



# 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

November 27, 2020

Mr. David Strassner  
EC Offshore Properties, Inc.  
600 Travis St., Suite 600  
Houston, Texas 77002

Dear Mr. Strassner,

Reference is made to the following plan:

|             |  |
|-------------|--|
| Control No. | S-8016   |
| Type        | Supplemental Development Operations Coordination Document                                    |
| Received    | July 20, 2020, amended October 16, 2020  |
| Lease(s)    | OCS 00184, Block 72, East Cameron Area (EC)<br>OCS-G 13576, Block 71, East Cameron Area (EC) |

You are hereby notified that the approval of the subject plan has been granted as of November 27, 2020, in accordance with 30 CFR 550.270(b)(1).

This approval includes the activities proposed for Caisson 006 and Wells 006 and C007 in EC Block 72, Wells A001 and A007 in EC Block 71, and the revision of air emissions for Platforms A (Complex ID 20217-1) and C (Complex ID 20217-2) in EC Block 71.

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 [boemrmog@boem.gov](mailto:boemrmog@boem.gov) to determine if additional security is required and comply with any demand for this security.

Our review indicates that there are pipelines in the vicinity of Platforms A and C and Wells A001, A007, and C007 that may pose a hazard to your proposed operations. Therefore, take precautions in accordance with Notice to Lessees and Operators No. 2008-G05, Section VI.B, prior to performing operations.

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 the NMFS on March 13, 2020. The guidance can be accessed on the National Oceanic and Atmospheric Administration (NOAA) Fisheries internet site 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 the 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 the 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>.
- **SEA TURTLE RESUSCITATION GUIDELINES:** The applicant will follow the guidance provided under Appendix J. Sea Turtle Handling and Resuscitation Guidelines found in the Biological Opinion issued by the 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>.
- **SLACK-LINE PRECAUTIONS AND REPORTING REQUIREMENT:** If operations require the use of flexible, small diameter (< 1 inch) nylon, plastic, or fiber

lines to support operations (with or without divers), operators and contractors must reduce the slack in the line to prevent accidental entanglement of Endangered Species Act (ESA) listed species. The following measures are required (noting that diver safety is paramount, and the following measures should be followed only in cases where they do not jeopardize human safety).

1. Operators must utilize tensioning tools and/or other appropriate procedures to reduce unnecessary looseness in the lines and/or potential looping.
2. The lines must remain taut.
3. A line tender must be present at all times during dive operations and must monitor the line(s) the entire time a diver is in the water.
4. Should the line tender and/or diver become aware of any ESA listed species entanglement, the following protocols must be followed as soon as safety permits.

Should an ESA listed species interaction result in entanglement, entrapment and/or injury occur, the interaction must be reported immediately or after diver safety (if present) is ensured.

For assistance with marine mammals contact the number(s) below:

| <b>Marine Mammals</b>          |                  |
|--------------------------------|------------------|
| <b>State Stranding Network</b> | <b>Telephone</b> |
| Texas                          | (800) 962-6625   |
| Louisiana                      | (504) 235-3005   |
| Mississippi                    | (888) 767-3657   |
| Alabama                        | (877) 942-5343   |
| Florida                        | (888) 404-3922   |

\* Note: If you do not receive a response, go to the following website to ensure the listed number is correct:

<https://www.fisheries.noaa.gov/report>.

For assistance with sea turtles contact the number(s) below:

| <b>Sea Turtles</b>             |                      |
|--------------------------------|----------------------|
| <b>State Stranding Network</b> | <b>Telephone</b>     |
| Texas                          | (361) 949-8173 x 226 |
| Louisiana                      | (844) 732-8785       |
| Mississippi                    | (228) 369-4796       |
| Alabama                        | (866) 732-8878       |
| Florida                        | (888) 404-3922       |

\* Note: If you do not receive a response, go to the following website to ensure the listed number is correct:

<https://www.fisheries.noaa.gov/report>.

Assistance with other ESA listed species (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) should contact the ESA Section 7 biologist at (301) 427-8413 ([nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov)) and report all incidents to [takereport.nmfsser@noaa.gov](mailto:takereport.nmfsser@noaa.gov).

After the appropriate stranding networks have been contacted for assistance, you may contact BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov) for questions or additional guidance on recovery assistance needs (if still required), continued monitoring requirements, and incidental report information which at minimum is detailed below.

Within 24 hours of any event or observation, notify NMFS at [nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov) and BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov) with the following information:

1. Time, date, water depth, and location (latitude/longitude) of the first discovery of the interaction;
2. Name, type, and call sign of the vessel (or platform) in which the event occurred;
3. Species identification (if known) or description of the animal involved;
4. Condition of the animal during the event;
5. Photographs or video footage of the animal;
6. Stranding network line that was contacted for assistance;
7. General narrative and timeline describing the events that took place;

In addition to the measures proposed above and in your plan, the following additional measures are required after consultation with NMFS to ensure compliance with the Biological Opinion:

- Establish an Exclusion Zone of 157 meters and Monitoring Zone of 500 meters. Monitoring by a dedicated observer, which would have no other tasks, must take place from 30 minutes prior to initiation of pile driving activity through 30 minutes post-completion of pile driving activity.
- Initiate and conduct pile driving only during daylight hours, as practicable. Use lights to monitor the exclusion zone during times when visibility is limited due to dark, rain, fog, etc.
- Use soft start techniques when initiating pile driving. Soft start requires the operator to provide an initial set of strikes at reduced energy, followed by a 30 second waiting period, then two subsequent reduced energy strike sets. A soft start must be implemented at the start of each day's pile driving and at any time following cessation of impact pile driving for a period of 30 minutes or longer.
- Delay pile driving if an ESA listed species is observed entering or within the Exclusion Zone within 30 minutes prior to commencement of pile driving. If a delay is called for based on an ESA listed species entering or within the Exclusion Zone, pile driving may not commence until either the animal has voluntarily left and been visually confirmed beyond the Exclusion Zone or 30 minutes have elapsed without subsequent detection.
- Shut down pile driving if an ESA listed species is observed entering or within the Exclusion Zone while pile driving is underway, except when shutdown would jeopardize human safety or the stability of the pile being driven. Pile driving may not commence following shutdown until either the animal has voluntarily left and been visually confirmed beyond the Exclusion Zone or 30 minutes have elapsed without subsequent detection.

- In advance of the pile driving activity, the designated, dedicated observers shall provide an email and/or resume package describing qualifications to BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov) and NMFS at [nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov) for approval in the observer role. Qualifications shall include background experience, training and/or education appropriate for fulfilling the role as an observer of ESA listed species.
- Specifics of the pile driving activity and reasoning for why a shutdown could not occur should be communicated to the observer and reported in the post activity report sent to BSEE and NMFS.
- Report any observations of ESA listed species and report any mitigation actions that were undertaken in response to observations of ESA listed species (i.e., postponing ramp up or shutting down due to presence of ESA listed species in the exclusion zone) to BOEM at [protectedspecies@boem.gov](mailto:protectedspecies@boem.gov) and to NMFS at [nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov) after operations have ceased.

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 Michelle Griffitt Evans at (504) 736-2975

Sincerely,

for   Bernadette Thomas  
Regional Supervisor  
Office of Leasing and Plans