 0 | N/A | 48 | 1 | 51 |
| Mid-Ship SWS | 22885 | 249 | NA | 4 | Galveston | 2 | 0 | N/A | 48 | 1 | 51 |
| Trinity SWS | 21500 | 249 | NA | 4 | Morgan City | 2 | 0 | N/A | 48 | 1 | 51 |
| Trinity SWS | 21500 | 249 | NA | 4 | Lake Charles | 2 | 0 | N/A | 48 | 1 | 51 |
| Trinity SWS | 21500 | 249 | NA | 4 | Vermilion | 2 | 0 | N/A | 48 | 1 | 51 |
| Trinity SWS | 21500 | 249 | NA | 4 | Galveston | 2 | 0 | N/A | 48 | 1 | 51 |
| 46' FRV | 15257 | 65 | NA | 4 | Aransas Pass | 2 | 0 | 2 | 19 | 1 | 24 |
| 46' FRV | 15257 | 65 | NA | 4 | Morgan City | 2 | 0 | 2 | 5 | 1 | 10 |
| 46' FRV | 15257 | 65 | NA | 4 | Lake Charles | 2 | 0 | 2 | 10 | 1 | 15 |
| 46' FRV | 15257 | 65 | NA | 4 | Venice | 2 | 0 | 2 | 2 | 1 | 7 |
| Kirby Offshore (Available through contract with CGA) | | | | | | | | | | | |
| RO Barge | NA | 80000+ | 1 Tug | 6 | Venice | 48 | 0 | 4 | 7 | 1 | 60 |
| Enterprise Marine Services LLC (Available through contract with CGA) | | | | | | | | | | | |
| CTCo 2603 | NA | 25000 | 1 Tug | 6 | Amelia | 25 | 0 | 6 | 16 | 1 | 48 |
| CTCo 2604 | NA | 20000 | 1 Tug | 6 | Amelia | 25 | 0 | 6 | 16 | 1 | 48 |
| CTCo 2605 | NA | 20000 | 1 Tug | 6 | Amelia | 25 | 0 | 6 | 16 | 1 | 48 |
| CTCo 2606 | NA | 20000 | 1 Tug | 6 | Amelia | 25 | 0 | 6 | 16 | 1 | 48 |
| CTCo 2607 | NA | 23000 | 1 Tug | 6 | Amelia | 25 | 0 | 6 | 16 | 1 | 48 |
| CTCo 5001 | NA | 47000 | 1 Tug | 6 | Amelia | 25 | 0 | 6 | 16 | 1 | 48 |

Staging Area: Venice

| Nearshore Equipment With Staging | EDRC | Storage Capacity | VOO | Persons Req. | From | Hrs to Procure | Hrs to Load Out | Travel to Staging | Travel to Deployment | Hrs to Deploy | Total Hrs |
|----------------------------------|------|------------------|-----------|--------------|--------------|----------------|-----------------|-------------------|----------------------|---------------|-----------|
| CGA | | | | | | | | | | | |
| SWS Egmopol | 1810 | 100 | NA | 3 | Galveston | 2 | 2 | 13 | 2 | 1 | 20 |
| SWS Egmopol | 1810 | 100 | NA | 3 | Morgan City | 2 | 2 | 4.5 | 2 | 1 | 11.5 |
| SWS Marco | 3588 | 20 | NA | 3 | Lake Charles | 2 | 2 | 8 | 2 | 1 | 15 |
| SWS Marco | 3588 | 34 | NA | 3 | Leeville | 2 | 2 | 4.5 | 2 | 1 | 11.5 |
| SWS Marco | 3588 | 34 | NA | 3 | Venice | 2 | 2 | 2 | 2 | 1 | 7 |
| Foilex Skim Package (TDS 150) | 1131 | 50 | 1 Utility | 3 | Lake Charles | 4 | 12 | 8 | 2 | 2 | 28 |
| Foilex Skim Package (TDS 150) | 1131 | 50 | 1 Utility | 3 | Galveston | 4 | 12 | 13 | 2 | 2 | 33 |
| Foilex Skim Package (TDS 150) | 1131 | 50 | 1 Utility | 3 | Harvey | 4 | 12 | 2 | 2 | 2 | 22 |
| 4 Drum Skimmer (Magnum 100) | 680 | 100 | 1 Crew | 3 | Lake Charles | 2 | 2 | 8 | 2 | 1 | 15 |
| 4 Drum Skimmer (Magnum 100) | 680 | 100 | 1 Crew | 3 | Harvey | 2 | 2 | 2 | 2 | 1 | 9 |
| 2 Drum Skimmer (TDS 118) | 240 | 100 | 1 Crew | 3 | Lake Charles | 2 | 2 | 8 | 2 | 1 | 15 |
| 2 Drum Skimmer (TDS 118) | 240 | 100 | 1 Crew | 3 | Harvey | 2 | 2 | 2 | 2 | 1 | 9 |

Shoreline Protection

Staging Area: Venice

| Shoreline Protection Boom | VOO | Persons Req. | Storage/Warehouse Location | Hrs to Procure | Hrs to Loadout | Travel to Venice | Travel to Deployment Site | Hrs to Deploy | Total Hrs |
|-------------------------------------------|---------|--------------|----------------------------|----------------|----------------|------------------|---------------------------|---------------|-----------|
| AMPOL (Available through MSA) | | | | | | | | | |
| 34,050' 18" Boom | 13 Crew | 26 | New Iberia, LA | 2 | 2 | 6 | 2 | 12 | 24 |
| 12,850' 18" Boom | 7 Crew | 14 | Chalmette, LA | 2 | 2 | 2.5 | 2 | 6 | 14.5 |
| 900' 18" Boom | 1 Crew | 2 | Morgan City, LA | 2 | 2 | 4.5 | 2 | 2 | 12.5 |
| 30,000' 18" Boom | 13 Crew | 26 | Harvey, LA | 2 | 2 | 2 | 2 | 12 | 20 |
| 1,700' 18" Boom | 2 Crew | 4 | Venice, LA | 2 | 2 | 0 | 2 | 2 | 8 |
| 14,750' 18" Boom | 7 Crew | 14 | Port Arthur, TX | 2 | 2 | 10 | 2 | 6 | 22 |
| OMI Environmental (Available through MSA) | | | | | | | | | |
| 12,500' 18" Boom | 6 Crew | 12 | New Iberia, LA | 1 | 1 | 6 | 2 | 3 | 13 |
| 4,850' 18" Boom | 2 Crew | 4 | Belle Chasse, LA | 1 | 1 | 2 | 2 | 3 | 9 |
| 8,000' 18" Boom | 3 Crew | 6 | Port Allen, LA | 1 | 1 | 5 | 2 | 3 | 12 |
| 2,000' 18" Boom | 1 Crew | 2 | Houma, LA | 1 | 1 | 4 | 2 | 3 | 11 |
| 2,500' 18" Boom | 1 Crew | 2 | Morgan City, LA | 1 | 1 | 5 | 2 | 3 | 12 |
| 1,600' 18" Boom | 1 Crew | 2 | Gonzalez, LA | 1 | 1 | 4 | 2 | 3 | 11 |
| 5,800' 18" Boom | 5 Crew | 10 | Venice, LA | 1 | 1 | 0 | 2 | 3 | 7 |
| 13,300' 18" Boom | 5 Crew | 10 | Harvey, LA | 1 | 1 | 2 | 2 | 3 | 9 |

| Wildlife Response | EDRC | Storage Capacity | VOO | Persons Req. | From | Hrs to Procure | Hrs to Loadout | Travel to Staging | Travel to Deployment | Hrs to Deploy | Total Hrs |
|--------------------------|------|------------------|-----|--------------|--------------|----------------|----------------|-------------------|----------------------|---------------|-----------|
| CGA | | | | | | | | | | | |
| Wildlife Support Trailer | NA | NA | NA | 2 | Harvey | 2 | 2 | 2 | 1 | 2 | 9 |
| Bird Scare Guns (24) | NA | NA | NA | 2 | Harvey | 2 | 2 | 2 | 1 | 2 | 9 |
| Bird Scare Guns (12) | NA | NA | NA | 2 | Galveston | 2 | 2 | 13 | 1 | 2 | 20 |
| Bird Scare Guns (12) | NA | NA | NA | 2 | Aransas Pass | 2 | 2 | 18 | 1 | 2 | 25 |
| Bird Scare Guns (48) | NA | NA | NA | 2 | Lake Charles | 2 | 2 | 8 | 1 | 2 | 15 |
| Bird Scare Guns (24) | NA | NA | NA | 2 | Leeville | 2 | 2 | 4.4 | 1 | 2 | 11.4 |

| Response Asset | Total |
|--------------------------------------------------|----------|
| Offshore EDRC | 706,980 |
| Offshore Recovered Oil Capacity | 738,796+ |
| Nearshore / Shallow Water EDRC | 235,300 |
| Nearshore / Shallow Water Recovered Oil Capacity | 237,841+ |

SECTION 10 ENVIRONMENTAL MONITORING INFORMATION

10.1 MONITORING SYSTEMS

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

10.2 INCIDENTAL TAKES

There is no reason to believe that any of the endangered species or marine mammals as listed in the Endangered Species Act (ESA) will be “taken” as a result of the operations proposed under this plan.

It has been documented that the use of explosives and/or seismic devices can affect marine life. Operations proposed in this plan will not be utilizing either of these devices.

Walter will adhere to the requirements as set forth in the following documents, as applicable, to avoid or minimize impacts to any of the species listed in the ESA as a result of the operations conducted herein:

- NTL No. 2015-BSEE-G03, “Marine Trash and Debris Awareness and Elimination”
- NTL No. 2016-BOEM-G01, “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting”
- NTL No. 2016-BOEM-G02, “Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program”

10.3 FLOWER GARDEN BANKS NATIONAL MARINE SANCTUARY

West Delta Block 106 is not located in the Flower Garden Banks National Marine Sanctuary; therefore, relevant information is not required in this DOCD.

SECTION 11 LEASE STIPULATIONS INFORMATION

11.1 PROTECTION OF ARCHAEOLOGICAL RESOURCES

In accordance with this stipulation, a Shallow Hazards Survey Report was submitted with Freeport-McMoRan Inc.'s Initial POE, Control No. N-4266.

11.2 MARINE PROTECTED SPECIES

In accordance with the Federal Endangered Species Act and the Marine Mammal Protection Act, Walter will:

- (a) Collect and remove flotsam resulting from activities related to exploration, development, and production of this lease;
- (b) Post signs in prominent places on all vessels and platforms used as a result of activities related to exploration, development, and production of this lease detailing the reasons (legal and ecological) why release of debris must be eliminated;
- (c) Observe for marine mammals and sea turtles while on vessels, reduce vessel speed to 10 knots or less when assemblages of cetaceans are observed, and maintain a distance of 90 meters or greater from whales, and a distance of 45 meters or greater from small cetaceans and sea turtles;
- (d) Employ mitigation measures prescribed by BOEM/BSEE or the National Marine Fisheries Service (NMFS) for all seismic surveys, including the use of an "exclusion zone" based upon the appropriate water depth, ramp-up and shutdown procedures, visual monitoring, and reporting;
- (e) Identify important habitats, including designated critical habitat, used by listed species (e.g., sea turtle nesting beaches, piping plover critical habitat), in oil spill contingency planning and require the strategic placement of spill cleanup equipment to be used only by personnel trained in less-intrusive cleanup techniques on beaches and bay shores; and
- (f) Immediately report all sightings and locations of injured or dead protected species (e.g., marine mammals and sea turtles) to the appropriate stranding network. If oil and gas industry activity is responsible for the injured or dead animal (e.g., because of a vessel strike), the responsible parties should remain available to assist the stranding network. If the injury or death was caused by a collision with the lessee's vessel, the lessee must notify BOEM within 24 hours of the strike.

BOEM and BSEE issue Notices to Lessees (NTLs), which more fully describe measures implemented in support of the above-mentioned implementing statutes and regulations, as well as measures identified by the U.S. Fish and Wildlife Service and NMFS arising from, among others, conservation recommendations, rulemakings pursuant to the MMPA, or consultation. The lessee and its operators, personnel, and subcontractors, while undertaking activities

authorized under this lease, must implement and comply with the specific mitigation measures outlined in NTL No. 2016-BOEM-G01, "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting;" NTL No. 2016-BOEM-G02, "Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program;" and NTL No. 2015-BSEE-G03, "Marine Trash and Debris Awareness and Elimination." At the lessee's option, the lessee, its operators, personnel, and contractors may comply with the most current measures to protect species in place at the time an activity is undertaken under this lease, including but not limited to new or updated versions of the NTLs identified in this paragraph. The lessee and its operators, personnel, and subcontractors will be required to comply with the mitigation measures, identified in the above referenced NTLs, and additional measures in the conditions of approvals for their plans or permits.

SECTION 12 ENVIRONMENTAL MITIGATION MEASURES INFORMATION

12.1 MEASURES TAKEN TO AVOID, MINIMIZE, AND MITIGATE IMPACTS

This plan does not propose activities for which the state of Florida is an affected state; therefore, mitigation information is not required for the activities proposed in this plan.

12.2 INCIDENTAL TAKES

Walter will adhere to the requirements set forth in the following documents, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) as a result of the operations conducted herein:

- NTL No. 2015-BSEE-G03, "Marine Trash and Debris Awareness and Elimination"
- NTL No. 2016-BOEM-G01, "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting"
- NTL No. 2016-BOEM-G02, "Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program"

SECTION 13 RELATED FACILITIES AND OPERATIONS INFORMATION

13.1 RELATED OCS FACILITIES AND OPERATIONS

The subject wells will be drilled, completed and produced from existing West Delta Block 106 Platform A. An existing 6.625-inch oil right-of-way pipeline approximately 1.6 miles in length (PSN 15679) is installed to transport produced oil from Platform A in West Delta Area Block 106 to a 12-inch subsea tie-in in West Delta Area Block 105. An existing 8.625-inch gas right-of-way pipeline approximately 8,451 feet in length (PSN 10387) is installed to transport produced gas from Platform A in West Delta Area Block 106 to a 20-inch subsea tie-in in West Delta Area Block 112. No new near shore or onshore pipelines or facilities will be constructed.

13.2 TRANSPORTATION SYSTEM

Hydrocarbon production will be transported as described above.

13.3 PRODUCED LIQUID HYDROCARBONS TRANSPORTATION VESSELS

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

SECTION 14 SUPPORT VESSELS AND AIRCRAFT INFORMATION

14.1 GENERAL

The most practical, direct route from the shorebase as permitted by weather and traffic conditions will be utilized. Information regarding the vessels and aircraft to be used to support the proposed activities is provided in the table below.

| Type | Maximum Fuel Tank Capacity | Maximum Number in Area at Any Time (drlg / prod) | Trip Frequency or Duration (drlg / prod) |
|--------------|----------------------------|--------------------------------------------------|------------------------------------------|
| Tug boat | 126,000 gal | 2 / 0 | 2 days total |
| Crew boat | 25,000 gal | 1 / 0 | 2 per week / 0 per week |
| Support boat | 35,000 gal | 1 / 1 | 1 per week / 1 per week |
| Helicopter | 440 gal | 1 / 1 | As needed |

14.2 DIESEL OIL SUPPLY VESSELS

Information regarding vessels to be used to supply diesel oil for fuel and other purposes is provided in the table below.

| Size of Fuel Supply Vessel (ft) | Capacity of Fuel Supply Vessel | Frequency of Fuel Transfers | Route Fuel Supply Vessel Will Take |
|---------------------------------|--------------------------------|-----------------------------|----------------------------------------|
| 180 | 100,000 gal | 1 / week | Shortest route from Shorebase to block |

14.3 DRILLING FLUID TRANSPORTATION

Drilling fluid transportation information is not required to be submitted with this plan.

14.4 SOLID AND LIQUID WASTE TRANSPORTATION

A table, "Wastes You Will Transport and/or Dispose of Onshore," is included as **Attachment 14-A**.

14.5 VICINITY MAP

A vicinity map showing the location of the activities proposed herein relative to the shoreline with the distance of the proposed activities from the shoreline and the primary routes of the support vessels and aircraft that will be used when traveling between the onshore support facilities and the platform is included as **Attachment 14-B**.

ATTACHMENT 14-A WASTES YOU WILL TRANSPORT AND /OR DISPOSE OF ONSHORE

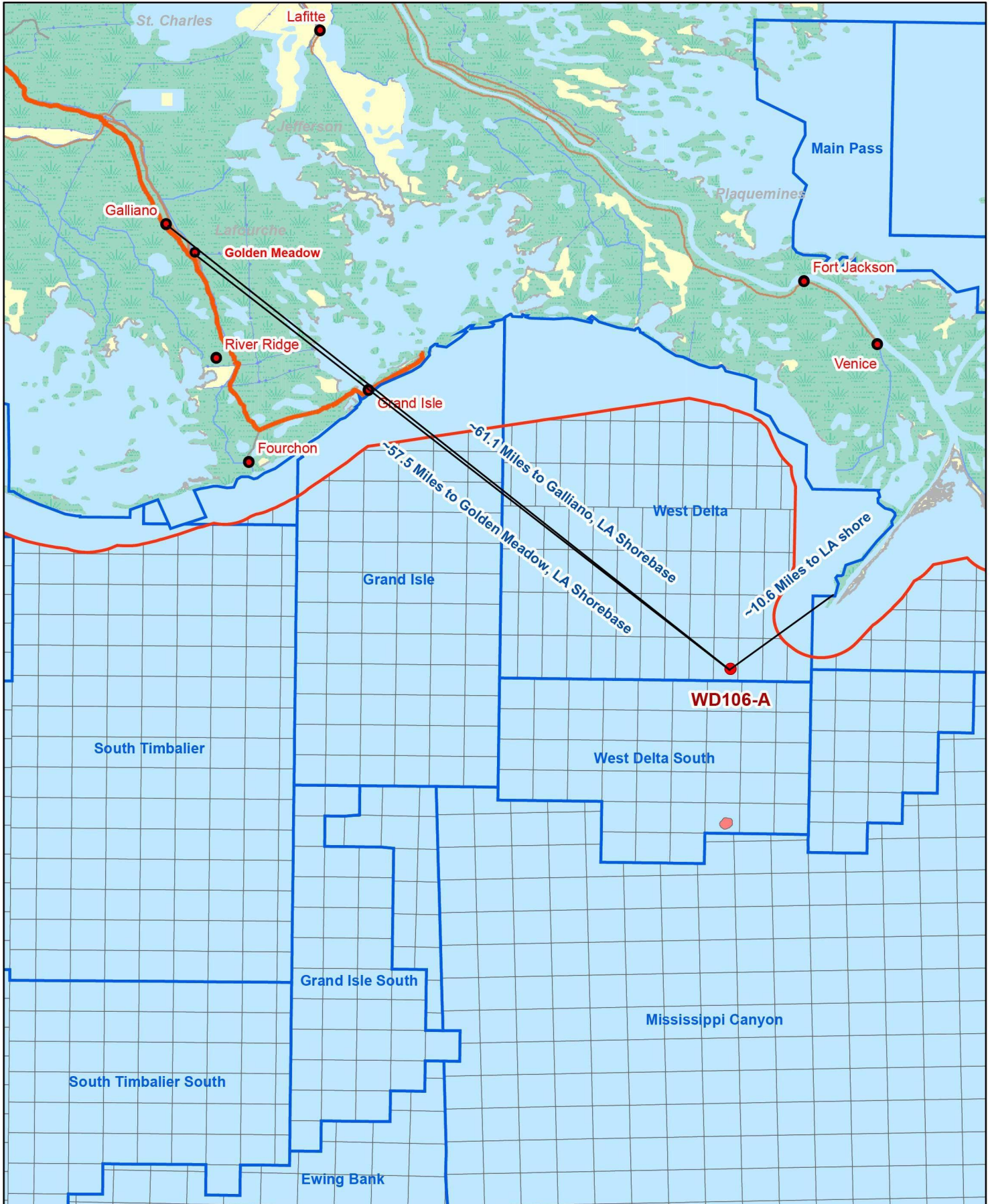
| <i>Please specify whether the amount reported is a total or per well</i> | | | | | |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------|---------------------------------------|----------------------------|-----------------------|
| Projected Generated Waste | | Solid and Liquid Wastes Transportation | Waste Disposal | | |
| Type of Waste | Composition | Transport Method | Name/Location of Facility | Amount | Disposal Method |
| Will drilling occur ? If yes, fill in the muds and cuttings. | | | | | |
| Oil-based drilling fluid or mud | NA | NA | NA | NA | NA |
| Synthetic-based drilling fluid or mud | Synthetic Fluid | Below Deck Storage Tanks on Workboat | M-I SWACO Plant, Fourchon, LA | 3,350 bbls | Recycled |
| Cuttings wetted with Water-based fluid | NA | NA | NA | NA | NA |
| Cuttings wetted with Synthetic-based fluid | NA | NA | NA | NA | NA |
| Cuttings wetted with oil-based fluids | NA | NA | NA | NA | NA |
| Completion Fluids | Calcium Chloride/Calcium Bromide/Zinc Bromide | Below deck storage tanks on offshore support vessel/marine portable tanks | R-360 or Ecoserve Fourchon, Louisiana | 500 bbls | Recycled |
| Completion Wash fluids from tank cleaning. | Calcium Chloride/Calcium Bromide/Zinc Bromide wash water | Below deck storage tanks on offshore support vessel/marine portable tanks | R-360 or Ecoserve Fourchon, Louisiana | 850 bbls | Recycled |
| Will you produce hydrocarbons? If yes fill in for produced sand. | | | | | |
| Produced sand | NA | NA | NA | NA | NA |
| Will you have additional wastes that are not permitted for discharge? If yes, fill in the appropriate rows. | | | | | |
| Trash and debris (non-recyclable) | While drilling Paper & Plastic | Garbage bags on Supply or Crew Boat | HOS Port, Fourchon, LA | 57 Bags at 40 cuft per bag | Landfill |
| Used oil | Oily rags/absorbent pads, used oil filters | 19 DOT Drums on Supply boat | R-360, Fourchon, LA | 7 Drums | Incineration |
| Wash water | NA | NA | NA | NA | NA |
| Chemical product wastes | While Drilling-Paint, solvents, light bulbs | Storage Bins on Supply or Crew Boat | Ecoserve, Fourchon, LA | 200 lb./yr | Recycle or Incinerate |
| Trash and debris (recyclable) | Batteries | 5 gallon Drum | Ecoserve, Fourchon, LA | 10 gal/yr | Recycled |

Note: If you will not have a type of waste, enter NA in the row.



Walter Oil & Gas Corporation

Vicinity Map
West Delta 106-A



SECTION 15 ONSHORE SUPPORT FACILITIES INFORMATION

15.1 GENERAL

The onshore facilities to be used to provide supply and service support for the proposed activities are provided in the table below.

| Name | Location | Existing/New/Modified |
|------------|--------------------------|-----------------------|
| EPS Dock | Golden Meadow, Louisiana | Existing |
| Roto Craft | Galliano, Louisiana | Existing |

15.2 SUPPORT BASE CONSTRUCTION OR EXPANSION

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

15.3 SUPPORT BASE CONSTRUCTION OR EXPANSION TIMETABLE

A support base construction or expansion timetable is not required for the activities proposed in this plan.

15.4 WASTE DISPOSAL

A table, "Wastes You Will Transport and/or Dispose of Onshore," is included as **Attachment 14-A**.

SECTION 16 COASTAL ZONE MANAGEMENT (CZM) INFORMATION

Under direction of the Coastal Zone Management Act (CZMA), the state of Louisiana developed a Coastal Zone Management Program (CZMP) to allow for the supervision of significant land and water use activities that take place within or that could significantly affect the Louisiana coastal zone.

Proposed activities are 52 miles from the Louisiana shore. Measures will be taken to avoid or mitigate the probable impacts. Walter will operate in compliance with existing federal and state laws, regulations, and resultant enforceable program policies in Louisiana's Coastal Zone Management Program.

The OCS related oil and gas exploratory and development activities having potential impact on the Louisiana Coastal Zone are based on the location of the proposed facilities, access to those sites, best practical techniques for drilling locations, drilling equipment guidelines for the prevention of adverse environmental effects, effective environmental protection, emergency plans and contingency plans.

Relevant enforceable policies were considered in certifying consistency for Louisiana. A certificate of Coastal Zone Management Consistency for the state of Louisiana is included as **Attachment 16-A**.

Attachment 16-A

COASTAL ZONE MANAGEMENT

CONSISTENCY CERTIFICATION

SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

WEST DELTA BLOCK 106 / 107

OCS-G 08735 / 08736

The proposed activity complies with the enforceable policies of the Louisiana approved management program and will be conducted in a manner consistent with such program.

Walter Oil & Gas Corporation

Lessee or Operator



Certifying Official

06 September 2019

Date

**SECTION 17
ENVIRONMENTAL IMPACT ANALYSIS (EIA)**

The Environmental Impact Analysis is included as **Attachment 17-A**.

Walter Oil & Gas Corporation (Walter)

Supplemental Development Operations Coordination Document West Delta Block 106 OCS-G 08735

(A) IMPACT PRODUCING FACTORS

ENVIRONMENTAL IMPACT ANALYSIS WORKSHEET

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

Footnotes for Environmental Impact Analysis Matrix

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

(B) ANALYSIS

Site-Specific at West Delta Block 106

Proposed operations consist of the drilling, completion, testing, and production of 2 wells from existing WD106 “A” platform with bottom hole locations in West Delta Block 107 (OCS-G 08736) and providing air emissions for future activities.

Operations will be conducted with a jack-up.

1. Designated Topographic Features

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

Physical disturbances to the seafloor: West Delta Block 106 is 14 miles from the closest designated Topographic Features Stipulation Block (Sackett Bank); therefore, no adverse impacts are expected.

Effluents: West Delta Block 106 is 14 miles from the closest designated Topographic Features Stipulation Block (Sackett Bank); therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5**, Water Quality). Oil spills cause damage to benthic organisms only if the oil contacts the organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on corals. Because the crests of topographic features in the Northern Gulf of Mexico are found below 10 m, no oil from a surface spill could reach their sessile biota. Oil from a subsurface spill is not applicable due to the distance of these blocks from a topographic area. The activities proposed in this plan will be covered by Walter’s Regional OSRP (refer to information submitted in **Section 9**).

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

2. Pinnacle Trend Area Live Bottoms

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

Physical disturbances to the seafloor: West Delta Block 106 is 70 miles from the closest live bottom (pinnacle trend) area; therefore, no adverse impacts are expected.

Effluents: West Delta Block 106 is 70 miles from the closest live bottom (pinnacle trend) area; therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5**, Water Quality). Oil spills have the potential to foul benthic communities and cause lethal and sublethal effects on live bottom organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on marine organisms. Oil from a subsurface spill is not applicable due to the distance of these blocks from a live bottom (pinnacle trend) area. The activities proposed in this plan will be covered by Walter's Regional OSRP (refer to information submitted in **Section 9**).

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

3. Eastern Gulf Live Bottoms

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

Physical disturbances to the seafloor: West Delta Block 106 is not located in an area characterized by the existence of live bottoms, and this lease does not contain a Live-Bottom Stipulation requiring a photo documentation survey and survey report.

Effluents: West Delta Block 106 is not located in an area characterized by the existence of live bottoms; therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5**, Water Quality). Oil spills cause damage to live bottom organisms only if the oil contacts the organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on marine invertebrates. Oil from a subsurface spill is not applicable due to the distance of these blocks from a live bottom area. The activities proposed in this plan will be covered by Walter's Regional OSRP (refer to information submitted in **Section 9**).

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

4. Benthic Communities

There are no IPFs (including emissions, physical disturbances to the seafloor, wastes sent to shore for disposal, or accidents) from the proposed activities that could cause impacts to benthic communities.

Operations proposed in this plan are in water depths of 250 feet. High-density benthic communities are found only in water depths greater than 984 feet (300 meters); therefore, Walter's proposed operations in West Delta Block 106 would not cause impacts to benthic communities.

5. Water Quality

IPFs that could result in water quality degradation from the proposed operations in West Delta Block 106 include disturbances to the seafloor, effluents and accidents.

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

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

Accidents: Oil spills have the potential to alter offshore water quality; however, it is unlikely that an accidental surface or subsurface spill would occur from the proposed activities. Between 1980 and 2000, OCS operations produced 4.7 billion barrels of oil and spilled only 0.001 percent of this oil, or 1 bbl for every 81,000 bbl produced. The spill risk related to a diesel spill from drilling operations is even less. Between 1976 and 1985, (years for which data were collected), there were 80 reported diesel spills greater than one barrel associated with drilling activities. Considering that there were 11,944 wells drilled, this is a 0.7 percent probability of an occurrence. If a spill were to occur, the water quality of marine waters would be temporarily affected by the dissolved components and small oil droplets. Dispersion by currents and microbial degradation would remove the oil from the water column and dilute the constituents to background levels. Historically, changes in offshore water quality from oil spills have only been detected during the life of the spill and up to several months afterwards. Most of the components of oil are insoluble in water and therefore float. The activities proposed in this plan will be covered by Walter's Regional Oil Spill Response Plan (refer to information submitted in **Section 9**).

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

6. Fisheries

IPFs that could cause impacts to fisheries as a result of the proposed operations in West Delta Block 106 include physical disturbances to the seafloor, effluents and accidents.

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

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

Accidents: An accidental oil spill has the potential to cause some detrimental effects on fisheries; however, it is unlikely that such an event would occur from the proposed activities (refer to **Item 5**, Water Quality). The effects of oil on mobile adult finfish or shellfish would likely be sublethal and the extent of damage would be reduced to the capacity of adult fish and shellfish to avoid the spill, to metabolize hydrocarbons, and to excrete both metabolites and parent compounds. The activities proposed in this plan will be covered by Walter's Regional OSRP (refer to information submitted in **Section 9**).

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

7. Marine Mammals

GulfCet II studies revealed that cetaceans of the continental shelf and shelf-edge were almost exclusively bottlenose dolphin and Atlantic spotted dolphin. Squid eaters, including dwarf and pygmy killer whale, Risso's dolphin, rough-toothed dolphin, and Cuvier's beaked whale, occurred most frequently along the upper slope in areas outside of anticyclones. IPFs that could cause impacts to marine mammals as a result of the proposed operations in West Delta Block 106 include emissions, effluents, discarded trash and debris, and accidents.

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

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

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

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

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

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

immediately, regardless of whether the injury or death is caused by their vessel, to the NMFS Southeast Marine Mammal Stranding Hotline at 1-877-433-8299 (<http://www.nmfs.noaa.gov/pr/health/report.htm#southeast>). Any injured or dead protected species should also be reported to takereport.nmfs@noaa.gov. In addition, if the injury or death was caused by a collision with a contract vessel, the BOEM must be notified within 24 hours of the strike by email to protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

Oil spills have the potential to cause sublethal oil-related injuries and spill-related deaths to marine mammals. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Oil spill response activities may increase vessel traffic in the area, which could add to changes in cetacean behavior and/or distribution, thereby causing additional stress to the animals. The effect of oil dispersants on cetaceans is not known. The acute toxicity of oil dispersant chemicals included in Walter's OSRP is considered to be low when compared with the constituents and fractions of crude oils and diesel products. The activities proposed in this plan will be covered by Walter's OSRP (refer to information submitted in accordance with **Section 9**).

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

8. Sea Turtles

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

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

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

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

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

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

Accidents: Collisions between support vessels and sea turtles would be unusual events, however should one occur, death or injury to sea turtles is possible. Contract vessel operators can avoid sea turtles and reduce potential deaths by maintaining a vigilant watch for sea turtles and maintaining a safe distance when they are sighted. Vessel crews should use a reference guide to help identify the five species of sea turtles that may be encountered in the Gulf of Mexico OCS. Vessel crews must report sightings of any injured or dead protected sea turtle species immediately, regardless of whether the injury or death is caused by their vessel, to the State Coordinators for the Sea Turtle Stranding and Salvage Network (STSSN) at http://www.sefsc.noaa.gov/species/turtles/stranding_coordinators.htm (phone numbers vary by state). Any injured or dead protected species should also be reported to takereport.nmfs@noaa.gov. In addition, if the injury or death was caused by a collision with a contract vessel, the BOEM must be notified within 24 hours of the strike by email to protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

All sea turtle species and their life stages are vulnerable to the harmful effects of oil through direct contact or by fouling of their food. Exposure to oil can be fatal, particularly to juveniles and hatchlings. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Oil spill response activities may increase vessel traffic in the area, which could add to the possibility of collisions with sea turtles. The activities proposed in this plan will be covered by Walter's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Section 9**).

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

9. Air Quality

West Delta Block 106 is located 46 miles from the Breton Wilderness Area and 10.6 miles from shore. Applicable emissions data is included in **Section 8** of the Plan.

There would be a limited degree of air quality degradation in the immediate vicinity of the proposed activities. Plan Emissions for the proposed activities do not exceed the annual exemption levels as set forth by BOEM. Accidents and blowouts can release hydrocarbons or chemicals, which could cause the emission of air pollutants. However, these releases would not impact onshore air quality because of the prevailing atmospheric conditions, emission height, emission rates, and the distance of West Delta Block 106 from the coastline. There are no other IPFs (including effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal) from the proposed activities which would impact air quality.

10. Shipwreck Sites (known or potential)

IPFs that could impact known or unknown shipwreck sites as a result of the proposed operations in West Delta Block 106 include disturbances to the seafloor and accidents (oil spill). West Delta Block 106 is not located in or adjacent to an OCS block designated by BOEM as having a high probability for occurrence of shipwrecks. Walter will report to BOEM the discovery of any evidence of a shipwreck and make every reasonable effort to preserve and protect that cultural resource. There are no other IPFs (including emissions, effluents, wastes sent to shore for treatment or disposal, or accidents) from the proposed activities which could impact shipwreck sites.

Accidents: An accidental oil spill has the potential to cause some detrimental effects to shipwreck sites if the release were to occur subsea. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Walter's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Section 9**).

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

11. Prehistoric Archaeological Sites

IPFs that could cause impacts to prehistoric archaeological sites as a result of the proposed operations in West Delta Block 106 are physical disturbances to the seafloor and accidents (oil spills).

Physical Disturbances to the seafloor: West Delta Block 106 is located inside the Archaeological Prehistoric high probability lines. Walter will report to BOEM the discovery of any object of prehistoric archaeological significance and make every reasonable effort to preserve and protect that cultural resource.

Accidents: An accidental oil spill has the potential to cause some detrimental effects to prehistoric archaeological sites if the release were to occur subsea. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Walter's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Section 9**).

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

Vicinity of Offshore Location

1. Essential Fish Habitat (EFH)

IPFs that could cause impacts to EFH as a result of the proposed operations in West Delta Block 106 include physical disturbances to the seafloor, effluents and accidents. EFH includes all estuarine and marine waters and substrates in the Gulf of Mexico.

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

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

Accidents: An accidental oil spill has the potential to cause some detrimental effects on EFH. Oil spills that contact coastal bays and estuaries, as well as OCS waters when pelagic eggs and larvae are present, have the greatest potential to affect fisheries. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Walter's Regional OSRP (refer to information submitted in **Section 9**).

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

2. Marine and Pelagic Birds

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

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

Accidents: An oil spill would cause localized, low-level petroleum hydrocarbon contamination. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Marine and pelagic birds feeding at the spill location may experience chronic, nonfatal, physiological stress. It is expected that few, if any, coastal and marine birds would actually be affected to that extent. The activities proposed in this plan will be covered by Walter's Regional OSRP (refer to information submitted in **Section 9**).

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

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

3. Public Health and Safety Due to Accidents.

There are no IPFs (emissions, effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal or accidents, including an accidental H₂S releases) from the proposed activities which could cause impacts to public health and safety. In accordance with NTL No.'s 2008-G04, 2009-G27, and 2009-G31, sufficient information is included in **Section 4** to justify our request that our proposed activities be classified by BSEE as H₂S absent.

Coastal and Onshore

1. Beaches

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

Accidents: Oil spills contacting beaches would have impacts on the use of recreational beaches and associated resources. Due to the distance from shore (10.6 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by Walter's Regional OSRP (refer to information submitted in **Section 9**).

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

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

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

2. Wetlands

Salt marshes and seagrass beds fringe the coastal areas of the Gulf of Mexico. Due to the distance from shore (10.6 miles), accidents (oil spills) and discarded trash and debris represent IPFs which could impact these resources.

Accidents: Level of impact from an oil spill will depend on oil concentrations contacting vegetation, kind of oil spilled, types of vegetation affected, season of the year, pre-existing stress level of the vegetation, soil types, and numerous other factors. Light-oiling impacts will cause plant die-back with recovery within two growing seasons without artificial replanting. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water quality). If a spill were to occur, response capabilities as outlined in Walter's Regional OSRP (refer to information submitted in **Section 9**) would be implemented.

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

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

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

3. Shore Birds and Coastal Nesting Birds

Pass A Loutre WMA (22 miles from West Delta Block 106) is a highly productive habitat for wildlife. Thousands of shore birds use the refuge as a wintering area. Also, wading birds nest on the refuge. The Pass A Loutre WMA provides habitat for colonies of nesting wading birds and seabirds as well as wintering shorebirds and waterfowl. The most abundant nesters are brown pelicans, laughing gulls, and royal, Caspian, and sandwich terns. IPFs from the proposed activities that could cause impacts to shore birds and coastal nesting birds are accidents (oil spills) and discarded trash and debris.

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

Oil-spill cleanup operations will result in additional disturbance of coastal birds after a spill. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water quality). Due to the distance from shore (10.6 miles), Walter would immediately implement the response capabilities outlined in their Regional OSRP (refer to information submitted in **Section 9**).

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

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

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

4. Coastal Wildlife Refuges

West Delta Block 106 is approximately 22 miles from the Pass A Loutre WMA. Management goals of the Pass A Loutre WMA are waterfowl habitat management, marsh restoration, providing sanctuary for nesting and wintering seabirds, and providing sandy beach habitat for a variety of wildlife species. IPFs from the proposed activities that could cause impacts to this coastal wildlife refuge are accidents (oil spills) and discarded trash and debris.

Impacts to shore birds and coastal nesting birds and to the beach, was covered in previous sections. Other wildlife species found on the refuges include nutria, rabbits, raccoons, alligators, and loggerhead turtles. Impacts to loggerhead turtles were also covered under a previous section.

Accidents: It is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water quality). Response capabilities would be implemented, no impacts are expected. The activities proposed in this plan will be covered by Walter's Regional OSRP (refer to information submitted in **Section 9**).

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

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

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

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

5. Wilderness Areas

Accidents: An accidental oil spill from the proposed activities could cause impacts to wilderness areas. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5, Water Quality**). Due to the distance from the nearest designated Wilderness Area (46 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by Walter's Regional OSRP (refer to information submitted in **Section 9**).

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

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

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

6. Other Environmental Resources Identified

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

(C) IMPACTS ON PROPOSED ACTIVITIES

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

(D) ENVIRONMENTAL HAZARDS

During the hurricane season, June through November, the Gulf of Mexico is impacted by an average of ten tropical storms (39-73 mph winds), of which six become hurricanes (> 74 mph winds). Due to its location in the gulf, West Delta Block 106 may experience hurricane and tropical storm force winds, and related sea currents. These factors can adversely impact the integrity of the operations covered by this plan. A significant storm may present physical hazards to operators and vessels, damage exploration or production equipment, or result in the release of hazardous materials (including hydrocarbons). Additionally, the displacement of equipment may disrupt the local benthic habitat and pose a threat to local species.

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

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

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

2. Platform / Structure Installation
Operator will not conduct platform / structure installation operations during Tropical Storm or Hurricane threat.
3. Pipeline Installation
Operator will not conduct pipeline installation operations during Tropical Storm or Hurricane threat.

(E) ALTERNATIVES

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

(F) MITIGATION MEASURES

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

(G) CONSULTATION

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

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(I) REFERENCES

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

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

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

SECTION 18 ADMINISTRATIVE INFORMATION

18.1 EXEMPTED INFORMATION DESCRIPTION

The proposed bottomhole locations of the planned wells have been removed from the Public Information copy of the DOCD as well as any discussions of the target objectives, geologic or geophysical data, and interpreted geology.

18.2 BIBLIOGRAPHY

1. Initial Exploration Plan (Control No. N-4266).
2. Initial Development Operations Coordination Document (Control No. N-4798)