



# United States Department of the Interior

## BUREAU OF OCEAN ENERGY MANAGEMENT

Gulf of Mexico OCS Region  
1201 Elmwood Park Boulevard  
New Orleans, LA 70123-2394

In Reply Refer To: GM 235D

July 1, 2020

Ms. Mandy L. Phythian  
Talos Energy Offshore LLC  
500 Dallas St, Suite 2000  
Houston, Texas 77002-4800

Dear Ms. Phythian,

Reference is made to the following plan:

Control No. N-10093  
Type Initial Exploration Plan  
Received November 21, 2019, amended December 16, 2019, January 14, February 7,  
and May 14, 2020  
Lease(s) OCS-G 34977, Block 326, Green Canyon Area (GC)  
OCS-G 34978, Block 327, Green Canyon Area (GC)  
OCS-G 34980, Block 370, Green Canyon Area (GC)  
OCS-G 34981, Block 371, Green Canyon Area (GC)

You are hereby notified that the approval of the subject plan has been granted as of July 1, 2020, in accordance with 30 CFR 550.233(b)(1).

This approval includes the activities proposed for the below listed subsea wells.

Well	Area and Block	Lease No.
E	GC 326	OCS-G 34977
A	GC 327	OCS-G 34978
B	GC 327	OCS-G 34978
C	GC 327	OCS-G 34978
H	GC 370	OCS-G 34980
D	GC 371	OCS-G 34981
F	GC 371	OCS-G 34981
G	GC 371	OCS-G 34981

In accordance with 30 CFR 556.901(d), additional security may be required for your proposed activities. Prior to conducting activities in which you need to obtain approvals and/or permits described in 30 CFR 550.281(a) from the appropriate District Manager or BSEE Regional Supervisor, you must contact BOEM Risk Management Operations Group by email at [boermog@boem.gov](mailto:boermog@boem.gov) to determine if additional security is required and comply with any demand for this security.

Exercise caution while drilling due to indications of shallow gas, faulting, and possible water flow.

In response to the request accompanying your plan for a hydrogen sulfide (H<sub>2</sub>S) classification, the area in which the proposed drilling operations are to be conducted is hereby classified, in accordance with 30 CFR 250.490(c), as "H<sub>2</sub>S absent."

You must comply with the following species protective measures in all activities conducted pursuant to the plan:

- **COMPLIANCE WITH BIOLOGICAL OPINION TERMS AND CONDITIONS AND REASONABLE AND PRUDENT MEASURES:** This approval is conditioned upon compliance with the Reasonable and Prudent Measures and implementing Terms and Conditions of the Biological Opinion issued by the National Marine Fisheries Service (NMFS) on March 13, 2020. This includes mitigation, particularly any appendices to Terms and Conditions applicable to the plan, as well as record-keeping and reporting sufficient to allow BOEM and BSEE to comply with reporting and monitoring requirements under the Biological Opinion; and any additional reporting required by BOEM or BSEE developed as a result of Biological Opinion implementation. The NMFS Biological Opinion may be found here: <https://www.fisheries.noaa.gov/resource/document/biological-opinion-federally-regulated-oil-and-gas-program-activities-gulf-mexico>. The Appendices and protocols may be found here: <https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.
- **SUPPORT BASES AND VESSEL TRANSIT ROUTES:** Approval of your plan is conditioned upon your use of the support bases and vessel transit routes as described in your plan. BOEM/BSEE must be notified at least 15 days prior to any vessel route changes that require transit of the Bryde's Whale area, and you must receive prior approval for that transit from BOEM/BSEE.
- **MARINE TRASH AND DEBRIS AWARENESS AND ELIMINATION:** The applicant will follow the guidance provided under Appendix B. Gulf of Mexico Marine Trash and Debris Awareness and Elimination Survey Protocols found in the Biological Opinion issued by NMFS on March 13, 2020. The guidance can be accessed on the National Oceanic and Atmospheric Administration (NOAA) Fisheries internet website at <https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.
- **VESSEL-STRIKE AVOIDANCE/REPORTING:** The applicant will follow the guidance provided under Appendix C. Gulf of Mexico Vessel Strike Avoidance and Injured/Dead Aquatic Protected Species Reporting Protocols found in the Biological Opinion issued by NMFS on March 13, 2020. The guidance can be accessed on the NOAA Fisheries internet site at <https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.
- **SEISMIC SURVEY OPERATION, MONITORING, AND REPORTING GUIDELINES:** The applicant will follow the guidance provided under Appendix A.

Seismic Survey Mitigation and Protected Species Observer Protocols found in the Biological Opinion issued by NMFS on March 13, 2020. The guidance can be accessed on the NOAA Fisheries internet site at

<https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.

- **MOON POOL MONITORING AND REPORTING:** A moon pool has been identified during review of your plan submittal. If any sea turtle or other marine mammal is detected, you are required to contact NMFS at [nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov) and BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov) for additional guidance and incidental report information.

The following measures regarding moon pools shall also be taken by the applicant:

- Prior to movement of the vessel and/or deployment and retrieval of equipment, the moon pool must be monitored continuously by a dedicated observer with no other tasks, to ensure no Endangered Species Act (ESA) listed species are present in the moon pool. Monitoring time depends on moon pool size as follows: large moon pools (i.e., greater than 45 feet in length on any side or a diameter greater than 40 feet for circular pools) should be monitored for at least 30 minutes prior to activity; medium moon pools (i.e., 20 feet to 45 feet in length on any side, or 20 to 40 feet in diameter for circular pools) should be monitored for at least 20 minutes prior to activity; small moon pools (i.e., smaller than 20 feet in length on any side or 20 feet or less in diameter for circular pools) should be monitored for at least 10 minutes prior to activity. If visibility is limited in the moon pool due to turbidity or low light, 30 minutes of monitoring is required regardless of moon pool size.
- Equipment should be deployed and retrieved at a slow enough rate to ensure that any potential for interaction with an undetected ESA listed species would not cause harm.
- If the moon pool has hull doors that can be closed, then the moon pool must be monitored continuously prior to and following closure by a dedicated crew observer with no other tasks to ensure that no ESA listed species are contained within the moon pool prior to transit. Monitoring time should be based on moon pool size as described above. If visibility is limited in the moon pool due to turbidity or low light, 30 minutes of monitoring are required regardless of moon pool size.
- If the moon pool has hull doors that can be closed, the operator should attempt to keep hull doors closed at all times when no activity is occurring within the moon pool, unless the safety of crew or vessel require otherwise.
- **ENTANGLEMENT AND ENTRAPMENT MONITORING AND REPORTING:** Any interaction with equipment or entanglement/entrapment of any ESA listed species (i.e., the animal cannot or does not leave the pool of its own volition) must be reported immediately. For assistance with marine mammals and sea turtles contact the stranding network listed at [www.fisheries.noaa.gov/report](http://www.fisheries.noaa.gov/report) and call BSEE at (985)722-7902 for additional guidance on continued monitoring requirements, recovery assistance needs (if required), and incidental report information. Other ESA listed species (e.g., giant manta ray) should be reported to relevant state agency wildlife lines, the ESA Section 7 biologist, and BSEE at (985)722-7902.
- Any observation of a leatherback turtle (regardless of whether interaction with equipment or entanglement/entrapment is observed) must be reported immediately using contact information above.

- The vessel should not be moved and equipment should not be deployed or retrieved to/from the pool, to the extent practicable, until NMFS and BSEE are contacted and provide input on how to proceed.
- Any ESA listed species observed within a moon pool that then leaves the moon pool of its own volition should be reported within 24 hours to NMFS at [nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov) and BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov).
- If the observed animal is no longer observed in the moon pool, monitoring should take place for at least 30 minutes to ensure it has left the moon pool. After 30 minutes, activities may commence.

These measures are designed to promote environmental protection, consistent environmental policy, compliance with environmental laws, and safety.

If you have any questions or comments concerning this approval, please contact Ronald O'Connor at (504)736-2889.

Sincerely,

for Bernadette Thomas  
Regional Supervisor  
Office of Leasing and Plans