UNITED STATES GOVERNMENT
MEMORANDUM

May 15, 2026

To: Public Information
From: Plan Coordinator, OLP, Plans Section (GM 235D)

Subject: Public Information copy of plan

Control #	-	Control S-8205
Type	-	Supplemental Development Operations Coordination Document
Lease(s)	-	OCS- 00369 Block - 2 Bay Marchand Area OCS- 00386 Block – 23 South Timbalier Area
Operator	-	Cantium, LLC
Description	–	Caisson No. 28 (Complex ID 20475) and Well 024
Rig Type	-	Jackup

Attached is a copy of the subject plan.

It has been deemed submitted and is under review for approval.

Nicole Reaux
Plan Coordinator

PUBLIC COPY
October 8, 2025

SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

Bay Marchand Block 2 / South Timbalier Block 23
OCS 00369 / 00386

Estimated Startup Date: August 1, 2026

SUBMITTED BY:
Cantium, LLC
111 Park Place Drive, Suite 100
Covington, LA 70433

Tom Bergeon
(985) 317-5131
tom.bergeon@cantium.us

AUTHORIZED REPRESENTATIVE:
Dena Rodriguez
J. Connor Consulting, Inc.
19219 Katy Freeway, Suite 200
Houston, Texas 77094
(281) 698-8512
dena.rodriguez@jccteam.com

Record of Changes – PUBLIC COPY
S-8205, Supplemental DOCD, Cantium, LLC, (Leases OCS- 00369 & 00386, BM & ST Blocks 2 & 23)

Date	Section	Page	Remarks
1/19/26	9	17	Update OSRP approval date, comparison table
2/2/26	9	17-18	Update OSRP approval date, comparison chart with new WCD drilling volume, add capability to respond statement; provide updated full copy of plan
3/6/26	1	Attachment 1-A	Update WCD volume from 58,127 BOPD to BOEM's calculation of 168,723 BOPD; update total volume of WCD to 10,123,380 bbls
3/6/26	2.10	4	Update WCD volume from 58,127 BOPD to BOEM's calculation of 168,723 BOPD; update total volume of WCD to 10,123,380 bbls
3/6/26	9.4	17-18	Update WCD volume from 58,127 BOPD to BOEM's calculation of 168,723 BOPD; amend capability to respond statement; will update OSRP with BOEM's volume
5/12/26	9.1, 9.4	17-18	Update OSRP approval date; provide full amended copy

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1-D	Pay.gov Receipt
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17-A	Environmental Impact Analysis (EIA)

SECTION 1
PLAN CONTENTS

1.1 PLAN INFORMATION

By letter dated October 11, 2019, BOEM approved Cantium, LLC's (Cantium) Revised Development Operations Coordination Document (DOCD), Control No. R-6875, which provided for changing the operator and providing for future emissions for Bay Marchand Block 2 Platform CG and Caisson Nos. 23 and 28 and associated wells on these structures.

Under this Supplemental DOCD, Cantium proposes to install two strap-on conductors to Caisson No. 28 and drill, complete, and produce one well (proposed Well No. 024) from Caisson No. 28 with a bottomhole location in South Timbalier Block 23, Lease OCS 00386. These development operations are in approximately 47 feet of water. The well will be drilled with a jackup MODU.

The proposed operations will be driving pipe. Cantium will drive one 20-24" drive pipe with a D90 impact hammer working dry to a depth of +/-230'. It is expected to take 5,500 strikes to set the drive pipe. Footage penetrated will be limited, not measured at strike per foot. Driving activities are expected to last 2 days at 18 hours per day. The drive pipe will be driven through layers of primarily marine sands, silts and clays. Sound attenuation will not be utilized.

Cantium is not proposing any new pipelines expected to make landfall.

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

1.2 LOCATION

A Well Location Plat depicting the surface location of the proposed well and water depth is included as **Attachment 1-B**. No anchors are associated with the activities proposed in this plan. A structural schematic is included as **Attachment 1-C**.

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)	MODU	1,092	2	2,184	32.4°
Production	MODU	25	2	50	26°

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

Cantium 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 $5,565.00 cost recovery fee payment is included as **Attachment 1-D.**

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

Attachment 1-A

OMB Control Number: 1010-0151
OMB Approval Expires: 10/31/2027

OCS PLAN INFORMATION FORM

General Information

Type of OCS Plan:		Exploration Plan (EP)	X	Development Operations Coordination Document (DOCD)	
Company Name: Cantium, LLC				BOEM Operator Number: 03481	
Address: 111 Park Place Drive, Suite 100				Contact Person: Dena Rodriguez	
Covington, LA 70433				Phone Number: 281-698-8512	
				E-Mail Address: dena.rodriguez@jccteam.com	
If a service fee is required under 30 CFR 550.125(a), provide the		Amount paid	$5,565.00	Receipt No.	27QN3PG4

Project and Worst-Case Discharge (WCD) Information

Leases: OCS 00386 (BHL) / OCS 00369 (SL)			Areas: South Timbalier / Bay Marchand				Blocks: 23 / 2		Project Name (If Applicable): N/A
Objective(s)	X	Oil	X	Gas		Sulphur		Salt	Onshore Support Base(s): Venice, LA
Platform / Well Name: 024				Total Volume of WCD: 10,123,380 bbls					API Gravity: 38°
Distance to Closest Land (Miles): 4.5				Volume from uncontrolled blowout: 168,723 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
Installation of conductors	08/01/2026	08/02/2026	2
Drill, Complete, Commence Production – Well No. 024	08/03/2026	09/12/2026	41
Production - Well No. 024	09/13/2026	09/13/2036	10 years reserve life
Future Well Activities - Well No. 024	01/01/2027	12/31/2037	100 days/year

Description of Drilling Rig

X	Jackup		Drillship				
	Gorilla Jackup		Platform rig				
	Semisubmersible		Submersible				
	DP Semisubmersible		Other (Attach description)				
Drilling Rig Name (If known):							

Description of Structure

X	Caisson		Tension leg platform
	Fixed platform		Compliant tower
	Spar		Guyed tower
	Floating production system		Other (Attach description)

Description of Lease Term Pipelines

From (Facility/Area/Block)	To (Facility/Area/Block)	Diameter (Inches)	Length (Feet)
N/A	N/A	N/A	N/A

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): Caisson 28					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.	20475			
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): 168,723	For structures, volume of all storage and pipelines (Bbls): 0	API Gravity of fluid	38°

	Surface Location	**Bottom-Hole Location (For Wells)**	**Completion (For multiple completions, enter separate lines)**
Lease No.	OCS 00369		OCS OCS
Area Name	Bay Marchand		
Block No.	2		
Blockline Departures (in feet)	N/S Departure: 4,788’ FSL	N/S Departure:	N/S Departure F __ L N/S Departure F __ L N/S Departure F __ L
	E/W Departure: 1,689’ FWL	E/W Departure:	E/W Departure F __ L E/W Departure F __ L E/W Departure F __ L
Lambert X-Y coordinates	X: 2,376,466	X:	X: X: X:
	Y: 139,118	Y:	Y: Y: Y:
Latitude/ Longitude	Latitude: 29° 2’ 37.986” N	Latitude:	Latitude Latitude Latitude
	Longitude: 90° 9’ 14.2452” W	Longitude:	Longitude Longitude Longitude

Water Depth (Feet): 50’	MD (Feet):	TVD (Feet):	MD (Feet): MD (Feet): MD (Feet):	TVD (Feet): TVD (Feet): TVD (Feet):
Anchor Radius (if applicable) in feet: N/A				

Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)

Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor
			X:	Y:	
			X:	Y:	
			X:	Y:	
			X:	Y:	
			X:	Y:	
			X:	Y:	
			X:	Y:	
			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): 024					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	

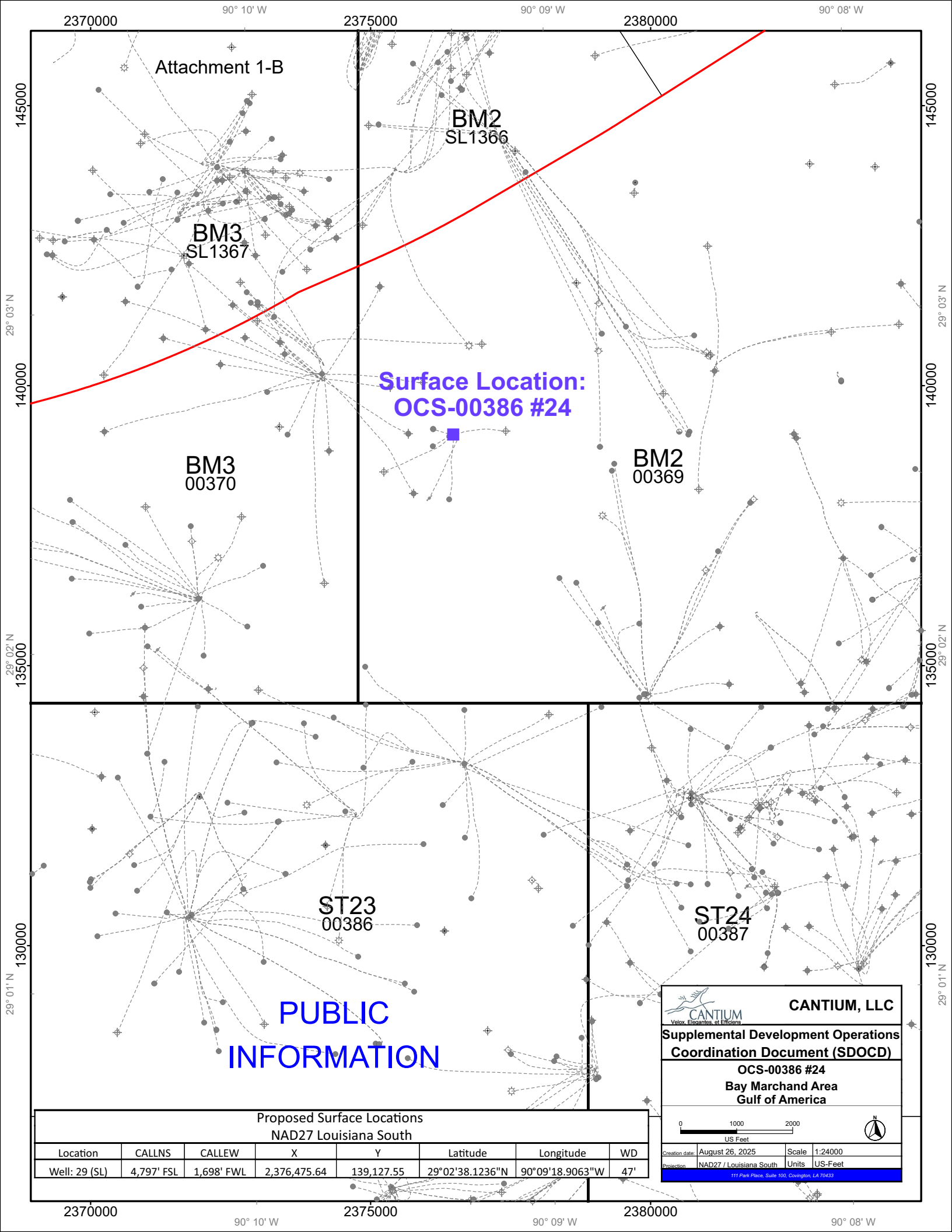
WCD Info	For wells, volume of uncontrolled blowout (Bbls/Day): 168,723	For structures, volume of all storage and pipelines (Bbls): 0	API Gravity of fluid	38°

	Surface Location	**Bottom-Hole Location (For Wells)**	**Completion (For multiple completions, enter separate lines)**
Lease No.	OCS 00369	OCS 00386	
Area Name	Bay Marchand	South Timbalier	
Block No.	2	23	
Blockline Departures (in feet)	N/S Departure: 4,797’ FSL	N/S Departure:	N/S Departure:
	E/W Departure: 1,698’ FWL	E/W Departure:	E/W Departure:
Lambert X-Y coordinates	X: 2,376,475.64	X:	X:
	Y: 139,127.55	Y:	Y:
Latitude/ Longitude	Latitude: 29° 02’ 38.1236” N	Latitude:	Latitude:
	Longitude: 90° 09’ 18.9063” W	Longitude:	Longitude:

Water Depth (Feet): 47’	MD (Feet):	TVD (Feet):	MD (Feet):	TVD (Feet):
Anchor Radius (if applicable) in feet: N/A				

Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)

Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor
			X:	Y:	
			X:	Y:	
			X:	Y:	
			X:	Y:	
			X:	Y:	
			X:	Y:	



Proposed Surface Locations NAD27 Louisiana South							
Location	CALLNS	CALLEW	X	Y	Latitude	Longitude	WD
Well: 29 (SL)	4,797' FSL	1,698' FWL	2,376,475.64	139,127.55	29°02'38.1236"N	90°09'18.9063"W	47'

CANTIUM, LLC

CANTIUM
Velox, Elegantes, et Efficiens

Supplemental Development Operations Coordination Document (SDOCD)

OCS-00386 #24
Bay Marchand Area
Gulf of America

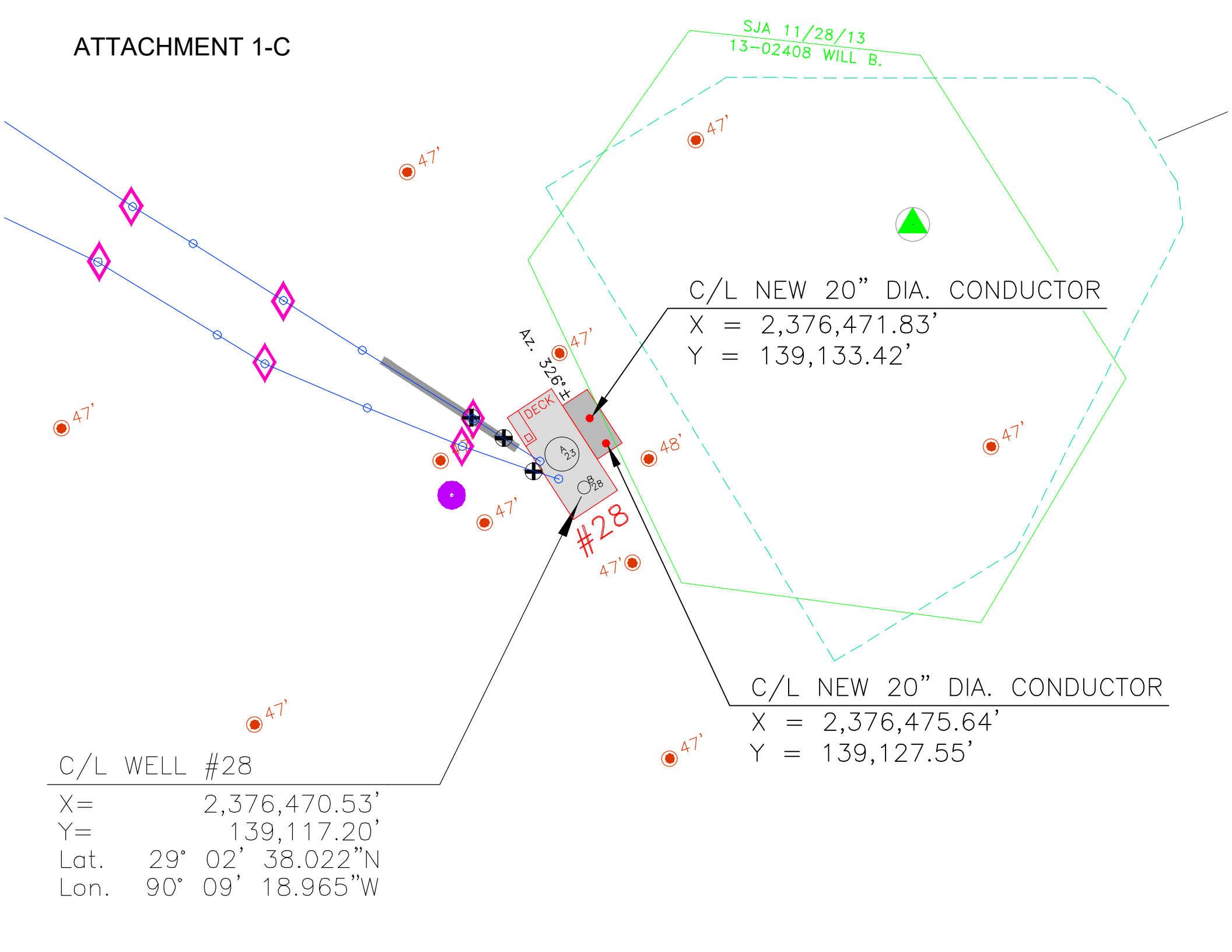
0 1000 2000
US Feet

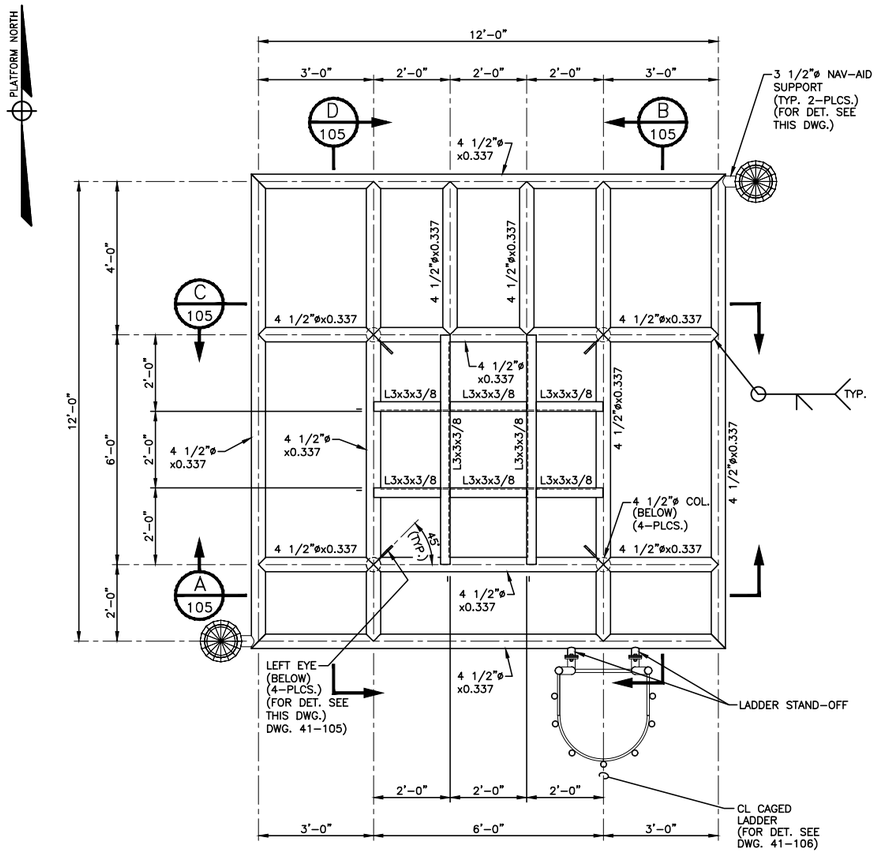
N

Creation date:	August 26, 2025	Scale	1:24000
Projection	NAD27 / Louisiana South	Units	US-Feet

111 Park Place, Suite 100, Covington, LA 70433

ATTACHMENT 1-C



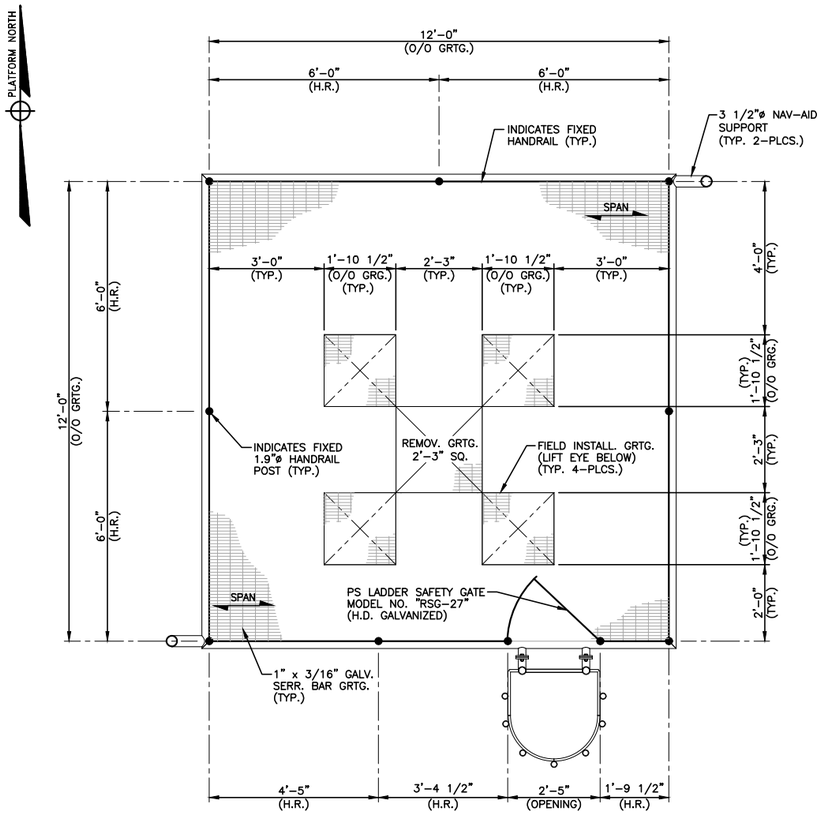


(ALL MEMBERS TOP FLUSH U.N.O.)

NAV-AID TOWER FRAMING PLAN

CL 4 1/2"ø PIPE EL.(+) 33'-0"

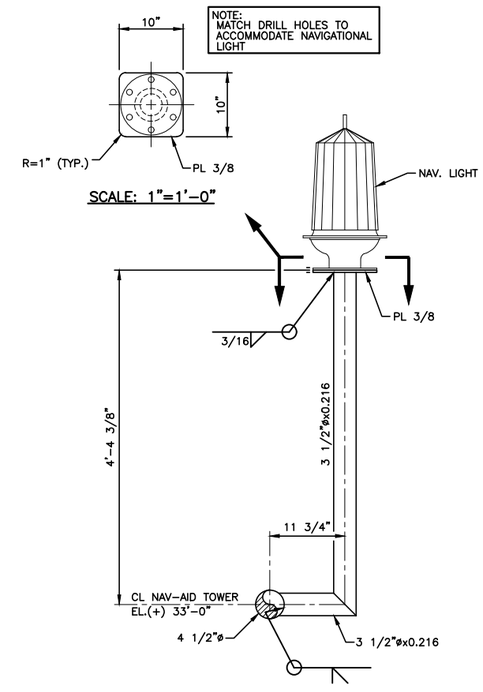
SCALE: 1/2"=1'-0"



NAV-AID TOWER HANDRAIL AND GRATING PLAN

T.O.GRTG. EL.(+) 33'-3 1/4"

SCALE: 1/2"=1'-0"



(2-REQ'D)

NAVIGATION LIGHT SUPPORT

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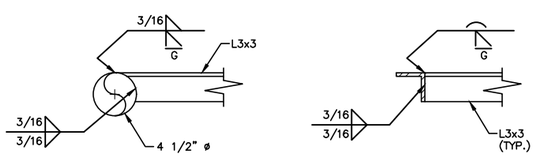
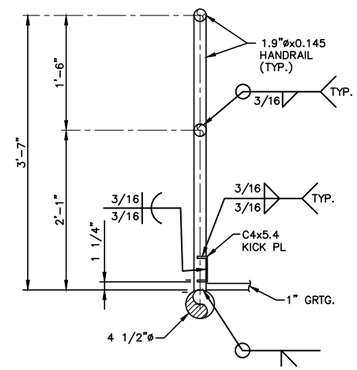


TYPICAL WELD DETAILS

SCALE: 1 1/2" = 1'-0"



TYPICAL FIXED HANDRAIL DETAIL

SCALE: 1"=1'-0"

STATE OF LOUISIANA
CRAIG J. FUSELIER
License No. 31050
PROFESSIONAL ENGINEER
IN
CIVIL ENGINEERING
07/28/25

28 JULY 2025

APPROVED FOR CONSTRUCTION

NOTE:
1. SEE DWG. NO. BM2#28-11361-00-001 FOR DRAWING INDEX AND GENERAL NOTES.

REV.	DESCRIPTION	BY	CHK'D	APP'D	DATE
0	APPROVED FOR CONSTRUCTION	BJG	CJF	CJF	07/28/25

EDG, INC.

CLIENT		
APPROVED	CJF	07/24/25
CHECKED	CJF	07/24/25
DRAWN	BJG	07/07/25

CANTIUM

BAY MARCHAND BLK 2 OCS 00369 HAWKHURST
WELLS #29/#30 CODUCTOR ADDITIONS
NAV-AID TOWER FRAMING PLAN
HANDRAIL AND GRATING PLAN AND DETAILS

JOB NO. 11361.001 | DWG. NO. BM2#28-11361-41-104 | 0

ATTACHMENT 1-D

MENU

For your security, we recommend you close your browser when you complete your payment.

Payment Confirmation - BOEM Development Operations Coordination Document or DPP

Before You Begin ✓ | Complete Agency Form ✓ | Enter Payment Info ✓ | Review & Submit ✓ | **5 Confirmation**

Your payment is complete

You will not be able to access this receipt once you leave this page. A confirmation email has been sent to sheri.merrell@cantium.us.

Because you are not signed in:

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To confirm your payment went through:

Contact the federal government agency you paid. Pay.gov is unable to cancel this transaction.

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Tracking Information

Pay.gov Tracking ID: 27QN3PG4

Agency Tracking ID: 77132388748

Form Name: BOEM Development Operations Coordination Document or DPP

Application Name: BOEM Development/DOCD Plan - BD

Payment Information

Payment Type: Debit or credit card

Payment Amount: $5,565.00

Transaction Date: 08/20/2025 10:03:43 AM EDT

Payment Date: 08/20/2025

Region: Gulf of America

Contact: Sheri Merrell (504) 256-3602

Company Name/No: Cantium, LLC, 03481

Lease Number(s): 00369, 00386

Area-Block: Bay Marchand BM, 2: South Timbalier ST, 23

Type-Wells: Initial Plan, 1

Account Information

Cardholder Name: Kelly Perrier

Card Type: Visa

Card Number: **********1729

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Need Help?

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
Application For Permit to Drill	BSEE	To Be Submitted
Application For Permit to Modify	BSEE	To Be Submitted
Structure Modification Application	BSEE	To Be Submitted
Surface Safety System	BSEE	To Be Submitted

2.2 DRILLING FLUIDS

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

Type of Drilling Fluid	Estimated Volume of Drilling Fluid to be Used per Well (bbl)
Water-based (seawater, freshwater, barite)	2,500
Oil-based (diesel, mineral oil)	5,000
Synthetic-based (internal olefin, ester)	N/A

The major components of each oil-based drilling fluid are provided in the table below.

Product Name	Amount to be Used (bbl)	Reference Number
MEGADRIL SYSTEM	5,000	12941

A Safety Data Sheet (SDS) for each oil-based drilling fluid is included as **Attachment 2-A**.

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)

Cantium, LLC (Company No. 03481) 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

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

2.10 BLOWOUT SCENARIO AND WORST-CASE DISCHARGE CALCULATIONS

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 following information is provided:

The Worst-Case Discharge is defined as an uncontrolled blowout through the drilling string during drilling operations.

Estimated initial flow rate: The calculated Worst Case Discharge estimate for Bay Marchand Block 2 (SL) / South Timbalier Block 23 (BHL) Well No. 024 is 168,723 bbls of crude.

Maximum duration/total volume that could occur if the Bay Marchand Block 2 (SL) / South Timbalier Block 23 (BHL) Well No. 024 sustained a blowout:

Scenario	Maximum Discharge Rate (bbl/day)	Discharge Duration (days)	Total Volume Crude (bbl)
Relief Well	168,723	60	10,123,380

Potential of wellbore to bridge over during a blowout: Due to the unconsolidated nature of the sand quality of the proposed target reservoir, the potential for the well to bridge over is very high within the first 5-10 days of a loss of control incident. The planned casing program exits existing casing at a depth where fracture gradient is high enough to hold in the event the wellbore has been fully evacuated with gas. The pressure trend is over-pressure. Drilling techniques would likely experience an underground blowout as the path of least resistance preceded by bridging in the wellbore.

Likelihood for surface intervention to stop blowout: Most successful well kill operations are conducted via surface intervention by trained well control specialists. In the event of an actual blowout, intervention at the surface will be guided by well control specialists from Wild Well Control. The jack-up rig style offers good access to surface well control equipment for surface intervention.

Relief Well

Rig type capable of drilling relief well at water depth and to TD: The type of rig necessary to drill in water depths up to 50' would be either a mat jack-up or an independent leg rig. There are approximately 4 units of this type available in the Gulf of America fleet. A relief well rig can be placed a safe distance from the affected rig and still reach intercept depths needed. Rigs we can use to drill a relief well are WFD #300, WFD #350, Enterprise 351, and Enterprise 205.

Rig package constraints: Some rigs may be restricted during hurricane season, but there are several rigs available that are not restricted.

Time to acquire rig, move onsite and drill relief well:

Activity	Duration (days)
Assess the situation and obtain the optimum MODU; Secure the well at current location of MODU	15
Mobilization time to relief well location	5
Drill the relief well, intersect, and kill the well	40
Total anticipated time	60

Statement whether possibility of using nearby platform was considered: Yes, but to reduce drill time with an easier approach, an open water location 500'-1000' away is a better option using an independent-leg type rig.

Other measures to enhance ability to prevent a blowout: All targets are in the normal trend pressure profile. The fracture gradient of the window shoe is designed to be strong enough to allow for shut-in of the wellbore with 80% gas evacuation. In Bay Marchand, any open hole wellbore influx would also include contributions from significant, exposed water sands, so in a blowout scenario, there would always be a large volume of fluids associated with the flow stream. Cantium will adhere to and conduct all operations in compliance with all regulations. This would include, but not be limited to:

- Sufficient mud weight margin can be maintained without mud losses.
- Test and certify BOPs with proper working pressure.
- Maintain enough barite on location to weight up the mud system 0.5 ppg.
- Properly test TIW and BOP on rig floor.
- Monitor trip speeds to minimize surge and swab pressures.
- Check well for flow regularly especially following drilling breaks.
- Rig up and function test gas detectors properly.
- Earnestly conduct well control drills with each crew.
- Thoroughly review offset information to identify drilling hazards.
- Drilling information will be available for real-time display and reviewed by office engineers and rig superintendents via a company like OFI. Drilling information will be

available for monitoring 24/7 with geoscience team for accurate pore pressure analysis via OFI along with real time Baker LWD transmission.

Measures to reduce the likelihood of a blowout:

- Perform offset-well history review. Most wells are drilled in known fields with established pressure profiles.
- Create proper mud design and maintain MW to control well as per the offset information.
- Design and maintain in proper functioning order the atmospheric degasser.
- Maintain stuck pipe spotting material on location.
- Maintain enough LCM material on location to mix two pills.
- Monitor pressures while making preparations to circulate the invading fluids out of the wellbore and regain hydrostatic pressure control of the formation pressure, should the well need to be shut it.
- Run cement bond logs where applicable.
- Make routine short trips when warranted.
- Circulate bottoms up frequently.
- Run centralizers by normally accepted practices where applicable.
- Model cement jobs and drilling fluid hydraulics for rate and ecd effects.

Measures to enhance ability to conduct effective and early intervention in event of a blowout:

- Minimize the impact of an event by having well trained personnel at the well site.
- Be sure drillers understand it is always acceptable to shut-in a well to evaluate well conditions at any time.
- Make initial contact with surface intervention specialist.
- Perform hazard assessment and operations assessment to establish path forward.
- Set up firefighting equipment of vessels.
- Begin firewater application to cool the area or to prevent ignition while working in proximity to flow.
- Clear debris and move onto the rig.
- Cut off damaged wellhead and BOPs.
- Install new wellhead.
- Install diverter and capping stack.
- Rig up snubbing unit.
- Snub in and kill well.

Arrangements for drilling relief wells:

- Maintain awareness of the location of other rigs working in the Gulf Shelf.
- Build relations with other operators in the Shelf, like Arena, who also support an active drilling program.
- The company that is providing the rig for the project has 1 additional rig at our call

- Other shelf operators understand we would seek the most readily and capable rig to respond and would work with other Operators as needed to make them available.
- The type of rig necessary to drill in water depths of 50’ is either an independent leg jack-up rig or mat jack-up.
- There are approximately 4 rigs working on the shelf that are available in the Gulf of Mexico fleet.

Any other measures: N/A

SDS no. 12941
Version 3
Revision date 02/Jan/2015
Supersedes date 04/Sep/2014

Safety Data Sheet
MEGADRIL† SYSTEM

1. Identification

1.1 Product identifier

Product name MEGADRIL† SYSTEM

Product code 12941

1.2 Relevant identified uses of the substance or mixture and uses advised against

Recommended Use Drilling fluid system.

Uses advised against Consumer use

1.3 Details of the supplier of the safety data sheet

Supplier
M-I L.L.C.

P.O.Box 42842
Houston, TX 77242
www.miswaco.slb.com
Telephone: 1 281-561-1511

Prepared by
Global Regulatory Compliance - Chemicals (GRC - Chemicals) , Bethicia Prasek

1.4 Emergency Telephone Number

Emergency telephone (24 Hour) Australia +61 2801 44558, Asia Pacific +65 3158 1074, China +86 10 5100 3039, Europe +44 (0) 1235 239 670, Middle East and Africa +44 (0) 1235 239 671, New Zealand +64 9929 1483, USA 001 281 561 1600

2. Hazards identification

2.1 Classification of the substance or mixture

GHS - Classification

Health hazards

Acute oral toxicity	Category 4
Acute inhalation toxicity - dust/mist	Category 4
Skin sensitization	Sub-Category 1A
Carcinogenicity	Category 1A

Environmental hazards

Chronic aquatic toxicity	Category 3

Physical Hazards

Flammable Liquids	Category 4

2.2 Label elements

Signal word
DANGER

Hazard statements
H302 - Harmful if swallowed
H317 - May cause an allergic skin reaction
H332 - Harmful if inhaled
H350 - May cause cancer
H412 - Harmful to aquatic life with long lasting effects

Precautionary statements
P201 - Obtain special instructions before use
P210 - Keep away from heat/sparks/open flames/hot surfaces. - No smoking
P280 - Wear protective gloves/protective clothing and eye/face protection
P281 - Use personal protective equipment as required
P308 + P313 - IF exposed or concerned: Get medical advice/ attention
P370 + P378 - In case of fire: Use dry sand, dry chemical or alcohol-resistant foam for extinction
P403 + P235 - Store in a well-ventilated place. Keep cool

Supplementary precautionary statements
P202 - Do not handle until all safety precautions have been read and understood
P261 - Avoid breathing dust/ fume/ gas/ mist/ vapors/ spray
P264 - Wash face, hands and any exposed skin thoroughly after handling
P270 - Do not eat, drink or smoke when using this product
P271 - Use only outdoors or in a well-ventilated area
P272 - Contaminated work clothing should not be allowed out of the workplace
P273 - Avoid release to the environment
P301 + P312 - IF SWALLOWED: Call a POISON CENTER or doctor/ physician if you feel unwell
P302 + P352 - IF ON SKIN: Wash with plenty of soap and water
P303 + P361 + P353 - IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.
P304 + P340 - IF INHALED: Remove to fresh air and keep at rest in a position comfortable for breathing
P312 - Call a POISON CENTER or doctor/physician if you feel unwell
P321 - Specific treatment (see supplemental first aid instructions on this label)
P330 - Rinse mouth
P333 + P313 - If skin irritation or rash occurs: Get medical advice/ attention
P363 - Wash contaminated clothing before reuse
P332 + P313 - If skin irritation occurs: Get medical advice/ attention
P501 - Dispose of contents/ container to an approved waste disposal plant

Unknown acute toxicity 5.3% of the mixture consists of ingredient(s) of unknown toxicity.

3. Composition/information on Ingredients

3.1 Substances

Not Applicable

3.2 Mixtures

Component	CAS-No	Weight % - range
Diesel oil, petroleum distillates	68476-34-6	60 - 100
Barite	7727-43-7	30 - 60
Calcium chloride	10043-52-4	5 - 10
Calcium hydroxide	1305-62-0	1 - 5
Fatty acids, tall-oil, reaction products with diethylenetriamine, maleic anhydride, tetraethylenepentamine and triethylenetetramine	68990-47-6	1 - 5
Silica, crystalline, quartz	14808-60-7	1 - 5
Bentonite	1302-78-9	1 - 5
Mica	12001-26-2	1 - 5
Tall oil	8002-26-4	1 - 5

Comments
Drilling fluid is a highly complex and variable blend of several proprietary products. Each drilling fluid is designed to meet the drilling requirements of a specific well. During the drilling process the composition and physical properties of the drilling fluid are constantly changing; therefore, a complete disclosure of a particular fluid's composition is impractical.

4. First aid measures

4.1 First-Aid Measures

Inhalation Move to fresh air. If breathing is difficult, (trained personnel should) give oxygen. If not breathing, give artificial respiration. Get medical attention immediately if symptoms occur.

Ingestion Do not induce vomiting. If conscious, give 2 glasses of water. Get immediate medical attention.

Skin contact Wash skin thoroughly with soap and water. Remove contaminated clothing and shoes. Get medical attention if irritation persists.

Eye contact Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye.

4.2 Most important symptoms and effects, both acute and delayed

Main symptoms

Inhalation Please see Section 11. Toxicological Information for further information.

Ingestion Please see Section 11. Toxicological Information for further information.

Skin contact Please see Section 11. Toxicological Information for further information.

Eye contact Please see Section 11. Toxicological Information for further information.

4.3 Indication of any immediate medical attention and special treatment needed

Notes to physician Treat symptomatically

5. Fire-fighting measures

5.1 Extinguishing media

Suitable extinguishing media
Water Fog, Alcohol Foam, CO_2, Dry Chemical.

Extinguishing media which shall not be used for safety reasons
None known.

5.2 Special hazards arising from the substance or mixture

Unusual fire and explosion hazards
Most vapors are heavier than air. They will spread along ground and collect in low or confined areas (sewers, basements, tanks). Vapors may form explosive mixtures with air.

Hazardous combustion products
Carbon oxides (COx), Nitrogen oxides (NOx).

5.3 Advice for firefighters

Special protective equipment for fire-fighters
As in any fire, wear self-contained breathing apparatus and full protective gear.

6. Accidental release measures

6.1 Personal precautions, protective equipment and emergency procedures

Extinguish all ignition sources. Avoid sparks, flames, heat and smoking. Evacuate personnel to safe areas. Use personal protective equipment. If spilled, take caution, as material can cause surfaces to become very slippery.

6.2 Environmental precautions

Do not allow spilled material to enter sewers, storm drains or surface waters.

Environmental exposure controls
No information available.

6.3 Methods and materials for containment and cleaning up

Methods for cleaning up
Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Use clean non-sparking tools to collect absorbed material. Sweep up and shovel into suitable containers for disposal.

6.4 Reference to other sections

No information available.

7. Handling and storage

7.1 Precautions for safe handling

Handling
Keep away from heat, sparks and open flame. No smoking. Avoid breathing vapors or mists. Avoid contact with skin, eyes and clothing.

7.2 Conditions for safe storage, including any incompatibilities

Technical measures/precautions Ensure adequate ventilation.

Storage precautions Keep away from open flames, hot surfaces and sources of ignition. Keep container/package tightly closed and in a well-ventilated place. Follow safe warehousing practices regarding palletizing, banding, shrink-wrapping and/or stacking.

8. Exposure controls/personal protection

8.1 Control parameters

Component	ACGIH TLV	OSHA PEL
Diesel oil, petroleum distillates	100 mg/m³	Not Determined
Barite	10 mg/m³	15 mg/m³ (total); 5 mg/m³ (resp)
Calcium chloride	Not Determined	Not Determined
Calcium hydroxide	5 mg/m³	5 mg/m³ (resp); 15 mg/m³ (total)
Fatty acids, tall-oil, reaction products with diethylenetriamine, maleic anhydride, tetraethylenepentamine and triethylenetetramine	Not Determined	Not Determined
Silica, crystalline, quartz	0.025 mg/m³	see Table Z-3
Bentonite	Not Determined	Not Determined
Mica	3 mg/m³ (resp)	20 mppcf (<1% crystalline silica). See Table Z-3.
Tall oil	Not Determined	Not Determined

Silica, crystalline, quartz
OSHA - Final PELs - Table Z-3 Mineral Dusts
(30)/(%SiO2 + 2) mg/m³ TWA, total dust; (250)/(%SiO2 + 5) mppcf TWA, respirable fraction; (10)/(%SiO2 + 2) mg/m³ TWA, respirable fraction
Mica
OSHA - Final PELs - Table Z-3 Mineral Dusts
20 mppcf TWA (<1% Crystalline silica)

8.2 Exposure controls

All chemical Personal Protective Equipment (PPE) should be selected based on an assessment of both the chemical hazard present and the risk of exposure to those hazards. The PPE recommendations below are based on an assessment of the chemical hazards associated with this product. Where this product is used in a mixture with other products or fluids, additional hazards may be created and as such further assessment of risk may be required. The risk of exposure and need of respiratory protection will vary from workplace to workplace and should be assessed by the user in each situation.

Engineering measures to reduce exposure
Ensure adequate ventilation, especially in confined areas.

Personal protective equipment

Eye protection Tightly fitting safety goggles.

Hand protection Wear chemical resistant gloves such as nitrile or neoprene.

Respiratory protection All respiratory protection equipment should be used within a comprehensive respiratory protection program that meets the requirements of 29 CFR 1910.134 (U.S. OSHA Respiratory Protection Standard) or local equivalent.If exposed to airborne mist/aerosol of this product, use an organic vapor cartridge with a P-95 pre-filter attached. In work environments containing oil mist/aerosol, use an organic vapor cartridge with a P-95 pre-filter attached.If exposed to vapors from this product, use a NIOSH/MSHA-approved respirator with an organic vapor cartridge.

Skin and body protection Wear appropriate personal protective clothing to prevent skin contact.

9. Physical and chemical properties

9.1 Information on basic physical and chemical properties

Physical state	Liquid
Appearance	Transparent
Color	Light brown - Brown
Odor	Hydrocarbon-like
Odor threshold	Not applicable

Property	**Values**	**Remarks**
pH	Not applicable	
pH @ dilution		
Melting/freezing point		
Boiling point/range	No information available	
Flash point	>= 71 °C / 160 °F	PMCC
Evaporation rate (BuAc =1)	No information available	
Flammability (solid, gas)	Not Applicable	
Flammability Limits in Air		
Upper flammability limit	No information available	
Lower flammability limit	No information available	
Vapor pressure	No information available	
Vapor density	>1 @ Air = 1	
Specific gravity	No information available	
Bulk density	No information available	
Water solubility	Negligible	
Solubility in other solvents	No information available	
Autoignition temperature	No information available	
Decomposition temperature	No information available	
Kinematic viscosity	No information available	
Dynamic viscosity	No information available	
Log Pow	No information available	
Explosive properties	No information available	
Oxidizing properties	No information available	

9.2 Other information

Pour point	No information available
Molecular weight	No information available
VOC content(%)	No information available
Density	No information available

10. Stability and reactivity

10.1 Reactivity

No specific reactivity hazards associated with this product.

10.2 Chemical stability

Stable under normal temperature conditions and recommended use.

10.3 Possibility of Hazardous Reactions

Hazardous polymerization
Hazardous polymerization does not occur.

10.4 Conditions to avoid

Keep away from sources of ignition - No smoking.

10.5 Incompatible materials

Strong oxidizing agents.

10.6 Hazardous decomposition products

Carbon oxides (COx). Nitrogen oxides (NOx).

11. Toxicological information

11.1 Information on toxicological effects

Acute toxicity

Inhalation May cause irritation of respiratory tract. Vapors inhaled in high concentration have a narcotic effect on the central nervous system. Symptoms of overexposure are dizziness, headache, tiredness, nausea, unconsciousness, cessation of breathing.

Eye contact Severely irritating to eyes.

Skin contact Causes skin irritation. Prolonged skin contact may defat the skin and produce dermatitis. May cause an allergic skin reaction.

Ingestion Ingestion causes irritation of upper respiratory system and gastrointestinal disturbance.

Component	LD50 Oral	LD50 Dermal	LC50 Inhalation
Diesel oil, petroleum distillates	No data available	No data available	No data available
Barite	No data available	No data available	No data available
Calcium chloride	= 1000 mg/kg (Rat)	= 2630 mg/kg (Rat)	No data available
Calcium hydroxide	= 7340 mg/kg (Rat)	No data available	No data available
Fatty acids, tall-oil, reaction products with diethylenetriamine, maleic anhydride, tetraethylenepentamine and triethylenetetramine	No data available	No data available	No data available
Silica, crystalline, quartz	= 500 mg/kg (Rat)	No data available	No data available
Bentonite	> 5000 mg/kg (Rat)	No data available	No data available
Mica	No data available	No data available	No data available
Tall oil	= 7600 mg/kg (Rat)	No data available	No data available

Component	IARC Group 1 or 2	ACGIH - Carcinogens	OSHA listed carcinogens	NTP
Diesel oil, petroleum distillates	No data available	A3 Confirmed Animal Carcinogen with Unknown Relevance to Humans	No data available	No data available
Barite	No data available	No data available	No data available	No data available
Calcium chloride	No data available	No data available	No data available	No data available
Calcium hydroxide	No data available	No data available	No data available	No data available
Fatty acids, tall-oil, reaction products with diethylenetriamine, maleic anhydride, tetraethylenepentamine and triethylenetetramine	No data available	No data available	No data available	No data available
Silica, crystalline, quartz	Group 1; Monograph 100C [in preparation] Group 1; Monograph 68 [1997] Monograph 100C [in preparation] (listed under Crystalline silica inhaled in the form of quartz or cristobalite from occupational sources); Monograph 68 [1997]	A2 Suspected Human Carcinogen	Present	Known Human Carcinogen

Bentonite	No data available	No data available	No data available	No data available
Mica	No data available	No data available	No data available	No data available
Tall oil	No data available	No data available	No data available	No data available

Sensitization May cause sensitization by skin contact.

Mutagenic effects No evidence of mutagenic properties.

Carcinogenicity Contains a known or suspected carcinogen.

Reproductive toxicity No evidence of toxicity to reproduction.

Developmental toxicity Not known to cause birth defects or have a deleterious effect on a developing fetus.

Routes of exposure Inhalation. Skin contact. Eye contact.

Routes of entry Inhalation. Skin absorption.

Specific target organ toxicity (single exposure) Not classified

Specific target organ toxicity (repeated exposure) Not classified.

Neurological effects Central Nervous System Depression: signs/symptoms can include headache, dizziness, drowsiness, muscular weakness, incoordination, slowed reaction time, fatigue blurred vision, slurred speech, giddiness, tremors and convulsions.

Target organ effects Central nervous system. Immune system.

Aspiration hazard Not Applicable.

12. Ecological information

12.1 Toxicity

Toxicity to algae
See component information below.

Toxicity to fish
See component information below.

Toxicity to daphnia and other aquatic invertebrates
See component information below.

Component	Toxicity to fish	Toxicity to algae	Toxicity to daphnia and other aquatic invertebrates
Diesel oil, petroleum distillates 68476-34-6 (60 - 100)	35 mg/L LC50 (Pimephales promelas) = 96 h	No information available	No information available
Barite 7727-43-7 (30 - 60)	No information available	No information available	No information available
Calcium chloride 10043-52-4 (5 - 10)	10650 mg/L LC50 (Lepomis macrochirus) = 96 h	No information available	52 mg/L EC50 (Daphnia magna) = 48 h
Calcium hydroxide 1305-62-0 (1 - 5)	160 mg/L LC50 (Gambusia affinis) = 96 h	No information available	No information available

Fatty acids, tall-oil, reaction products with diethylenetriamine, maleic anhydride, tetraethylenepentamine and triethylenetetramine 68990-47-6 (1 - 5)	No information available	No information available	No information available
Silica, crystalline, quartz 14808-60-7 (1 - 5)	No information available	No information available	No information available
Bentonite 1302-78-9 (1 - 5)	19000 mg/L LC50 (Oncorhynchus mykiss) = 96 h 8.0 - 19.0 g/L LC50 (Salmo gairdneri) = 96 h	No information available	No information available
Mica 12001-26-2 (1 - 5)	No information available	No information available	No information available
Tall oil 8002-26-4 (1 - 5)	5.0 - 10.0 mg/L LC50 (Brachydanio rerio) = 96 h	0.87 mg/L EC50 (Pseudokirchneriella subcapitata) = 72 h	39.7 mg/L EC50 (Daphnia magna) = 48 h

12.2 Persistence and degradability

No product level data available.

12.3 Bioaccumulative potential

No product level data available.

12.4 Mobility in soil

No information available.

12.5 Results of PBT and vPvB assessment

This preparation contains no substance considered to be persistent, bioaccumulating nor toxic (PBT)
This preparation contains no substance considered to be very persistent nor very bioaccumulating (vPvB)

12.6 Other adverse effects.

None known.

13. Disposal considerations

13.1 Waste treatment methods

Disposal Method Disposal should be made in accordance with federal, state and local regulations.

Contaminated packaging If recycling is not practicable, dispose of in compliance with local regulations.

14. Transport information

14.1 UN Number

UN No. (DOT) NA1993
UN No. (TDG) Not regulated
UN/ID No. (ADR/RID/ADN/ADG) Not regulated
UN No. (IMDG) Not regulated
UN No. (ICAO) Not regulated

14.2 Proper shipping name
Combustible liquid, n.o.s., (contains diesel), Not regulated for U.S. ground transport in non-bulk containers (<119 gallons).

14.3 Hazard class(es)

DOT Hazard class	Combustible liquid
TDG Hazard class	Not regulated
ADR/RID/ADN/ADG Hazard class	Not regulated
IMDG Hazard class	Not regulated
ICAO Hazard class/division	Not regulated

14.4 Packing group

DOT Packing group	III
TDG Packing group	Not regulated
ADR/RID/ADN/ADG Packing group	Not regulated
IMDG Packing group	Not regulated
ICAO Packing group	Not regulated

14.5 Environmental hazard
No
Marine pollutant No

14.6 Special precautions
Not Applicable

15. Regulatory information

International inventories

USA (TSCA)	Complies
Canada (DSL)	Complies
European Union (EINECS and ELINCS)	Does not Comply
Philippines (PICCS)	Does not Comply
Japan (ENCS)	Does not Comply
China (IECSC)	Does not Comply
Australia (AICS)	Does not Comply
Korean (KECL)	Does not Comply
New Zealand (NZIoC)	Does not Comply

U.S. Federal and State Regulations

SARA 311/312 Hazard Categories
Fire hazard. Immediate (acute) health hazard. Delayed (chronic) health hazard.

Component	SARA 302 / TPQs	SARA 313	CERCLA RQ
Diesel oil, petroleum distillates	N/A	N/A	N/A
Barite	N/A	N/A	N/A
Calcium chloride	N/A	N/A	N/A
Calcium hydroxide	N/A	N/A	N/A

Fatty acids, tall-oil, reaction products with diethylenetriamine, maleic anhydride, tetraethylenepentamine and triethylenetetramine	N/A	N/A	N/A
Silica, crystalline, quartz	N/A	N/A	N/A
Bentonite	N/A	N/A	N/A
Mica	N/A	N/A	N/A
Tall oil	N/A	N/A	N/A

State Comments
Proposition 65: This product contains chemical(s) considered by the State of California's Safe Drinking Water and Toxic Enforcement Act of 1986 to cause cancer and/or reproductive toxicity. See table under U.S. Federal and State Regulations for the specific chemicals.

Silica, crystalline, quartz
carcinogen
Naphthalene
carcinogen

Canadian Classification

16. Other information

Supersedes date	04/Sep/2014
Revision date	02/Jan/2015
Version	3
The following sections have been revised	1, 2, 3, 11, 14, 15, 16.

HMIS classification

Health	2*
Flammability	2
Physical hazard	0
PPE	J

N/A - Not Applicable, N/D - Not Determined.

Disclaimer
The information contained herein is considered in good faith as reliable of the date issued and is based upon on measurements, tests or data derived from supplier's own study or furnished by others. In providing this SDS information, Supplier makes no express or implied warranties as to the information or product; merchantability or fitness of purpose; any express or implied warranty; or non-infringement of intellectual property rights; and supplier assumes no responsibility for any direct, special or consequential damages, results obtained, or the activities of others. To the maximum extent permitted by law, supplier's warranty obligations and buyer's sole remedies are as stated in separate agreement between the parties.

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-SECTIONS
Proprietary Information

3.5 SHALLOW HAZARDS REPORT
The proposed operations will be conducted from a previously approved surface location; 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; 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

Cantium anticipates encountering 0 ppm H_2S during the proposed operations.

4.2 CLASSIFICATION

In accordance with Title 30 CFR 250.490(c), Cantium requests that the area of proposed operations be classified by the BOEM as H_2S absent.

4.3 H_2S CONTINGENCY PLAN

An H_2S 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)

Bay Marchand Block 2 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)

Bay Marchand Block 2 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

Bay Marchand Block 2 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	*Trichechus manatus latirostris*	T	--	X	Florida (peninsular)
Whale, Blue	*Balaenoptera masculus*	E	X[1]	--	None
Whale, Bryde's[4]	*Balaenoptera brydei/edeni*	E	X	--	None
Whale, Fin	*Balaenoptera physalus*	E	X[1]	--	None
Whale, Humpback	*Megaptera novaeangliae*	E	X[1]	--	None
Whale, North Atlantic Right	*Eubalaena glacialis*	E	X[1]	--	None
Whale, Rice's[4]	*Balaenoptera ricei*	E	X	--	None
Whale, Sei	*Balaenopiera borealis*	E	X[1]	--	None
Whale, Sperm	*Physeter catodon (=macrocephalus)*	E	X	--	None
Terrestrial Mammals					
Mouse, Beach (Alabama, Choctawatchee, Perdido Key, St. Andrew)	*Peromyscus polionotus*	E	-	X	Alabama, Florida (panhandle) beaches
Jaguarundi, Gulf Coast	*Puma yagouaroundi cacomitli*	E	-	X	None
Ocelot	*Leopardus (=Felis) pardalis*	E	-	X	None
Bat, Florida Bonneted	*Eumops floridanus*	E	-	X	None
Panther, Florida	*Puma (=Felis) concolor coryi*	E	-	X	None
Vole, Florida Salt Marsh	*Microtus pennsylvanicus dukecampbelli*	E	-	X	None
Deer, Key	*Odocoileus virginianus clavium*	E	-	X	None
Rabbit, Lower Keys Marsh	*Sylvilagus palustris hefneri*	E	-	X	None
Rat, Silver Rice	*Oryzomys palustris natator*	E	-	X	None
Birds					
Plover, Piping	*Charadrius melodus*	T	-	X	Coastal Texas, Louisiana, Mississippi, Alabama and Florida (panhandle)
Crane, Whooping	*Grus Americana*	E	-	X	Coastal Texas
Crane, Mississippi sandhill	*Grus canadensis pulla*	E	-	X	Coastal Mississippi
Caracara, Audubon's Crested	*Polyborus plancus audubonii*	T	-	X	None
Curlew, Eskimo	*Numenius borealis*	E	-	X	None
Falcon, Northern Aplomado	*Falco femoralis septentrionalis*	E	-	X	None
Prairie-chicken, Attwater's Greater	*Tympanuchus cupido attwateri*	E	-	X	None
Scrub-jay, Florida	*Aphelocoma coerulescens*	T	-	X	None

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico
			Lease Area	Coastal	
Kite, Everglade Snail	*Rostrhamus sociabilis plumbeus*	E	-	X	None
Knot, Red	*Calidris canutus rufa*	T	-	X	None
Rail, Eastern Black	*Laterallus jamaicensis ssp. jamaicensis*	T	-	X	None
Sparrow, Cape Sable Seaside	*Ammodramus maritimus mirabilis*	E	-	X	Everglades
Stork, Wood	*Mycteria americana*	T	-	X	None
Tern, Roseate	*Sterna dougallii dougallii*	T	-	X	None
Warbler, Bachman's	*Vermivora bachmanii*	E	-	X	None
Woodpecker, Red-cockaded	*Picoides borealis*	E	-	X	None
Reptiles					
Sea Turtle, Green	*Chelonia mydas*	T/E[3]	X	X	None
Sea Turtle, Hawksbill	*Eretmochelys imbricata*	E	X	X	None
Sea Turtle, Kemp's Ridley	*Lepidochelys kempli*	E	X	X	None
Sea Turtle, Leatherback	*Dermochelys coriacea*	E	X	X	None
Sea Turtle, Loggerhead	*Caretta caretta*	T	X	X	Texas, Louisiana, Mississippi, Alabama, Florida
Turtle, Alabama Red-bellied	*Pseudemys alabamensis*	E	-	X	None
Crocodile, American	*Crocodylus acutus*	T	-	X	Everglades and Florida Keys
Snake, Eastern Indigo	*Drymarchon couperi*	T	-	X	None
Tortoise, Gopher	*Gopherus polyphemus*	T	-	X	None
Turtle, Ringed Map	*Graptemys oculifera*	T	-	X	None
Turtle, Yellow-blotched Map	*Graptemys flavimaculata*	T	-	X	None
Fish					
Sturgeon, Gulf	*Acipenser oxyrinchus (=oxyrhynchus) desotoi*	T	X	X	Coastal Louisiana, Mississippi, Alabama and Florida (panhandle)
Shark, Oceanic Whitetip	*Carcharhinus longimanus*	E	X	_	None
Sawfish, Smalltooth	*Pristis pectinate*	E	-	X	None
Grouper, Nassau	*Epinephelus striatus*	T	-	X	Florida[5]
Ray, Giant Manta	*Manta birostris*	E	X	--	None
Sturgeon, Pallid	*Scaphirhynchus albus*	E	-	X	None
Corals					

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico
			Lease Area	Coastal	
Coral, Elkhorn	*Acopora palmate*	T	X[2]	X	Florida[5]
Coral, Staghorn	*Acopora cervicornis*	T	X	X	Florida[5]
Coral, Boulder Star	*Orbicella franksi*	T	X	X	Flower Garden Banks and Florida
Coral, Lobed Star	*Orbicella annularis*	T	X	X	Flower Garden Banks and Florida
Coral, Mountainous Star	*Orbicella faveolate*	T	X	X	Flower Garden Banks and Florida
Coral, Rough Cactus	*Mycetophyllia ferox*	T	-	X	Florida[5]
Coral, Pillar	*Dendrogyra cylindrus*	T	-	X	Florida[5]

Abbreviations: E = Endangered; T = Threatened

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

2 According to the 2017 EIS, Elkhorn Coral, while uncommon, has been found in the Flower Garden Banks. (BOEM 2017-009)

3 Green Sea Turtles are considered threatened throughout the Gulf of America; however, the breeding population off the coast of Florida is considered endangered.

4 The Bryde's whale, also known as the Bryde's whale complex, is a collection of baleen whales that are still being researched to determine if they are the same species or if they are individual species of whales. In 2021, the Rice's whale, formerly known as the Gulf of Mexico Bryde's whale, was determined to be a separate species. There are less than 100 Rice's whales living in the Gulf of Mexico year-round. These whales retain all the protections of the Gulf of Amer Bryde's whale under the Endangered Species Act while the regulations are being updated to reflect the name change. Other Bryde's whales are migratory and may enter the Gulf of America; however, the migratory Bryde's whales are rare or extralimital in the Gulf of America and are unlikely to be present in the lease area.

5 Critical habitat is in the Gulf of America, but outside of planning area. Species may still occur in the Gulf of America.

6.8 ARCHAEOLOGICAL REPORT

The proposed operations will be conducted from a previously approved surface location; 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 WASTE ESTIMATED TO BE GENERATED, TREATED AND/OR DOWNHOLE DISPOSED OR DISCHARGED TO THE GOM

Please specify if the amount reported is a total or per well amount and be sure to include appropriate units.

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	Spud Mud, Low-solids non dispersed water-based	2500 bbls/well	1250 bbls/day/well	discharged overboard	no
Cuttings wetted with water-based fluid	Cuttings gerneated while using water-based fluid	1200 bbls/well	600 bbls/day/well	discharged overboard	no
Synthetic based drilling fluid	NA	NA	NA	NA	no
Cuttings wetted with synthetic-based fluid	NA	NA	NA	NA	no
Will humans be there? If yes, expect conventional waste					
Domestic waste	Grey water from living quarters	30,000 bbls/well	10 bbls/hr/well	discharged overboard	no
Sanitary waste	Black water from living quarters	3,000 bbls/well	1 bbl/hr/well	treated and discharged overboard	no
Is there a deck? If yes, there will be Deck Drainage					
Deck Drainage	Rain	15, 000 bbls/well	100 bbls/hr/well	discharged overboard	no
Will you conduct well treatment, completion, or workover?					
Well treatment fluids	NA				
Well completion fluids	NA				
Workover fluids	NA				
Miscellaneous discharges. If yes, only fill in those associated with your activity.					
Desalinization unit discharge	Super Saturated Seawater	44,000 bbl/well	15 bbls/hrwell	discharged overboard	no
Blowout prevent fluid	water based hydraulic fluid	750 bbl/well	0.25 bbls/hr/well	discharged overboard	no
Ballast water	Potable water	10,000 bbl/well	1,000 bbls/hr/well	discharged overboard	no
Bilge water	Seawater	10,000 bbls/well	1000 bbls/hr/well	discharged overboard	no
Excess cement at seafloor	Class H Cement	500 bbls/well	10 bbls/hr/well	discharged overboard	no
Fire water	Seawater	12,500 bbls/well	0.25 bbls/hr/well	discharged overboard	no
Cooling water	Seawater	300,000 bbls/well	100 bbls/hr/well	discharged overboard	no
Will you produce hydrocarbons? If yes fill in for produced water.					
Produced water	NA				
Please enter *individual* or *general* to indicate which type of NPDES permit you will be covered by?			General		
NOTE: If you will not have a type of waste for the activity being applied for, enter NA for all columns in the row.			NOTE: All discharged wastes should comply with the requirements of the NPDES permit.		

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_2S 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 no existing facilities or activities co-located with the currently proposed activities; therefore, Complex Total Emissions are the same as Plan Emissions and are provided in **Attachment 8-A.**

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

Attachment 8-A

DOCD/DPP - AIR QUALITY

OMB Control No. 1010-0151
OMB Approval Expires: 10/31/2027

COMPANY	Cantium, LLC
AREA	Bay Marchand
BLOCK	2
LEASE	OCS 00369
FACILITY	Caisson 28
WELL	24
COMPANY CONTACT	Dena Rodriguez
TELEPHONE NO.	281-698-8512
REMARKS	Emissions provide for future operations on Well No. 024, including contingency drilling days each year for maintenance, workovers, recompletions, sidetracks, interventions and abandonment activities; utilizing Enterprise 205 or equivalent jackup; no equipment on structure

LEASE TERM PIPELINE CONSTRUCTION INFORMATION:

YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS
2026	N/A	N/A
2027		
2028		
2029		
2030		
2031		
2032		
2033		
2034		
2035		

AIR EMISSIONS COMPUTATION FACTORS

Fuel Usage Conversion Factors	Natural Gas Turbines				Natural Gas Engines		Diesel Recip. Engine		Diesel Turbines			
	SCF/hp-hr	9.524			SCF/hp-hr	7.143	GAL/hp-hr	0.0514	GAL/hp-hr	0.0514		

Equipment/Emission Factors	units	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	REF.	DATE	Reference Links
Natural Gas Turbine	g/hp-hr		0.0086	0.0086	0.0026	1.4515	0.0095	N/A	0.3719	N/A	AP42 3.1-1& 3.1-2a	4/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf
RECIP. 2 Cycle Lean Natural Gas	g/hp-hr		0.1293	0.1293	0.0020	6.5998	0.4082	N/A	1.2009	N/A	AP42 3.2-1	7/00	https://www3.epa.gov/ttn/chief/ap42/ch03/final/c03s02.pdf
RECIP. 4 Cycle Lean Natural Gas	g/hp-hr		0.0002	0.0002	0.0020	2.8814	0.4014	N/A	1.8949	N/A	AP42 3.2-2	7/00	https://www3.epa.gov/ttn/chief/ap42/ch03/final/c03s02.pdf
RECIP. 4 Cycle Rich Natural Gas	g/hp-hr		0.0323	0.0323	0.0020	7.7224	0.1021	N/A	11.9408	N/A	AP42 3.2-3	7/00	https://www3.epa.gov/ttn/chief/ap42/ch03/final/c03s02.pdf
Diesel Recip. < 600 hp	g/hp-hr	1	1	1	0.0279	14.1	1.04	N/A	3.03	N/A	AP42 3.3-1	10/96	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s03.pdf
Diesel Recip. > 600 hp	g/hp-hr	0.32	0.182	0.178	0.0055	10.9	0.29	N/A	2.5	N/A	AP42 3.4-1 & 3.4-2	10/96	https://www3.epa.gov/ttn/chief/ap42/ch03/final/c03s04.pdf
Diesel Boiler	lbs/bbl	0.0840	0.0420	0.0105	0.0089	1.0080	0.0084	5.14E-05	0.2100	0.0336	AP42 1.3-6; Pb and NH3: WebFIRE (08/2018)	9/98 and 5/10	https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s02.pdf https://cfpub.epa.gov/webfire/
Diesel Turbine	g/hp-hr	0.0381	0.0137	0.0137	0.0048	2.7941	0.0013	4.45E-05	0.0105	N/A	AP42 3.1-1 & 3.1-2a	4/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf
Dual Fuel Turbine	g/hp-hr	0.0381	0.0137	0.0137	0.0048	2.7941	0.0095	4.45E-05	0.3719	0.0000	AP42 3.1-1& 3.1-2a; AP42 3.1-1 & 3.1-2a	4/00	https://cfpub.epa.gov/webfire/
Vessels – Propulsion	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference	3/19	
Vessels – Drilling Prime Engine, Auxiliary	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference	3/19	https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-data
Vessels – Diesel Boiler	g/hp-hr	0.0466	0.1491	0.1417	0.4400	1.4914	0.0820	3.73E-05	0.1491	0.0003	USEPA 2017 NEI;TSP (units converted) refer to Diesel Boiler Reference	3/19	
Vessels – Well Stimulation	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference	3/19	
Natural Gas Heater/Boiler/Burner	lbs/MMscf	7.60	1.90	1.90	0.60	190.00	5.50	5.00E-04	84.00	3.2	AP42 1.4-1 & 1.4-2; Pb and NH3: WebFIRE (08/2018)	7/98 and 8/18	https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s04.pdf https://cfpub.epa.gov/webfire/
Combustion Flare (no smoke)	lbs/MMscf	0.00	0.00	0.00	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
Combustion Flare (light smoke)	lbs/MMscf	2.10	2.10	2.10	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	https://www3.epa.gov/ttn/chief/ap42/ch13/final/C13S05_02-05-18.pdf
Combustion Flare (medium smoke)	lbs/MMscf	10.50	10.50	10.50	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
Combustion Flare (heavy smoke)	lbs/MMscf	21.00	21.00	21.00	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
Liquid Flaring	lbs/bbl	0.42	0.0966	0.0651	5.964	0.84	0.01428	5.14E-05	0.21	0.0336	AP42 1.3-1 through 1.3-3 and 1.3-5	5/10	https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s03.pdf
Storage Tank	tons/yr/tank						4.300				2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	https://www.boem.gov/environment/environmental-studies/2014-gulfwide-emission-inventory
Fugitives	lbs/hr/component						0.0005				API Study	12/93	https://www.apiwebstore.org/publications/item.cgi?9879d38a-8bc0-4abe-bb5c-9b6238701250d
Glycol Dehydrator	tons/yr/dehydrator						19.240				2011 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2014	https://www.boem.gov/environment/environmental-studies/2011-gulfwide-emission-inventory
Cold Vent	tons/yr/vent						44.747				2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	https://www.boem.gov/environment/environmental-studies/2014-gulfwide-emission-inventory
Waste Incinerator	lb/ton		15.0	15.0	2.5	2.0	N/A	N/A	20.0	N/A	AP 42 2.1-12	10/96	https://www3.epa.gov/ttnchie1/ap42/ch02/final/c02s01.pdf
On-Ice – Loader	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Other Construction Equipment	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Other Survey Equipment	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Tractor	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	https://www.epa.gov/moves/nonroad2008a-installation-and-updates
On-Ice – Truck (for gravel island)	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Truck (for surveys)	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
Man Camp - Operation (max people/day)	tons/person/day		0.0004	0.0004	0.0004	0.006	0.001	N/A	0.001	N/A	BOEM 2014-1001	2014	https://www.boem.gov/sites/default/files/uploadedFiles/BOEM/BOEM_Newsroom/Library/Publications/2014-1001.pdf
Vessels - Ice Management Diesel	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference	3/19	inventory-nei-data
Vessels - Hovercraft Diesel	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference	3/19	inventory-nei-data

Sulfur Content Source	Value	Units
Fuel Gas	3.38	ppm
Diesel Fuel	0.0015	% weight
Produced Gas (Flare)	3.38	ppm
Produced Oil (Liquid Flaring)	1	% weight

Density and Heat Value of Diesel Fuel		
Density	7.05	lbs/gal
Heat Value	19,300	Btu/lb

Heat Value of Natural Gas		
Heat Value	1,050	MMBtu/MMscf

Natural Gas Flare Parameters	Value	Units
VOC Content of Flare Gas	0.6816	lb VOC/lb-mol gas
Natural Gas Flare Efficiency	98	%

AIR EMISSIONS CALCULATIONS - 1ST YEAR

COMPANY	AREA		BLOCK	LEASE	FACILITY	WELL					CONTACT		PHONE		REMARKS										
Cantium, LLC	Bay Marchand		2	OCS 00369	Caisson 28	24					Dena Rodriguez		281-698-8512		Emissions provide for future operations on Well No. 024, including contingency drilling days each year for maintenance, workovers, recompletions, sidetracks, interventions and abandonment										
OPERATIONS	EQUIPMENT	EQUIPMENT ID	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	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3
DRILLING	VESSELS- Drilling - Propulsion Engine - Diesel	Enterprise 205	4660	239.73836	5753.72	24	41	3.29	1.98	1.92	0.05	78.77	2.26	0.00	12.35	0.02	1.62	0.98	0.95	0.02	38.75	1.11	0.00	6.08	0.01
	VESSELS- Drilling - Propulsion Engine - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels - Diesel Boiler		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels – Drilling Prime Engine, Auxiliary		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIPELINE	VESSELS - Pipeline Laying 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INSTALLATION	VESSELS - Pipeline Burying - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	VESSELS - Lift Boat Propulsion Diesel	Leatherjack 175'	1050	54.0183	1296.44	24	2	0.74	0.45	0.43	0.01	17.75	0.51	0.00	2.78	0.01	0.02	0.01	0.01	0.00	0.43	0.01	0.00	0.07	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	0.00	0.00	0.00	--	0.00	--
	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	0.00	0.00	0.00	--	0.00	--
	VESSELS - Shuttle Tankers		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Well Stimulation		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Turbine		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	0.00	--	0.00	--
	Diesel Turbine		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	0.00	0.00	0.00	0.00	0.00	0.00	--
	Dual Fuel Turbine		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 2 Cycle Lean Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	RECIP. 4 Cycle Lean Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	RECIP. 4 Cycle Rich Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	Diesel Boiler					0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Heater/Boiler/Burner		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MISC.		**BPD**	**SCF/HR**	**COUNT**																				
	STORAGE TANK				0	0	0	--	--	--	--	--	#DIV/0!	--	--	--	--	--	--	--	--	0.00	--	--	--
	COMBUSTION FLARE - no smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - light smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - medium smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - heavy smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COLD VENT				0	0	0	--	--	--	--	--	#DIV/0!	--	--	--	--	--	--	--	--	0.00	--	--	--
	FUGITIVES				600	24	365	--	--	--	--	--	0.30	--	--	--	--	--	--	--	--	1.31	--	--	--
	GLYCOL DEHYDRATOR				0	0	0	--	--	--	--	--	#DIV/0!	--	--	--	--	--	--	--	--	0.00	--	--	--
	WASTE INCINERATOR		0			0	0	--	0.00	0.00	0.00	0.00	--	--	0.00	--	--	0.00	0.00	0.00	0.00	--	--	0.00	--
DRILLING	Liquid Flaring		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WELL TEST	COMBUSTION FLARE - no smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - light smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - medium smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - heavy smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
ALASKA-SPECIFIC SOURCES	**VESSELS**		**kW**			**HR/D**	**D/YR**																		
	VESSELS - Ice Management Diesel		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
2026	**Facility Total Emissions**							**4.03**	**2.43**	**2.36**	**0.06**	**96.51**	**#DIV/0!**	**0.00**	**15.14**	**0.03**	**1.64**	**0.99**	**0.96**	**0.02**	**39.18**	**2.44**	**0.00**	**6.15**	**0.01**
EXEMPTION CALCULATION	**DISTANCE FROM LAND IN MILES**																**149.85**			**149.85**	**149.85**	**149.85**		**9,267.32**	
	4.5																								
DRILLING	VESSELS- Crew Diesel		6750	347.2605	8334.25	24	41	4.76	2.87	2.79	0.07	114.09	3.28	0.00	17.90	0.03	2.34	1.41	1.37	0.03	56.13	1.61	0.00	8.80	0.02
	VESSELS - Supply Diesel		7240	372.46904	8939.26	24	41	5.11	3.08	2.99	0.07	122.38	3.52	0.00	19.19	0.04	2.51	1.52	1.47	0.04	60.21	1.73	0.00	9.44	0.02
	VESSELS - Tugs Diesel		8400	432.1464	10371.51	18	4	5.93	3.58	3.47	0.09	141.98	4.08	0.00	22.27	0.04	0.21	0.13	0.12	0.00	5.11	0.15	0.00	0.80	0.00
PIPELINE	VESSELS - Support Diesel, Laying		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INSTALLATION	VESSELS - Support Diesel, Burying		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Crew 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Supply 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY	VESSELS - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INSTALLATION	VESSELS - Crew 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Supply Diesel		2065	106.23599	2549.66	10	10	1.46	0.88	0.85	0.02	34.90	1.00	0.00	5.47	0.01	0.07	0.04	0.04	0.00	1.75	0.05	0.00	0.27	0.00
PRODUCTION	VESSELS - Support Diesel		2065	106.23599	2549.66	24	83	1.46	0.88	0.85	0.02	34.90	1.00	0.00	5.47	0.01	1.45	0.88	0.85	0.02	34.76	1.00	0.00	5.45	0.01
ALASKA-SPECIFIC SOURCES	**On-Ice Equipment**			**GAL/HR**	**GAL/D**																				
	Man Camp - Operation (maximum people per day)		**PEOPLE/DAY**																						
	VESSELS		**kW**			**HR/D**	**D/YR**																		
	On-Ice – Loader			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Other Construction Equipment			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Other Survey Equipment			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Tractor			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Truck (for gravel island)			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Truck (for surveys)			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	Man Camp - Operation		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	
	VESSELS - Hovercraft Diesel		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2026	**Non-Facility Total Emissions**							**18.71**	**11.29**	**10.95**	**0.27**	**448.26**	**12.89**	**0.00**	**70.31**	**0.13**	**6.59**	**3.98**	**3.86**	**0.10**	**157.96**	**4.54**	**0.00**	**24.78**	**0.05**

AIR EMISSIONS CALCULATIONS - 2ND YEAR

COMPANY	AREA		BLOCK	LEASE	FACILITY	WELL					CONTACT		PHONE		REMARKS										
Cantium, LLC	Bay Marchand		2	OCS 00369	Caisson 28	24					Dena Rodriguez		281-698-8512		Emissions provide for future operations on Well No. 024, including contingency drilling days each year for maintenance, workovers, recompletions, sidetracks, interventions and abandonment										
OPERATIONS	EQUIPMENT	EQUIPMENT ID	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	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3
DRILLING	VESSELS- Drilling - Propulsion Engine - Diesel	Enterprise 205	4660	239.73836	5753.72	24	100	3.29	1.98	1.92	0.05	78.77	2.26	0.00	12.35	0.02	3.95	2.38	2.31	0.06	94.52	2.72	0.00	14.83	0.03
	VESSELS- Drilling - Propulsion Engine - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels - Diesel Boiler		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels – Drilling Prime Engine, Auxiliary		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIPELINE INSTALLATION	VESSELS - Pipeline Laying 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Pipeline Burying - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	VESSELS - Heavy Lift Vessel/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	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	0.00	0.00	0.00	--	0.00	--
	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	0.00	0.00	0.00	--	0.00	--
	VESSELS - Shuttle Tankers		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Well Stimulation		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Turbine		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	0.00	--	0.00	--
	Diesel Turbine		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	0.00	0.00	0.00	0.00	0.00	0.00	--
	Dual Fuel Turbine		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 2 Cycle Lean Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	RECIP. 4 Cycle Lean Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	RECIP. 4 Cycle Rich Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	Diesel Boiler		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Heater/Boiler/Burner		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MISC.		**BPD**	**SCF/HR**	**COUNT**																				
	STORAGE TANK				0	0	0	--	--	--	--	--	#DIV/0!	--	--	--	--	--	--	--	--	0.00	--	--	--
	COMBUSTION FLARE - no smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - light smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - medium smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - heavy smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COLD VENT				0	0	0	--	--	--	--	--	#DIV/0!	--	--	--	--	--	--	--	--	0.00	--	--	--
	FUGITIVES				600	24	365	--	--	--	--	--	0.30	--	--	--	--	--	--	--	--	1.31	--	--	--
	GLYCOL DEHYDRATOR				0	0	0	--	--	--	--	--	#DIV/0!	--	--	--	--	--	--	--	--	0.00	--	--	--
	WASTE INCINERATOR		0			0	0	--	0.00	0.00	0.00	0.00	--	--	0.00	--	--	0.00	0.00	0.00	0.00			0.00	
DRILLING	Liquid Flaring		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WELL TEST	COMBUSTION FLARE - no smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - light smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - medium smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - heavy smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
ALASKA-SPECIFIC SOURCES	**VESSELS**		**kW**			**HR/D**	**D/YR**																		
	VESSELS - Ice Management Diesel		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
2027-2037	**Facility Total Emissions**							**3.29**	**1.98**	**1.92**	**0.05**	**78.77**	**#DIV/0!**	**0.00**	**12.35**	**0.02**	**3.95**	**2.38**	**2.31**	**0.06**	**94.52**	**4.03**	**0.00**	**14.83**	**0.03**
EXEMPTION CALCULATION	**DISTANCE FROM LAND IN MILES**																**149.85**			**149.85**	**149.85**	**149.85**		**9,267.32**	
	4.5																								
DRILLING	VESSELS- Crew Diesel		6750	347.2605	8334.25	24	100	4.76	2.87	2.79	0.07	114.09	3.28	0.00	17.90	0.03	5.71	3.45	3.34	0.08	136.91	3.94	0.00	21.47	0.04
	VESSELS - Supply Diesel		7240	372.46904	8939.26	24	100	5.11	3.08	2.99	0.07	122.38	3.52	0.00	19.19	0.04	6.13	3.70	3.59	0.09	146.85	4.22	0.00	23.03	0.04
	VESSELS - Tugs Diesel		8400	432.1464	10371.51	18	4	5.93	3.58	3.47	0.09	141.98	4.08	0.00	22.27	0.04	0.21	0.13	0.12	0.00	5.11	0.15	0.00	0.80	0.00
PIPELINE INSTALLATION	VESSELS - Support Diesel, Laying		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Support Diesel, Burying		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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Crew 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Supply 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	VESSELS - 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Crew 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Supply 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PRODUCTION	VESSELS - Support Diesel		2065	106.23599	2549.66	24	76	1.46	0.88	0.85	0.02	34.90	1.00	0.00	5.47	0.01	1.33	0.80	0.78	0.02	31.83	0.92	0.00	4.99	0.01
ALASKA-SPECIFIC SOURCES	**On-Ice Equipment**			**GAL/HR**	**GAL/D**																				
	Man Camp - Operation (maximum people per day)		**PEOPLE/DAY**																						
	VESSELS		**kW**			**HR/D**	**D/YR**																		
	On-Ice – Loader			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Other Construction Equipment			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Other Survey Equipment			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Tractor			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Truck (for gravel island)			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	On-Ice – Truck (for surveys)			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	Man Camp - Operation		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	
	VESSELS - Hovercraft Diesel		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2027-2037	**Non-Facility Total Emissions**							**17.25**	**10.41**	**10.10**	**0.25**	**413.36**	**11.88**	**0.00**	**64.83**	**0.12**	**13.39**	**8.08**	**7.83**	**0.19**	**320.71**	**9.22**	**0.00**	**50.30**	**0.09**

AIR EMISSIONS CALCULATIONS

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL	
Cantium, LLC	Bay Marchand	2	OCS 00369	Caisson 28	24	

Year	Facility Emitted Substance								
	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3
2026	1.64	0.99	0.96	0.02	39.18	2.44	0.00	6.15	0.01
2027-2037	3.95	2.38	2.31	0.06	94.52	4.03	0.00	14.83	0.03
Allowable	149.85			149.85	149.85	149.85		9267.32	

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 Cantium, LLC (Company No. 03481) dated November 2025 and last approved on May 11, 2026 (OSRP Control No. O-1011).

9.2 SPILL RESPONSE SITES

Primary Response Equipment Location	Preplanned Staging Location
Houma, LA	Houma, LA
Harvey, LA	Harvey, LA
Venice, LA	Venice, LA

9.3 OSRO INFORMATION

Cantium's primary equipment provider is Clean Gulf Associates. Clean Gulf Associates Services 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)	BM2	BM2	ST24	BM2
Facility designation	Well No. 024	Well No. 024	Well No. CM003	Caisson #28
Distance to nearest shoreline (miles)	4.5	4.5	6.8	4.5
Storage tanks & flowlines (bbl)	0	0	0	0
Lease term pipelines (bbl)	0	0	0	0
Uncontrolled blowout (bbl)	168,723	168,723	9,400	4,418
Total Volume (bbl)	**168,723**	**168,723**	**9,400**	**4,418**
Type of oil(s) (crude, condensate, diesel)	crude	crude	crude	crude
API gravity	38°	38°	27°	28°

Cantium 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 Cantium, LLC has the capability to respond to the worst-case spill scenario included in our Regional OSRP approved on May 11, 2026, and since the worst-case scenario determined

for our DOCD does not replace the worst-case scenario in our Regional OSRP, Cantium, LLC hereby certifies that Cantium, LLC 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 168,723 barrels of crude oil per day 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 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 Terrebonne and/or Lafourche Parish, Louisiana within 3, 10, and 30 days.

Terrebonne Parish includes the eastern portion of Atchafalaya National Wildlife Refuge across to Timbalier Bay. The Terrebonne parish also includes the area along the Gulf Coast including Caillou Bay, Isles Dernieres and Terrebonne Bay. The entire parish is classified as an EPA National Estuary. This area is primarily marshland, broken up by numerous small bays and freshwater lakes.

Lafourche Parish includes Timbalier Bay and Bayou Lafourche east to Bay Tambour and Caminada Bay. The Timbalier Bay area contains rookeries, mangroves, oyster beds and finfish and shellfish nursery grounds. Seven rookeries are located northwest of Grand Isle in Bay Tambour and Caminada Bay. Open beaches are located along the Gulf Coast. This area is a part of the Barataria Basin, a unique fishery habitat which has shallow estuarine waters, sandbars, small barrier and coastal islands and wetlands. This area is also a nesting ground for the brown pelican, an endangered species.

Response

Cantium 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.

Natural Weathering Data: BM 2, Well No. 024	**Barrels of Oil**
WCD Volume (24 hrs)	168,723
Less 24% natural evaporation/dispersion	40,494
Remaining volume	128,229

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. Please note that **Figure 2** is a list of contractually available equipment, which may be called out in the event of an exercise or spill. However, operations and specific equipment are situationally dependent and may change according to product specifications, weather, and environmental conditions, etc. **Safety is first priority. Air monitoring will be accomplished and operations deemed safe prior to any containment/skimming attempts.**

Cantium'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, 4 sorties (4,800 gallons) from the DC-3 aircraft and 4 sorties (8,000 gallons) from the Basler aircraft would provide a daily dispersant capability of 7,540 barrels. If the conditions are favorable for in-situ burning, the proper approvals have been obtained and the proper planning is in place, in-situ burning of oil may be attempted. Slick containment boom would be immediately called out and on-scene as soon as possible. Offshore response strategies may include attempting to skim utilizing CGA's response equipment, with a total derated skimming capacity of 714,777 barrels. Temporary storage associated with skimming equipment equals 164,996 barrels. If additional storage is needed, various storage barges with a total capacity 608,000 bbls may be mobilized and centrally located to provide temporary storage and minimize off-loading time. Additionally, CGA works with the member company's Incident Management Team (IMT), specifically the marine logistics group within the logistics section, to identify and procure Offshore Supply Vessels (PSV/OSV) capable of providing temporary offshore storage to the initial mechanical recovery assets within 12-24 hours, ensuring that devices for the storage of recovered oil are sufficient to allow containment and recovery operations to continue without interruption. If needed, CGA can leverage an internal CGA membership vessel sharing agreement to help locate available Petroleum Industry Dedicated Vessels (PIDV). All OSVs can provide between 20% - 100% of their deadweight in recovered oil storage (4k – 30k bbls) based on the vessel's Certificate of Inspection (COI).

If the spill went unabated, shoreline impact in Terrebonne and/or Lafourche Parish, Louisiana would depend upon existing environmental conditions. Shoreline protection would include the use of CGA's shoreline, near shore and shallow water skimmers with a totaled derated skimming capacity of 231,680 barrels. Temporary storage associated with skimming equipment equals 2,641 barrels. If additional storage is needed, various storage barges with a total capacity 239,820 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. Letters of Intent from AMPOL and E3 OMI will ensure access to 222,150 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. 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. Cantium's contract Incident Management Team has access to the applicable ACP(s) and GRP(s).

Based on the anticipated worst case discharge scenario, Cantium 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 54 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

Cantium 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 Cantium'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 $\geq$ 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 (C^3)

- Publish, implement, and fully test an appropriate communications plan
- Design an operational scheme, maintaining a manageable span of control
- Designate and mark C^3 vessels for easy aerial identification
- Designate and employ C^3 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: • 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): Cantium 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.

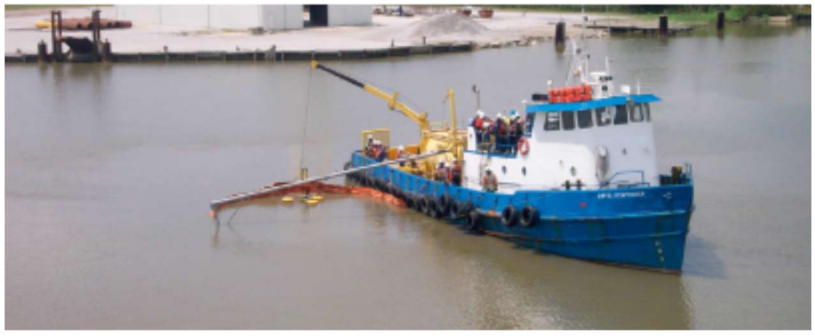
Skimming Operations: PIDVs are the preferred VOO skimming platform. OSROs are more versed in operating on these platforms and the vessels are generally large enough with crews more likely versed in spill response operations. They also have a greater possibility of having on-board storage capacity and 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

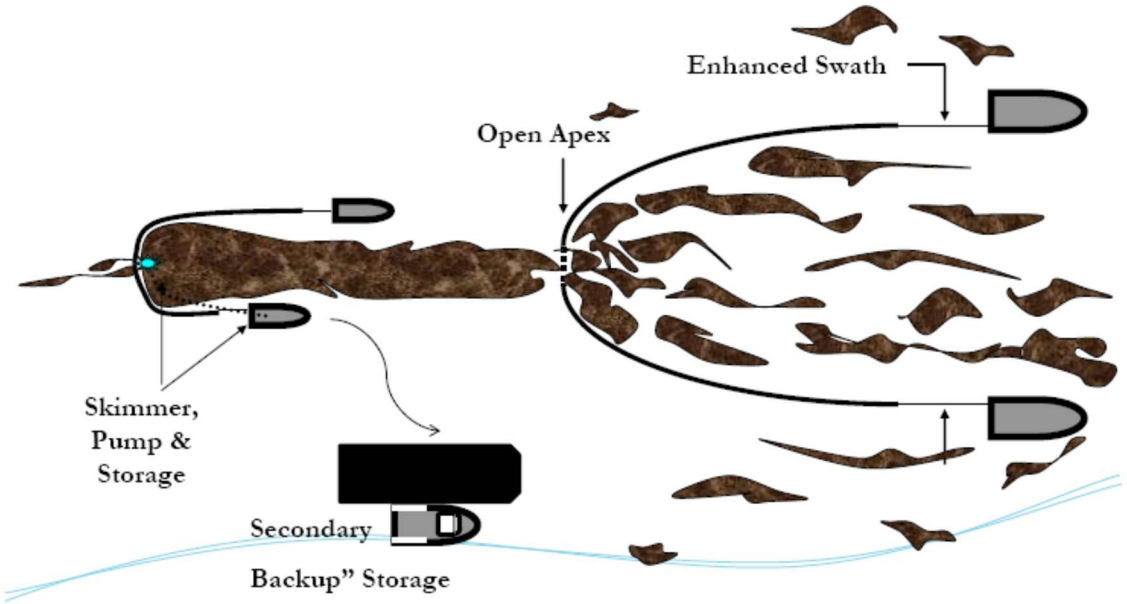
Mechanical Recovery – Deployed on large vessels of opportunity (VOO) the Koseq Rigid Sweeping Arms are high volume surge capacity deployed to increase recovery capacity at the source of a large oil spill in the offshore and outer nearshore environment of the Gulf. They are highly mobile and sustainable 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.

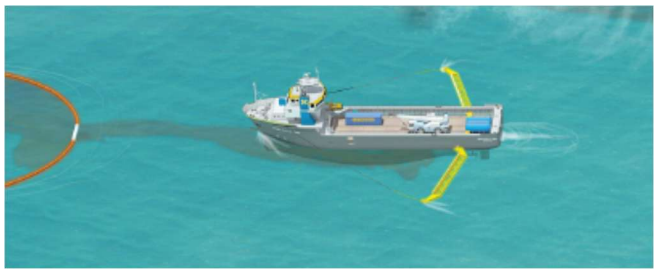
Command and Control – The large OSVs in many cases have state of the art communication and electronic systems, as well as the accommodations to support the function of directing all skimming operations offshore and reporting back to the command post.

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 thought 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 $\geq$ 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
- Marco SWS
- Operate with aerial spotter directing systems to observed oil slicks

VOO

- Use Cantium'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
- 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 the 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 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 in 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 Gulf

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 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

Trajectory of a spill and the probability of it impacting a land segment have been projected utilizing Cantium's WCD and information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf available on the BOEM website using 3, 10, and 30 day impact. The results are tabulated below.

Area/Block	OCS-G	Launch Area	Land Segment and/or Resource	Conditional Probability (%)
Install two strap-on conductors to Caisson No. 28 and drill, complete, and produce one well (Well No. 024) f/ Caisson No. 28 **BM 2, Well No. 024** *4.5 miles from shore*	00369	C37		*3 day*
			Terrebone, LA	**13**
			Lafourche, LA	**13**
			Jefferson, LA	2
			Plaquemines, LA	4
				10 day
			Cameron, LA	1
			Vermilion, LA	2
			Iberia, LA	1
			Terrebonne, LA	**18**
			Lafourche, LA	15
			Jefferson, LA	3
			Plaquemines, LA	9
				30 day
			Matagorda, TX	1
			Brazoria, TX	1
			Galveston, TX	1
			Jefferson, TX	1
			Cameron, LA	6
			Vermilion, LA	4
			Iberia, La	1
			Terrebonne, LA	**20**
			Lafourche, LA	16
			Jefferson, LA	4
			Plaquemines, LA	10

WCD Scenario– <u>BASED ON WELL BLOWOUT DURING DRILLING OPERATIONS</u> (4.5 miles from shore)
128,229 bbls of crude oil (24 hour volume considering natural weathering)
API Gravity 38°

FIGURE 2 – Equipment Response Time to BM 2, Well No.024

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	0.3	4.3
DC 3	1200	2	Houma	2	2	0.3	4.3
Aero Commander	NA	2	Houma	2	2	0.3	4.3

Offshore Response

Offshore Equipment Pre-Determined Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to Gulf	Travel to Spill Site	Hrs to Deploy	Total Hrs
CGA											
HOSS Barge	76285	4000	3 Tugs	12	Harvey	6	0	12	4.5	2	24.5
95' FRV	22885	249	NA	6	Venice	2	0	3	0.5	1	6.5
95' FRV	22885	249	NA	6	Leeville	2	0	2	2	1	7
95' FRV	22885	249	NA	6	Vermilion	2	0	3	3	1	9
95' FRV	22885	249	NA	6	Galveston	2	0	2	15	1	20
Boom Barge (CGA-300) 42" Auto Boom (25000')	NA	NA	1 Tug 50 Crew	4 (Barge) 2 (Per Crew)	Leeville	8	0	4	1	2	15
Genesis Marine (Available through contract with CGA)											
GM 11103	NA	111000	1 Tug	6	New Orleans	24	12	0	10	0	46
GM 11104	NA	111000	1 Tug	6	New Orleans	24	12	0	10	0	46
GM 11105	NA	111000	1 Tug	6	New Orleans	24	12	0	10	0	46
GM 6506	NA	65000	1 Tug	6	New Orleans	24	12	0	10	0	46
GM 6507	NA	65000	1 Tug	6	New Orleans	24	12	0	10	0	46
GM 6508	NA	65000	1 Tug	6	New Orleans	24	12	0	10	0	46
GM 8001	NA	80000	1 Tug	6	New Orleans	24	12	0	10	0	46

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
Aqua Guard Triton RBS (2)	44646	4000	2 Utility	12	Galveston	4	12	12	0.5	2	30.5
Koseq Skimming Arms (10) Lamor brush	228850	60000	10 OSV	60	Galveston, TX	24	24	12	0.5	2	62.5
Koseq Skimming Arms (6) Lamor brush	137310	36000	6 OSV	36	Harvey, LA	24	24	3	0.5	2	53.5
Koseq Skimming Arms (6) MariFlex 150 HF	108978	36000	6 OSV	36	Harvey, LA	24	24	3	0.5	2	53.5
CGA											
FRU Koseq 502 (1)	4528	4000	1 OSV	2	Galveston	0	12	12	0.5	0	24.5
FRU Koseq 502 (5)	22640	20000	5 OSVs	10	Harvey	0	12	12	0.5	0	24.5
Hydro-Fire Boom	NA	NA	8 Utility	40	Harvey	0	24	3	0.5	6	33.5

Shoreline / Nearshore Response

Nearshore Equipment Pre-determined Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to Gulf	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	Leeville	2	0	N/A	48	1	51
Trinity SWS	21500	249	NA	4	Venice	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	Aransas Pass	2	0	N/A	48	1	51
46’ FRV	15257	65	NA	4	Aransas Pass	2	0	2	20	1	25
46’ FRV	15257	65	NA	4	Leeville	2	0	2	5	1	10
46’ FRV	15257	65	NA	4	Vermilion	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)											
Chesapeake	NA	35000	1 Tug	6	New Orleans	24	12	0	6	0	42
Penn No 80	NA	82482	1 Tug	6	New Orleans	24	12	0	6	0	42
Penn No 81	NA	82482	1 Tug	6	New Orleans	24	12	0	6	0	42
Randy King	NA	39856	1 Tug	6	New Orleans	24	12	0	6	0	42

Staging Area: Fourchon

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 Marco	3588	20	NA	3	Vermilion	2	2	7	2	1	14
SWS Marco	3588	34	NA	3	Leeville	2	2	0.5	2	1	7.5
SWS Marco	3588	34	NA	3	Venice	2	2	5	2	1	12
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Vermilion	4	12	7	2	2	27
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Galveston	4	12	12	2	2	32
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Harvey	4	12	3	2	2	23
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Vermilion	2	2	7	2	1	14
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Harvey	2	2	3	2	1	10
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Vermilion	2	2	7	2	1	14
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Harvey	2	2	3	2	1	10

Staging Area: Fourchon

Shoreline Protection Boom	VOO	Persons Req.	Storage/Warehouse Location	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Deployment Site	Hrs to Deploy	Total Hrs
AMPOL (available through Letter of Intent)									
34,050' 18" Boom	13 Crew	26	New Iberia, LA	2	2	4.1	2	12	22.1
16,000' 18" Boom	7 Crew	14	Chalmette, LA	2	2	3	2	6	15
900' 18" Boom	1 Crew	2	Morgan City, LA	2	2	3	2	2	11
11,800' 18" Boom	5 Crew	10	Gonzales, LA	2	2	5	2	2	13
16,000' 18" Boom	7 Crew	14	Port Arthur, TX	2	2	9	2	6	21
2,700' 18" Boom	2 Crew	4	Decatur, GA	2	2	16	2	6	28
E3 OMI (available through Letter of Intent)									
11,500' 18" Boom	5 Crew	10	Lake Charles, LA	1	1	7	2	3	14
2,000' 18" Boom	1 Crew	2	Shreveport, LA	1	1	11	2	3	18
9,600' 18" Boom	5 Crew	10	Baton Rouge, LA	1	1	4	2	3	11
12,800' 18" Boom	6 Crew	12	Lafayette, LA	1	1	5	2	3	12
4,200' 18" Boom	2 Crew	4	New Orleans, LA	1	1	3	2	3	10
53,600' 18" Boom	24 Crew	72	Jackson, MS	1	1	7	2	3	14
14,000' 18" Boom	6 Crew	12	Mobile, AL	1	1	7	2	3	14
4,000' 18" Boom	2 Crew	4	Pensacola, FL	1	1	9	2	3	16
5,000' 18" Boom	3 Crew	6	Deer Park, TX	1	1	11	2	3	18
12,000' 18" Boom	6 Crew	12	La Marque, TX	1	1	11	2	3	18
12,000' 18" Boom	6 Crew	12	Port Arthur, TX	1	1	9	2	3	16

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	3	1	2	10
Bird Scare Guns (24)	NA	NA	NA	2	Harvey	2	2	3	1	2	10
Bird Scare Guns (12)	NA	NA	NA	2	Galveston	2	2	12	1	2	19
Bird Scare Guns (12)	NA	NA	NA	2	Aransas Pass	2	2	16.5	1	2	23.5
Bird Scare Guns (24)	NA	NA	NA	2	Vermilion	2	2	7	1	2	14
Bird Scare Guns (24)	NA	NA	NA	2	Leeville	2	2	2	1	2	9

Response Asset	Total
Offshore EDRC	714,777
Offshore Recovered Oil Capacity	772,996
Nearshore / Shallow Water EDRC	231,680
Nearshore / Shallow Water Recovered Oil Capacity	242,461

SECTION 10
ENVIRONMENTAL MONITORING INFORMATION

10.1 MONITORING SYSTEMS

Cantium will utilize a mat style Jack-up rig to drill the wells associated with this plan and it's very atypical for marine life to become entangled or entrapped in this style of structure. As a precaution, lines extending into the water will be minimized. Any hoses extending to the water's surface will be configured to minimize the chances of entanglement by marine life. As part of daily pollutions observations, our HSE representative will be trained to look for entangled marine life and take appropriate action.

Cantium will monitor beyond the 157m zone noted in the 2020 Biological Opinion for marine life both before and during the proposed pile driving operations, if applicable; however, Cantium is only expecting to monitor within the 157m zone for pile driving activities. The peak sound level during pile-driving will be below the limit for temporary and permanent hearing loss noted in Table 72 of the 2020 Biological Opinion. Cantium will utilize soft start techniques when initiating pile driving.

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.

Cantium 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:

- Appendices to the Biological Opinion on the Federally Regulated Oil and Gas Program in the Gulf of Mexico issued on March 13, 2020, and the amendment issued on April 26, 2021
  - Appendix A: "Seismic Survey Mitigation and Protected Species Observer Protocols"
  - Appendix B: "Marine Trash and Debris Awareness and Elimination Survey Protocols"
  - Appendix C: "Vessel Strike Avoidance and Injured/Dead Aquatic Protected Species Reporting Protocols"
  - Appendix J: "Sea Turtle Handling and Resuscitation Guidelines"

10.3 FLOWER GARDEN BANKS NATIONAL MARINE SANCTUARY

Bay Marchand Block 2 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

Development activities are subject to the following stipulations attached to Leases OCS 00369 / 00386, Bay Marchand Block 2 / South Timbalier Block 23.

11.1 MARINE PROTECTED SPECIES

In accordance with the Federal Endangered Species Act and the Marine Mammal Protection Act, Cantium 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.

11.2 SPECIAL CONDITION 8(g) AREA

South Timbalier Block 23 is located within the boundary of the "8(g) Zone" established for joint review by the designated state agency for comments on the proposed activity to determine if the activities impact a common reservoir overlying state and federal acreage. Therefore, Cantium will submit the required surface and bottomhole location information to the Louisiana Governor's Office in order to make this determination.

SECTION 12
ENVIRONMENTAL MITIGATION MEASURES INFORMATION

12.1 MEASURES TAKEN TO AVOID, MINIMIZE, AND MITIGATE IMPACTS

Cantium will adhere to the requirements as set forth in the following documents, as applicable, to avoid or minimize impacts to any marine and coastal environments and habitats, biota, and threatened and endangered species:

- Appendices to the Biological Opinion on the Federally Regulated Oil and Gas Program in the Gulf of Mexico issued on March 13, 2020, and the amendment issued on April 26, 2021
  - Appendix A: “Seismic Survey Mitigation and Protected Species Observer Protocols”
  - Appendix B: “Marine Trash and Debris Awareness and Elimination Survey Protocols”
  - Appendix C: “Vessel Strike Avoidance and Injured/Dead Aquatic Protected Species Reporting Protocols”
  - Appendix J: “Sea Turtle Handling and Resuscitation Guidelines”

12.2 INCIDENTAL TAKES

Cantium 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:

- Appendices to the Biological Opinion on the Federally Regulated Oil and Gas Program in the Gulf of Mexico issued on March 13, 2020, and the amendment issued on April 26, 2021
  - Appendix A: “Seismic Survey Mitigation and Protected Species Observer Protocols”
  - Appendix B: “Marine Trash and Debris Awareness and Elimination Survey Protocols”
  - Appendix C: “Vessel Strike Avoidance and Injured/Dead Aquatic Protected Species Reporting Protocols”
  - Appendix J: “Sea Turtle Handling and Resuscitation Guidelines”

See **Section 6.7** for a list of Threatened and Endangered Species, Critical Habitat and Marine Mammal Information.

SECTION 13
RELATED FACILITIES AND OPERATIONS INFORMATION

13.1 RELATED OCS FACILITIES AND OPERATIONS

The subject well will be produced from existing Caisson No. 28. A 4-inch bulk oil lease term pipeline approximately 2,700 feet in length is installed to transport produced oil from Caisson No. 28 to K&N Platform in Bay Marchand Block 3. The maximum flow rate is 4,000 BOPD. The pipeline has a shut-in time of 45 seconds.

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.

The drilling unit, vessels, crew boats and supply boats associated with the operations proposed in this plan will not transit the Bryde's whale area.

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)
Tugboat	59,548 gal	2 / 0	2 total / 0
Supply boat	7,240 gal	3 / 1	7x week / 2x week
Crew boat	5,400 gal	1 / 1	7x week / 2x week
Helicopter	560 gal	As required	As required

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'	63,000 gal	weekly	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 WASTE AND SURPLUS ESTIMATED TO BE TRANSPORTED AND/OR DISPOSED OF ONSHORE

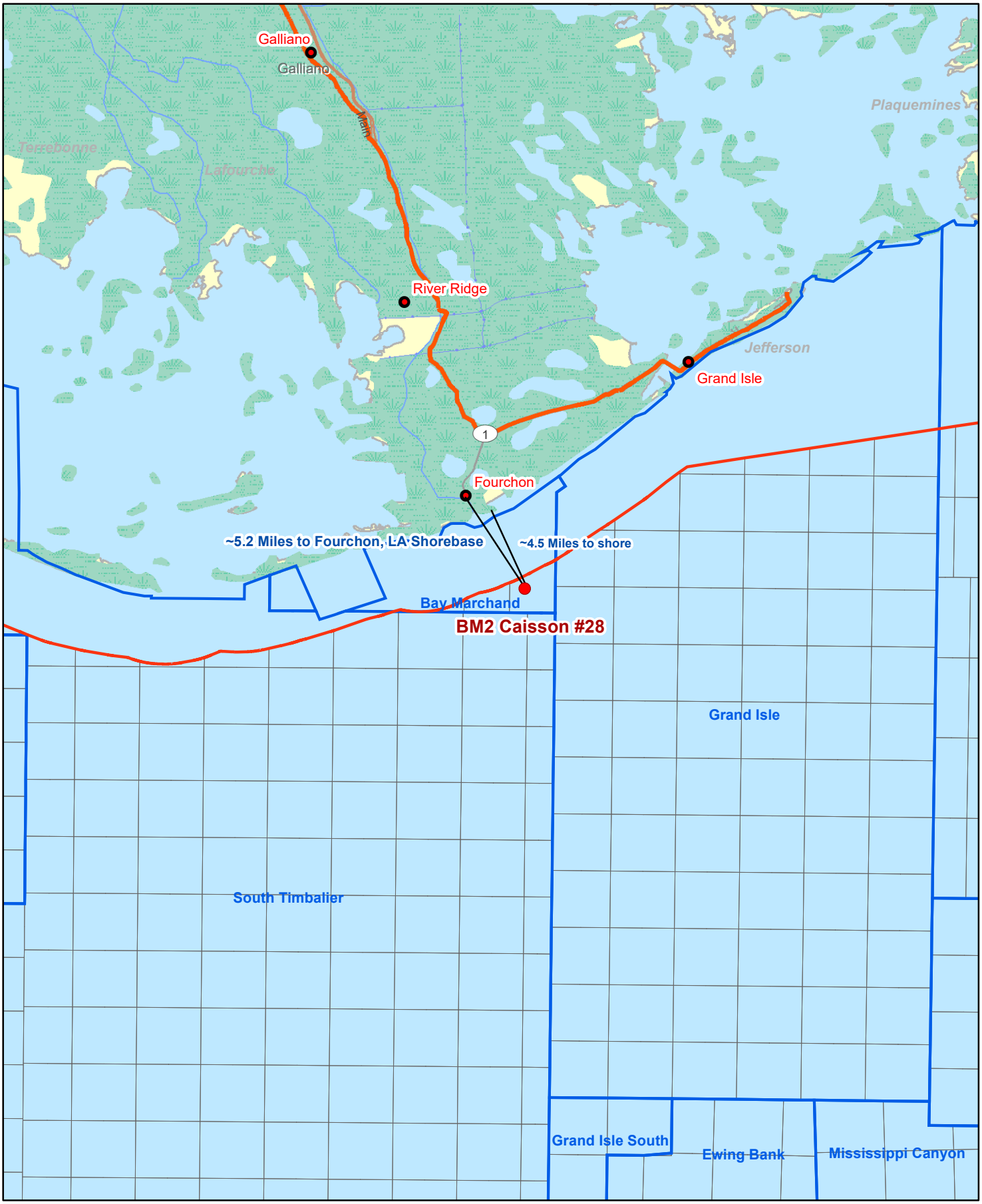
please specify whether the amount reported is a total or per well

	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.						
Water-based drilling fluid or mud	NA					
Synthetic-based drilling fluid or mud	NA					
Oil-based drilling fluid or mud	NA		Below deck storage tanks on offshore support vessels	R360 Environmental, Venice	7,500 bbls/well	Land Farming
Cuttings wetted with water-based fluid	NA					
Cuttings wetted with synthetic-based fluid	NA					
Cuttings wetted with oil-based fluids			Tote tanks on offshore support vessels	R360 Environmental, Venice	2,000 bbls/well	Land Farming
Will you produce hydrocarbons? If yes fill in for produced sand.						
Produced sand	NA					
Will you have additional wastes that are not permitted for discharge? If yes, fill in the appropriate rows.						
Trash and debris	Plastic, paper, aluminum		barged in a storage bin	Total Waste Solutions, Venice	7,500 lbs/well	Recycled or Land fill
Used oil	Oil		barged in 55 gal drums	R360 Environmental, Venice	15 drums/well	Recycled
Wash water	Water		Below deck storage tanks on offshore support vessels	R360 Environmental, Venice	1,250 bbls/well	Disposal
Chemical product wastes	Misc.		barged in a storage bin	R360 Environmental, Venice	500 lbs/well	Disposal
NOTE: If you will not have a type of waste, enter NA in the row.						

ATTACHMENT 14-B

Cantium, LLC

Vicinity Map
BM2 Caisson #28



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
C-Port One	Fourchon, Louisiana	Existing
Bristow Helicopters	Golden Meadow, Louisiana	Existing

15.2 SUPPORT BASE CONSTRUCTION OR EXPANSION

There will be no new construction of an onshore support base, nor will Cantium 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

Activities proposed in this plan are being conducted from an existing facility; therefore, Coastal Zone Management Certification is not required for this Plan.

SECTION 17
ENVIRONMENTAL IMPACT ANALYSIS (EIA)

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

ATTACHMENT 17-A

Cantium, LLC (Cantium)

Supplemental Development Operations Coordination Document
Bay Marchand Block 2
OCS-G 00369

(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_2S 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			(7)			
Vicinity of Offshore Location						
Essential fish habitat		X	X		X(6)	
Marine and pelagic birds	X				X	X
Public health and safety					(5)	
Coastal and Onshore						
Beaches					X(6)	X
Wetlands					X(6)	
Shore birds and coastal nesting birds					X(6)	X
Coastal wildlife refuges					X	
Wilderness areas					X	

Footnotes for Environmental Impact Analysis Matrix

1) Activities that may affect a marine sanctuary or topographic feature. Specifically, if the well or platform site or any anchors will be on the seafloor within the:
   - 4-mile zone of the Flower Garden Banks, or the 3-mile zone of Stetson Bank;
   - 1000-meter, 1-mile or 3-mile zone of any topographic feature (submarine bank) protected by the Topographic Features Stipulation attached to an Outer Continental Shelf (OCS) lease;
   - Essential Fish Habitat (EFH) criteria of 500 feet. from any no-activity zone; or
   - Proximity of any submarine bank (500-foot buffer zone) with relief greater than two 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 H_2S 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 activity 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 operations 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.

TABLE 1: 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	Gulf of Mexico Range
			Lease Area	Coastal		
Marine Mammals						
Manatee, West Indian	*Trichechus manatus latirostris*	T	--	X	Florida (peninsular)	Coastal Louisiana, Mississippi, Alabama, and Florida
Whale, Blue	*Balaenoptera masculus*	E	X[1]	--	None	GOM
Whale, Bryde's[4]	*Balaenoptera brydei/edeni*	E	X	--	None	Eastern GOM
Whale, Fin	*Balaenoptera physalus*	E	X[1]	--	None	GOM
Whale, Humpback	*Megaptera novaeangliae*	E	X[1]	--	None	GOM
Whale, North Atlantic Right	*Eubalaena glacialis*	E	X[1]	--	None	GOM
Whale, Rice's[4]	*Balaenoptera ricei*	E	X	--	None	GOM
Whale, Sei	*Balaenopiera borealis*	E	X[1]	--	None	GOM
Whale, Sperm	*Physeter catodon (=macrocephalus)*	E	X	--	None	GOM
Terrestrial Mammals						
Mouse, Alabama Beach	*Peromyscus polionotus ammobates*	E	-	X	Alabama beaches	Alabama beaches
Mouse, Choctawatchee Beach	*Peromyscus polionotus allophrys*	E	-	X	Florida panhandle beaches	Florida panhandle beaches
Mouse, Perdido Key Beach	*Peromyscus polionotus trissyllepsis*	E	-	X	Alabama, Florida (panhandle) beaches	Alabama, Florida (panhandle) beaches
Mouse, St. Andrew Beach	*Peromyscus polionotus peninsularis*	E	-	X	Florida panhandle beaches	Florida panhandle beaches
Jaguarundi, Gulf Coast	*Puma yagouaroundi cacomitli*	E	-	X	None	Texas
Ocelot	*Leopardus (=Felis) pardalis*	E	-	X	None	Texas

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico	Gulf of Mexico Range
			Lease Area	Coastal		
Bat, Florida Bonneted	*Eumops floridanus*	E	-	X	None	Florida
Panther, Florida	*Puma (=Felis) concolor coryi*	E	-	X	None	Florida
Vole, Florida Salt Marsh	*Microtus pennsylvanicus dukecampbelli*	E	-	X	None	Florida
Deer, Key	*Odocoileus virginianus clavium*	E	-	X	None	Florida Keys
Rabbit, Lower Keys Marsh	*Sylvilagus palustris hefneri*	E	-	X	None	Florida Keys
Rat, Silver Rice	*Oryzomys palustris natator*	E	-	X	None	Florida Keys
Birds						
Plover, Piping	*Charadrius melodus*	T	-	X	Coastal Texas, Louisiana, Mississippi, Alabama, and Florida (panhandle)	Coastal GOM
Crane, Whooping	*Grus Americana*	E	-	X	Coastal Texas	Coastal Texas and Louisiana
Crane, Mississippi sandhill	*Grus canadensis pulla*	E	-	X	Coastal Mississippi	Coastal Mississippi
Caracara, Audubon's Crested	*Polyborus plancus audubonii*	T	-	X	None	Coastal Florida Peninsula
Curlew, Eskimo	*Numenius borealis*	E	-	X	None	Coastal Texas
Falcon, Northern Aplomado	*Falco femoralis septentrionalis*	E	-	X	None	Coastal Texas
Prairie-chicken, Attwater's Greater	*Tympanuchus cupido attwateri*	E	-	X	None	Coastal Texas
Scrub-jay, Florida	*Aphelocoma coerulescens*	T	-	X	None	Coastal Florida
Kite, Everglade Snail	*Rostrhamus sociabilis plumbeus*	E	-	X	None	Coastal Southern Florida
Knot, Red	*Calidris canutus rufa*	T	-	X	None	Coastal GOM
Rail, Eastern Black	*Laterallus jamaicensis ssp. jamaicensis*	T	-	X	None	Coastal GOM
Sparrow, Cape Sable Seaside	*Ammodramus maritimus mirabilis*	E	-	X	Everglades	Coastal Florida

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico	Gulf of Mexico Range
			Lease Area	Coastal		
Stork, Wood	*Mycteria americana*	T	-	X	None	Coastal Alabama and Florida
Tern, Roseate	*Sterna dougallii dougallii*	T	-	X	None	Coastal Southern Florida
Warbler, Bachman's	*Vermivora bachmanii*	E	-	X	None	Coastal Southern Florida
Woodpecker, Red-cockaded	*Picoides borealis*	E	-	X	None	Coastal Louisiana and Florida
Marine Reptiles						
Sea Turtle, Green	*Chelonia mydas*	T/E[3]	X	X	None	GOM
Sea Turtle, Hawksbill	*Eretmochelys imbricata*	E	X	X	None	GOM
Sea Turtle, Kemp's Ridley	*Lepidochelys kempli*	E	X	X	None	GOM
Sea Turtle, Leatherback	*Dermochelys coriacea*	E	X	X	None	GOM
Sea Turtle, Loggerhead	*Caretta caretta*	T	X	X	Texas, Louisiana, Mississippi, Alabama, Florida	GOM
Terrestrial Reptiles						
Turtle, Alabama Red-bellied	*Pseudemys alabamensis*	E	-	X	None	Coastal Mississippi and Alabama
Crocodile, American	*Crocodylus acutus*	T	-	X	Everglades and Florida Keys	Coastal Florida
Snake, Eastern Indigo	*Drymarchon couperi*	T	-	X	None	Coastal Mississippi, Alabama, and Florida
Tortoise, Gopher	*Gopherus polyphemus*	T	-	X	None	Coastal Louisiana, Mississippi, and Alabama
Turtle, Ringed Map	*Graptemys oculifera*	T	-	X	None	Coastal Louisiana and Mississippi
Turtle, Yellow-blotched Map	*Graptemys flavimaculata*	T	-	X	None	Coastal Mississippi
Fish						
Sturgeon, Gulf	*Acipenser oxyrinchus (=oxyrhynchus) desotoi*	T	X	X	Coastal Louisiana, Mississippi, Alabama, and Florida (panhandle)	Coastal Louisiana, Mississippi, Alabama, and Florida (panhandle)
Shark, Oceanic Whitetip	Carcharhinus longimanus	T	X	_	None	GOM
Sawfish, Smalltooth	Pristis pectinate	E	-	X	None	Florida
Grouper, Nassau	Epinephelus striatus	T	-	X	Florida[5]	Florida
Ray, Giant Manta	Manta birostris	T	X	--	None	GOM
Sturgeon, Pallid	Scaphirhynchus albus	E	-	X	None	Louisiana Coastal Rivers

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico	Gulf of Mexico Range
			Lease Area	Coastal		
Corals						
Coral, Elkhorn	*Acopora palmate*	T	X[2]	X	Florida[5]	Flower Garden Banks and Florida
Coral, Staghorn	*Acopora cervicornis*	T	X	X	Florida[5]	Florida
Coral, Boulder Star	*Orbicella franksi*	T	X	X	Flower Garden Banks and Florida	Flower Garden Banks and Florida
Coral, Lobed Star	*Orbicella annularis*	T	X	X	Flower Garden Banks and Florida	Flower Garden Banks and Florida
Coral, Mountainous Star	*Orbicella faveolate*	T	X	X	Flower Garden Banks and Florida	Flower Garden Banks and Florida
Coral, Rough Cactus	*Mycetophyllia ferox*	T	-	X	Florida[5]	Florida and Southern Gulf of Mexico
Coral, Pillar	*Dendrogyra cylindrus*	T	-	X	Florida[5]	Florida

Abbreviations: E = Endangered; T = Threatened

1 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.

2 According to the 2017 EIS, Elkhorn Coral, while uncommon, has been found in the Flower Garden Banks. (BOEM 2017-009)

3 Green Sea Turtles are considered threatened throughout the Gulf of Mexico; however, the breeding population off the coast of Florida is considered endangered.

4 The Bryde's whale, also known as the Bryde's whale complex, is a collection of baleen whales that are still being researched to determine if they are the same species or if they are individual species of whales. In 2021, the Rice's whale, formerly known as the Gulf of Mexico Bryde's whale, was determined to be a separate species. There are less than 100 Rice's whales living in the Gulf of Mexico year-round. These whales retain all the protections of the Gulf of Mexico Bryde's whale under the Endangered Species Act while the regulations are being updated to reflect the name change. Other Bryde's whales are migratory and may enter the Gulf of Mexico; however, the migratory Bryde's whales are rare or extralimital in the Gulf of Mexico and are unlikely to be present in the lease area.

5 Critical habitat is in the Gulf of Mexico, but outside of planning area. Species may still occur in the Gulf of Mexico.

(B) Analysis

Site-Specific at Bay Marchand Block 2

Proposed operations consist of the installation of two strap-on conductors to Caisson No. 28 and drilling, completion, and production of one well (proposed Well No. 24) from Caisson No. 28.

Operations will be conducted with a Jackup Rig.

Cantium will drive one 20-24" drive pipe with a D90 impact hammer working dry to a depth of +/-230'. It is expected to take 5,500 strikes to set the drive pipe. Footage penetrated will be limited, not measured at strike per foot. Driving activities are expected to last 2 days at 18 hours per day. The drive pipe will be driven through layers of primarily marine sands, silts and clays. Sound attenuation will not be utilized.

1. Designated Topographic Features

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

Physical disturbances to the seafloor: Bay Marchand Block 2 is 45.9 miles from the closest designated Topographic Features Stipulation Block (Sackett); therefore, no adverse impacts are expected.

Effluents: Bay Marchand Block 2 is 45.9 miles from the closest designated Topographic Features Stipulation Block (Sackett); therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed operations (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-meter 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 meters, oil from a surface spill is not expected to 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 Cantium's Regional OSRP (refer to information submitted in **Section 9**).

If dispersants were utilized as a response method, the fate and effects of spilled oil would be impacted. Dispersants have been utilized in previous spill response efforts and were used extensively in the response to the Deepwater Horizon oil spill, with both surface and sub-surface applications. Reports on dispersant usage on surface oil indicate that a majority of the dispersed

oil remains in the top 10 meters of the water column, with 60 percent of the oil in the top two meters of water (McAuliffe et al, 1981; Lewis and Aurand, 1997; OCS Report BOEM 2017-007). Lubchenco et al. (2010) report that most chemically dispersed surface oil from the Deepwater Horizon explosion and oil spill remained in the top six meters of the water column where it mixed with surrounding waters and biodegraded (BOEM 2017-007). None of the topographic features or potentially sensitive biological features in the GOM are shallower than 10 meters (33 feet), and only the Flower Garden Banks are shallower than 20 meters (66 feet).

In one extraordinary circumstance with an unusual combination of meteorological and oceanographic conditions, a tropical storm forced a large volume of Deepwater Horizon oil spill-linked surface oil/dispersant mixture to as deep as 75 meters (246 feet), causing temporary exposure to mesophotic corals in the Pinnacle Trend area and leading to some coral mortality and sublethal impacts (Silva et al., 2015; BOEM 2017-007).

Additionally, concentrations of dispersed and dissolved oil in the Deepwater Horizon oil-spill subsea plume were reported to be in the parts per million range or less and were generally lower away from the water's surface and away from the well head (Adcroft et al., 2010; Haddad and Murawski, 2010; Joint Analysis Group, 2010; Lubchenco et al, 2010; BOEM 2017-007).

In the case of subsurface spills like a blowout or pipeline leak, dispersants may be injected at the seafloor. This will increase oil concentrations near the source but tend to decrease them further afield, especially at the surface. Marine organisms in the lower water column will be exposed to an initial increase of water-soluble oil compounds that will dilute in the water column over time (Lee et al., 2013a; NAS 2020).

Dispersant application involves a trade-off between decreasing the risk to the surface and shoreline habitat and increasing the risk beneath the surface. The optimal trade-off must account for various factors, including the type of oil spilled, the spill volume, the weather and sea state, the water depth, the degree of turbulence, and the relative abundance and life stages of organisms (NRC, 2005; NAS 2020).

Chemical dispersants may increase the risk of toxicity to subsurface organisms by increasing bioavailability of the oil. However, it is important to note that at the 1:20 dispersant-to-oil ratio - recommended for use during response operations, the dispersants currently approved for use are far less acutely toxic than oil is. Toxicity of chemically dispersed oil is primarily due to the oil itself and its enhanced bioavailability (Lee et al., 2015; NAS 2020).

With the exception of special Federal management areas or designated exclusion areas, dispersants have been preapproved for surface use, which provides the USCG On-Scene Coordinator with the authority to approve the use of dispersants. However, that approval would only be granted upon completion of the protocols defined in the appropriate Area Contingency Plan (ACP) and the Regional Response Team (RRT) Dispersant Plan. The protocols include conducting an

environmental benefit analysis to determine if the dispersant use will prevent a substantial threat to the public health or welfare or minimize serious environmental damage. The Regional Response Team would be notified immediately to provide technical support and guidance in determining if the dispersant use meets the established criteria and provide an environmental benefit. Additionally, there is currently no preapproval for subsea dispersant injection and the USCG On-Scene Coordinator must approve use of this technology before any subsea application. Due to the unprecedented volume of dispersants applied for an extended period of time, the U.S. National Response Team has developed guidance for atypical dispersant operations to ensure that planning and response activities will be consistent with national policy (BOEM 2017-007).

Dispersants were used extensively in the response to the Deepwater Horizon oil spill, both surface and sub-surface applications. However, during a May 2016 significant oil spill (approximately 1,926 barrels) in the Gulf of Mexico dispersants were not utilized as part of the response. The Regional Response Team was consulted and recommended that dispersants not be used, despite acknowledging the appropriate protocols were correctly followed and that there was a net environmental benefit in utilizing dispersants. This demonstrates that the federal authorities (USCG and RRT) will be extremely prudent in their decision-making regarding dispersant use authorizations.

Due to the distance of these blocks from a topographic area and the coverage of the activities proposed in this plan by Cantium's Regional OSRP (refer to information submitted in **Section 9**), impacts to topographic features from surface or sub-surface oil spills are not expected.

There are no other IPFs (including emissions and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact topographic features.

2. Pinnacle Trend Area Live Bottoms

Potential IPFs on pinnacle trend area live bottoms from the proposed operations include physical disturbances to the seafloor, emissions (noise / sound), effluents, and accidents.

Physical disturbances to the seafloor: Bay Marchand Block 2 is 102.8 miles from the closest live bottom (pinnacle trend) area; therefore, no adverse impacts are expected.

Emissions (noise / sound): All routine OCS oil-and gas-related activities have some element of sound generation. Common sound sources include propeller cavitation, rotating machinery, and reciprocating machinery, which are associated with routine OCS oil-and gas-related activities such as vessel traffic, drilling, construction, and oil and gas production, processing, and transport. Sound introduced into the marine environment as a result of human activities has the potential to affect marine organisms. Although there is little information available on sound detection and sound-mediated behaviors for marine invertebrates, the overall impacts on pinnacle and low-relief feature communities from anthropogenic noise are expected to be negligible (BOEM 2017-009).

Additionally, Bay Marchand Block 2 is 102.8 miles from the closest live bottom (pinnacle trend) area; therefore, no adverse impacts are expected.

Effluents: Bay Marchand Block 2 is 102.8 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 operations (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-meter 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 expected to impact pinnacle trend area live bottoms due to the distance of these blocks from a live bottom (pinnacle trend) area and the coverage of the. activities proposed in this plan by Cantium's Regional OSRP (refer to information submitted in **Section 9**).

If dispersants were utilized as a response method, the fate and effects of spilled oil would be impacted. A detailed discussion on dispersants, their usage during the Deepwater Horizon oil spill, and their impacts on different levels of benthic communities can be found in **Item 1**.

There are no other IPFs (including wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact a live bottom (pinnacle trend) area.

3. Eastern Gulf Live Bottoms

Potential IPFs on Eastern Gulf live bottoms from the proposed operations include physical disturbances to the seafloor, emissions (noise / sound), effluents, and accidents.

Physical disturbances to the seafloor: Bay Marchand Block 2 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.

Emissions (noise / sound): All routine OCS oil-and gas-related activities have some element of sound generation. Common sound sources include propeller cavitation, rotating machinery, and reciprocating machinery, which are associated with routine OCS oil-and gas-related activities such as vessel traffic, drilling, construction, and oil and gas production, processing, and transport. Sound introduced into the marine environment as a result of human activities has the potential to affect marine organisms. Although there is little information available on sound detection and sound-mediated behaviors for marine invertebrates, the overall impacts on pinnacle and low-relief feature communities from anthropogenic noise are expected to be negligible (BOEM 2017-009). Additionally, Bay Marchand Block 2 is not located in an area characterized by the existence of live bottoms; therefore, no adverse impacts are expected.

Effluents: Bay Marchand Block 2 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 operations (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-meter 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 expected to impact Eastern Gulf live bottoms due to the distance of these blocks from a live bottom area and coverage of the activities proposed in this plan by Cantium's Regional OSRP (refer to information submitted in **Section 9**).

If dispersants were utilized as a response method, the fate and effects of spilled oil would be impacted. A detailed discussion on dispersants, their usage during the Deepwater Horizon oil spill, and their impacts on different levels of benthic communities can be found in **Item 1**.

There are no other IPFs (including wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact an Eastern Gulf live bottom area.

4. Deepwater Benthic Communities

There are no IPFs (including emissions (noise / sound), effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal, and accidents) from the proposed operations that are likely to impact deepwater benthic communities.

Operations proposed in this plan are in water depths of 47 feet. High-density deepwater benthic communities are found only in water depths greater than 984 feet (300 meters); therefore, Cantium's proposed operations in Bay Marchand Block 2 are not likely to impact deepwater benthic communities.

5. Water Quality

Potential IPFs that could result in water quality degradation from the proposed operations in Bay Marchand Block 2 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. Additionally, an analysis of the best available information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 *Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico* (NMFS, 2020) concludes that exposures to toxicants in discharges from oil and gas activities are not likely to adversely affect ESA-listed species.

Accidents: Impact-producing factors related to OCS oil- and gas-related accidental events primarily involve drilling fluid spills, chemical spills, and oil spills.

Drilling Fluid Spills

Water-based fluid (WBF) and Synthetic-based fluid (SBF) spills may result in elevated turbidity, which would be short term, localized, and reversible. The WBF is normally discharged to the seafloor during riserless drilling, which is allowable due to its low toxicity. For the same reasons, a spill of WBF would have negligible impacts. The SBF has low toxicity, and the discharge of SBF is allowed to the extent that it adheres onto drill cuttings. Both USEPA Regions 4 and 6 permit the discharge of cuttings wetted with SBF as long as the retained SBF amount is below a prescribed percent, meets biodegradation and toxicity requirements, and is not contaminated with the formation oil or PAH. A spill of SBF may cause a temporary increase in biological oxygen demand and locally result in lowered dissolved oxygen in the water column. Also, a spill of SBF may release an oil sheen if formation oil is present in the fluid. Therefore, impacts from a release of SBF are considered to be minor. Spills of SBF typically do not require mitigation because SBF sinks in water and naturally biodegrades, seafloor cleanup is technically difficult, and SBF has low toxicity. (BOEM 2017-009)

Chemical Spills

Accidental chemical spills could result in temporary localized impacts on water quality, primarily due to changing pH. Chemicals spills are generally small volume compared with spills of oil and drilling fluids. During the period of 2007 to 2014, small chemical spills occurred at an average annual volume of 28 barrels, while large chemical spills occurred at an average annual volume of 758 barrels. These chemical spills normally dissolve in water and dissipate quickly through dilution with no observable effects. Also, many of these chemicals are approved to be commingled in produced water for discharge to the ocean, which is a permitted activity. Therefore, impacts from chemical spills are considered to be minor and do not typically require mitigation because of technical feasibility and low toxicity after dilution (BOEM 2017-009).

Oil Spills

Oil spills have the greatest potential of all OCS oil-and gas-related activities to affect water quality. Small spills (<1,000 barrels) are not expected to substantially impact water quality in coastal or

offshore waters because the oil dissipates quickly through dispersion and weathering while still at sea. Reasonably foreseeable larger spills (≥1,000 barrels), however, could impact water quality in coastal and offshore waters (BOEM 2017-007). However, based on data provided in the BOEM 2016 Update of Occurrence Rates for Offshore Oil Spills, it is unlikely that an accidental surface or subsurface spill of a significant volume would occur from the proposed operations. Between 2001 and 2015 OCS operations produced eight billion barrels of oil and spilled 0.062 percent of this oil, or one barrel for every 1,624 barrels produced. (The overall spill volume was almost entirely accounted for by the 2010 Deepwater Horizon blowout and subsequent discharge of 4.9 million barrels of oil. Additional information on unlikely scenarios and impacts from very large oil spills are discussed in the Catastrophic Spill Event Analysis white paper (BOEM 2017-007).

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. Dispersants will only be used if approved by the Regional Response Team in coordination with the RRT Dispersant Plan and RRT Biological Assessment for Dispersants.

Oil spills, regardless of size, may allow hydrocarbons to partition into the water column in a dissolved, emulsion, and/or particulate phase. Therefore, impacts from reasonably foreseeable oil spills are considered moderate. Mitigation efforts for oil spills may include booming, burning, and the use of dispersants (BOEM 2017-009).

These methods may cause short-term secondary impacts to water quality, such as the introduction of additional hydrocarbon into the dissolved phase through the use of dispersants and the sinking of hydrocarbon residuals from burning. Since burning and the use of dispersants put additional hydrocarbons into the dissolved phase, impacts to water quality after mitigation efforts are still considered to be moderate, because dissolved hydrocarbons extend down into the water column. This results in additional exposure pathways via ingestion and gill respiration and may result in acute or chronic effects to marine life (BOEM 2017-009).

Most oil-spill response strategies and equipment are based upon the simple principle that oil floats. However, as evident during the Deepwater Horizon explosion, oil spill, and response, this is not always true. Sometimes it floats and sometimes it suspends within the water column or sinks to the seafloor (BOEM 2017-009).

Oil that is chemically dispersed at the surface move into the top six meters (20 feet) of the water column where it mixes with surrounding waters and begins to biodegrade (U.S. Congress, Office of Technology Assessment, 1990). Dispersant use, in combination with natural processes, breaks up oil into smaller components that allows them to dissipate into the water and degrade more rapidly (Nalco, 2010). Dispersant use must be in accordance with an RRT Preapproved Dispersant

Use Manual and with any conditions outlined within a RRT's site-specific, dispersant approval given after a spill event. Consequently, dispersant use must be in accordance with the restrictions for specific water depths, distances from shore, and monitoring requirements. At this time, neither the Region IV nor the Region VI RRT dispersant use manuals, which cover the GOM region, give preapproval for the application of dispersant use subsea (BOEM 2017-009).

The activities proposed in this plan will be covered by Cantium's Regional Oil Spill Response Plan, which discusses potential response actions in more detail (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 treatment or disposal) from the proposed operations that are likely to impact water quality.

6. Fisheries

There are multiple species of fish in the Gulf of Mexico, including the endangered and threatened species listed in **Table 1** at the beginning of this Environmental Impact Assessment. More information regarding the endangered Gulf sturgeon (**Item 20.2**), oceanic whitetip shark (**Item 20.3**), and giant manta ray (**Item 20.4**) can be found below. Potential IPFs that could impact fisheries as a result of the proposed operations in Bay Marchand Block 2 include physical disturbances to the seafloor, emissions (noise / sound), 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.

Emissions (noise / sound): All routine OCS oil-and gas-related activities have some element of sound generation. Common sound sources include propeller cavitation, rotating machinery, and reciprocating machinery, which are associated with routine OCS oil-and gas-related activities such as vessel traffic, drilling, construction, and oil and gas production, processing, and transport. Sound introduced into the marine environment as a result of human activities has the potential to affect marine organisms by stimulating behavioral response, masking biologically important signals, causing temporary or permanent hearing loss (Popper et al., 2005; Popper et al., 2014), or causing physiological injury (e.g., barotrauma) resulting in mortality (Popper and Hastings, 2009). The potential for anthropogenic sound to affect any individual organism is dependent on the proximity to the source, signal characteristics, received peak pressures relative to the static pressure, cumulative sound exposure, species, motivation, and the receiver's prior experience. In addition, environmental conditions (e.g., temperature, water depth, and substrate) affect sound speed, propagation paths, and attenuation, resulting in temporal and spatial variations in the received signal for organisms throughout the ensonified area (Hildebrand, 2009).

Sound detection capabilities among fishes vary. For most fish species, it is reasonable to assume hearing sensitivity to frequencies below 500 Hertz (Hz) (Popper et al., 2003 and 2014; Popper and Hastings, 2009; Slabbekoorn et al., 2010; Radford et al., 2014). The band of greatest interest to this analysis, low-frequency sound (30-500 Hz), has come to be dominated by anthropogenic sources and includes the frequencies most likely to be detected by most fish species. For example, the noise generated by large vessel traffic typically results from propeller cavitation and falls within 40-150 Hz (Hildebrand, 2009; McKenna et al., 2012). This range is similar to that of fish vocalizations and hearing and could result in a masking effect.

Masking occurs when background noise increases the threshold for a sound to be detected; masking can be partial or complete. If detection thresholds are raised for biologically relevant signals, there is a potential for increased predation, reduced foraging success, reduced reproductive success, or other effects. However, fish hearing and sound production may be adapted to a noisy environment (Wysocki and Ladich, 2005). There is evidence that fishes are able to efficiently discriminate between signals, extracting important sounds from background noise (Popper et al., 2003; Wysocki and Ladich, 2005). Sophisticated sound processing capabilities and filtering by the sound sensing organs essentially narrows the band of masking frequencies, potentially decreasing masking effects. In addition, the low-frequency sounds of interest propagate over very long distances in deep water, but these frequencies are quickly lost in water depths between ½ and ¼ the wavelength (Ladich, 2013). This would suggest that the potential for a masking effect from low-frequency noise on behaviors occurring in shallow coastal waters may be reduced by the receiver's distance from sound sources, such as busy ports or construction activities.

Pulsed sounds generated by OCS oil-and gas-related activities (e.g., impact-driven piles and airguns) can potentially cause behavioral response, reduce hearing sensitivity, or result in physiological injury to fishes and invertebrate resources.

Impact pile-driving during OCS construction and on-lease seismic activity are both temporally and spatially limited activities. The effects of these sound-producing activities would extend only to communities of fishes and invertebrates within a relatively small area. Benthic fishes and invertebrates could receive sound waves propagated through the water and sound waves propagated through the substrate. However, Wardle et al. (2001) found that, although fishes and invertebrates associated with a reef exhibited a brief startle response when exposed to pulsed low-frequency signals, disruption of diurnal patterns was not observed. Fishes disturbed by the noise were observed to resume their previous activity within 1-2 seconds and only exhibited flight response if the airguns were visible when discharged (Wardle et al., 2001). Other studies of fishes exposed to pulsed anthropogenic sound signals in natural environments have produced a wide range of results suggesting that species, experience, and motivation are very important factors, and indicating that habituation may occur (Engås et al., 1996; Løkkeborg et al., 2012; Popper et al., 2014). Organisms in close proximity to a pulsed sound source are at increased risk of barotrauma. A signal with a very rapid rise and peak pressures that vary substantially from the static pressure at the receiver's location can cause physiological injury or mortality (Popper et al., 2014). However, the range at which physiological injury may occur is short (<10 meters; <33 feet) and,

given fish avoidance behavior, the potential for widespread impacts to populations as a result of physiological injury is negligible.

Support vessel traffic, drilling, production facilities, and other sources of continuous sounds contribute to a chronic increase in background noise, with varying areas of effect that may be influenced by the sound level, frequencies, and environmental factors (Hildebrand, 2009; Slabbekoorn et al., 2010; McKenna et al., 2012). These sources have a low potential for causing physiological injury or injuring hearing in fishes and invertebrates (Popper et al., 2014). However, continuous sounds have an increased potential for masking biologically relevant sounds than do pulsed signals. The potential effects of masking on fishes and invertebrates are difficult to assess in the natural setting for communities and populations of species, but evidence indicates that the increase to background noise as a result of OCS oil and gas operations would be relatively minor. Therefore, it is expected that the cumulative impact to fishes and invertebrate resources would be minor and would not extend beyond localized disturbances or behavioral modification.

Despite the importance of many sound-mediated behaviors and the potential biological costs associated with behavioral response to anthropogenic sounds, many environmental and biological factors limit potential exposure and the effects that OCS oil-and gas-related sounds have on fishes and invertebrate resources. The overall impact to fishes and invertebrate resources due to anthropogenic sound introduced into the marine environment by OCS oil-and gas-related routine activities is expected to be minor.

Cantium will drive one 20-24" drive pipe with a D90 impact hammer working dry to a depth of +/-230'. It is expected to take 5,500 strikes to set the drive pipe. Footage penetrated will be limited, not measured at strike per foot. Driving activities are expected to last 2 days at 18 hours per day. The drive pipe will be driven through layers of primarily marine sands, silts and clays. Sound attenuation will not be utilized.

Cantium will monitor for marine life both before and during the proposed pile driving operations from a vantage point which will allow Cantium to monitor according to the 157-meter range noted in the National Marine Fisheries Service *Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico* (NMFS 2020), "Table 94 Additional distance over which the daily cumulative exposure to pile-driving sound can affect the hearing of sea turtles and sperm whales" (refer to information submitted in **Section A**).

Cantium will also adhere to requirements as set forth in Notices to Lessees and guidelines listed in **Section F**, **Section I**, and **Section L** of this plan, as applicable, to avoid or minimize impacts to any of the species listed in the ESA as a result of these operations.

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 meters of the discharge point and are expected to have negligible effect on fisheries. Additionally, an analysis of the best available information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 *Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico* (NMFS, 2020) concludes that exposures to toxicants in discharges from oil and gas activities are not likely to adversely affect ESA-listed species.

Accidents: Collisions between support vessels and ESA-listed fish, would be unusual events; however, should one occur, death or injury to ESA-listed fish is possible. Contract vessel operators can avoid protected aquatic species and reduce potential deaths by maintaining a vigilant watch and a distance of 50 meters or greater, with the exception of animals that approach the vessel. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico OCS.

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

Should an ESA-listed fish (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) be entrapped, entangled, or injured, personnel should contact the ESA Section 7 biologist at (301) 427-8413 (nmfs.psoreview@noaa.gov) and report all incidents to takereport.nmfsser@noaa.gov. After making the appropriate notifications, Cantium may call BSEE at (985) 722-7902 for questions or additional guidance on recovery assistance needs, continued monitoring requirements, and incidental report information which at minimum is detailed below. Additional information may be found at the following website: https://www.fisheries.noaa.gov/report. Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and 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.

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 operations (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 Cantium's Regional OSRP (refer to information submitted in **Section 9**).

There are no other IPFs (including wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact fisheries.

7. Marine Mammals

The latest population estimates for the Gulf of Mexico 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. The Rice's whale (née Gulf of Mexico Bryde's whale) is the only commonly occurring baleen whale in the northern Gulf of Mexico and has been sighted off western Florida and in the De Soto Canyon region. Florida manatees have been sighted along the entire northern GOM but are mainly found in the shallow coastal waters of Florida, which are unassociated with the proposed operations. A complete list of all endangered and threatened marine mammals in the GOM may be found in **Table 1** at the beginning of this Environmental Impact Assessment. More information regarding the endangered Rice's whale can be found in **Item 20.1** below. Potential IPFs to marine mammals as a result of the proposed operations in Bay Marchand Block 2 include emissions (noise / sound), effluents, discarded trash and debris, and accidents.

Emissions (noise / sound): Noises from drilling activities, support vessels and helicopters (i.e., non-impulsive anthropogenic sound) 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). Responses to sound exposure may include lethal or nonlethal injury, temporary hearing impairment, behavioral harassment and stress, or no apparent response. Noise-induced stress is possible, but it is little studied in marine mammals. Tyack (2008) suggests that a more significant risk to marine mammals from sound are these less visible impacts of chronic exposure. There is little conclusive evidence for long-term displacements and population trends for marine mammals relative to noise.

Vessels are the greatest contributors to increases in low-frequency ambient sound in the sea (Andrew et al. 2011). Sound levels and tones produced are generally related to vessel size and speed. Larger vessels generally emit more sound than smaller vessels, and vessels underway with a full load, or those pushing or towing a load, are noisier than unladen vessels. Cetacean responses to aircraft depend on the animals' behavioral state at the time of exposure (e.g., resting, socializing, foraging, or traveling) as well as the altitude and lateral distance of the aircraft to the animals (Luksenburg and Parsons 2009). The underwater sound intensity from aircraft is less than produced by vessels, and visually, aircraft are more difficult for whales to locate since they are not in the water and move rapidly (Richter et al. 2006). Perhaps not surprisingly then, when aircraft are at higher altitudes, whales often exhibit no response, but lower flying aircraft (e.g., approximately 500 meters or less) have been observed to elicit short-term behavioral responses (Luksenburg and Parsons 2009; NMFS 2017b; NMFS 2017f; Patenaude et al. 2002; Smultea et al. 2008a; Wursig et al. 1998). Thus, aircraft flying at low altitude, at close lateral distances and above shallow water elicit stronger responses than aircraft flying higher, at greater lateral distances and

over deep water (Patenaude et al. 2002; Smultea et al. 2008a). Routine OCS helicopter traffic would not be expected to disturb animals for extended periods, provided pilots do not alter their flight patterns to more closely observe or photograph marine mammals. Helicopters, while flying offshore, generally maintain altitudes above 700 feet during transit to and from a working area, and at an altitude of about 500 feet between platforms. The duration of the effects resulting from a startle response is expected to be short-term during routine flights, and the potential effects will be insignificant to sperm whales and Rice's whales. Therefore, we find that any disturbance that may result from aircraft associated with the proposed operations is not likely to adversely affect ESA-listed whales.

Drilling and production noise would contribute to increases in the ambient noise environment of the GOM, but they are not expected in amplitudes sufficient to cause either hearing or behavioral impacts (BOEM 2017-009). There is the possibility of short-term disruption of movement patterns and/or behavior caused by vessel noise and disturbance; however, these are not expected to impact survival and growth of any marine mammal populations in the GOM. Additionally, the National Marine Fisheries Service published a final recovery plan for the sperm whale, which identified anthropogenic noise as either a low or unknown threat to sperm whales in the GOM (USDOC, NMFS, 2010b). Sirenians (i.e., manatees) are not located within the area of operations. Additionally, there were no specific noise impact factors identified in the latest BOEM environmental impact statement for sirenians related to GOM OCS operations (BOEM 2017-009). See **Item 20.1** for details on the Rice's whale.

The National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion Appendix C explains how operators must implement measures to minimize the risk of vessel strikes to protected species and report observations of injured or dead protected species. This guidance should also minimize the chance of marine mammals being subject to the increased noise level of a service vessel in very close proximity.

Cantium will drive one 20-24" drive pipe with a D90 impact hammer working dry to a depth of +/-230'. It is expected to take 5,500 strikes to set the drive pipe. Footage penetrated will be limited, not measured at strike per foot. Driving activities are expected to last 2 days at 18 hours per day. The drive pipe will be driven through layers of primarily marine sands, silts and clays. Sound attenuation will not be utilized.

Exposure to sound from pile driving activities may result in temporary hearing loss or other behavioral responses in sperm whales, including some local displacement from the area for as long as the pile driving activity is occurring. An analysis of the best available information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion concludes that the potential impacts of this exposure are not anticipated to have adverse effects because sperm whales are expected to be moving and less likely to remain stationary during pile driving activities.

Cantium will monitor for marine life both before and during the proposed pile driving operations from a vantage point which will allow Cantium to monitor according to the 157-meter range noted

in the National Marine Fisheries Service *Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico* (NMFS 2020), "Table 94 Additional distance over which the daily cumulative exposure to pile-driving sound can affect the hearing of sea turtles and sperm whales" (refer to information submitted in **Section A**).

Mid-frequency cetaceans (i.e., sperm whales) sound exposure thresholds in the *Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico* (NMFS 2020), "Table 61 Impulsive acoustic permanent threshold shift and temporary threshold shift onset criteria [to] the species groups considered in this consultation", show permanent hearing loss at 230 dB and temporary hearing loss at 224 dB. According to "Table 92 Sound source levels for different steel pile sizes used for offshore construction", the peak sound level when driving 24-inch piles (the nearest available size comparison for these operations) is approximately 213 dB, which is below the limit for permanent hearing loss and temporary hearing loss.

Cantium will also adhere to requirements as set forth in Notices to Lessees and guidelines listed in **Section F**, **Section I**, and **Section L** of this plan, as applicable, to avoid or minimize impacts to any of the species listed in the ESA as a result of these operations.

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 operations is not expected to substantially harm marine mammals. 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 marine mammals, including 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 of 500 meters or greater from baleen whales, 100 meters or greater from sperm whales, and a distance of 50 meters or greater from all other aquatic protected species, with the exception of animals that approach the vessel. If unable to identify the marine mammal, the vessel will act as if it were a baleen whale and maintain a distance of 500 meters or greater. If a manatee is sighted, all vessels in the area will operate at "no wake/idle" speeds in the area, while maintaining proper distance. When assemblages of cetaceans are observed, including mother/calf pairs, vessel speeds will be reduced to 10 knots or less. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico OCS.

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

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 (877) WHALE-HELP (877-942-5343). Additional information may be found at the following website: https://www.fisheries.noaa.gov/report. Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and 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.

These proposed operations will not utilize moon pools to conduct activities.

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

operations (refer to **Item 5**, Water Quality). Oil spill response activities may increase vessel traffic in the area, which could impact cetacean behavior and/or distribution, thereby causing additional stress to the animals. The effect of oil dispersants on cetaceans is not known. Removing oil from the surface would reduce the likelihood of oil adhering to marine mammals. Laboratory experiments have shown that the dispersants used during the Deepwater Horizon response are cytotoxic to sperm whale cells; however, it is difficult to determine actual exposure levels in the GOM. Therefore, dispersants will only be used if approved by the Regional Response Team in coordination with the RRT Dispersant Plan and RRT Biological Assessment for Dispersants. The acute toxicity of oil dispersant chemicals included in Cantium'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 Cantium's OSRP (refer to information submitted in accordance with **Section 9**).

The NMFS Office of Protected Resources coordinates agency assessment of the need for response and leads response efforts for spills that may impact cetaceans. If a spill may impact cetaceans, NMFS Protected Resources Contacts should be notified (see contact details below), and they will initiate notification of other relevant parties.

NMFS Protected Resources Contacts for the Gulf of Mexico:

- Marine mammals – Southeast emergency stranding hotline 1-877-433-8299
- Other endangered or threatened species – ESA section 7 consulting biologist: nmfs.ser.emergency.consult@noaa.gov

There are no other IPFs (including physical disturbances to the seafloor) from the proposed operations that are likely to impact marine mammals.

8. Sea Turtles

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; Lohoefener et al., 1990). Deep waters may be used by all species as a transitory habitat. A complete list of endangered and threatened sea turtles in the GOM may be found in **Table 1** at the beginning of this Environmental Impact Assessment. Additional details regarding the loggerhead sea turtle's critical habitat in the GOM are located in **Item 20.5**. Potential IPFs that could impact sea turtles as a result of the proposed operations include emissions (noise / sound), effluents, discarded trash and debris, and accidents.

Emissions (noise / sound): Noise from drilling activities, support vessels, and helicopters (i.e., non-impulsive anthropogenic sound) may elicit a startle reaction from sea turtles, but this is a temporary disturbance. Responses to sound exposure may include lethal or nonlethal injury, temporary hearing impairment, behavioral harassment and stress, or no apparent response. Vessels are the greatest contributors to increases in low-frequency ambient sound in the sea (Andrew et al.

2011). Sound levels and tones produced are generally related to vessel size and speed. Larger vessels generally emit more sound than smaller vessels, and vessels underway with a full load, or those pushing or towing a load, are noisier than unladen vessels. Routine OCS helicopter traffic would not be expected to disturb animals for extended periods, provided pilots do not alter their flight patterns to more closely observe or photograph marine mammals. Helicopters, while flying offshore, generally maintain altitudes above 700 feet during transit to and from a working area, and at an altitude of about 500 feet between platforms. The duration of the effects resulting from a startle response is expected to be short-term during routine flights and the potential effects will be insignificant to sea turtles. Therefore, we find that any disturbance that may result from aircraft associated with the proposed operations is not likely to adversely affect sea turtles. Construction and operational sounds other than pile driving should have insignificant effects on sea turtles; effects would be limited to short-term avoidance of construction activity itself rather than the sound produced. As a result, sound sources associated with support vessel movement as part of the proposed operations are insignificant and therefore are not likely to adversely affect sea turtles.

Overall noise impacts on sea turtles from the proposed operations are expected to be negligible to minor depending on the location of the animal(s) relative to the sound source and the frequency, intensity, and duration of the source. The National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion Appendix C explains how operators must implement measures to minimize the risk of vessel strikes to protected species and report observations of injured or dead protected species. This guidance should also minimize the chance of sea turtles being subject to the increased noise level of a service vessel in very close proximity.

Cantium will drive one 20-24" drive pipe with a D90 impact hammer working dry to a depth of +/-230'. It is expected to take 5,500 strikes to set the drive pipe. Footage penetrated will be limited, not measured at strike per foot. Driving activities are expected to last 2 days at 18 hours per day. The drive pipe will be driven through layers of primarily marine sands, silts and clays. Sound attenuation will not be utilized.

Cantium will monitor for marine life both before and during the proposed pile driving operations from a vantage point which will allow Cantium to monitor according to the 157-meter range noted in the National Marine Fisheries Service *Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico* (NMFS 2020), "Table 94 Additional distance over which the daily cumulative exposure to pile-driving sound can affect the hearing of sea turtles and sperm whales" (refer to information submitted in **Section A**).

Sea turtle sound exposure thresholds in the *Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico* (NMFS 2020), "Table 72. Sea turtle sound exposure thresholds", show permanent hearing loss at 232 dB and temporary hearing loss at 226 dB. According to "Table 92 Sound source levels for different steel pile sizes used for offshore construction", the peak sound level when driving 24-inch piles (the nearest available size comparison for these operations) is approximately 213 dB, which is below the limit for permanent hearing loss and temporary hearing loss.

Cantium will also adhere to requirements as set forth in Notices to Lessees and guidelines listed in **Section F**, **Section I**, and **Section L** of this plan, as applicable, to avoid or minimize impacts to any of the species listed in the ESA as a result of these operations.

Exposure to sound from pile driving activities may result in hearing loss and temporary loss of available habitat for sea turtles, including some local displacement from the area for as long as the pile driving activity is occurring. An analysis of the best available information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion concludes that the impact of this exposure is not anticipated to be significant for adult sea turtles because the continuous "banging" of a pile should provide ample warning to avoid the immediate pile-driving area. Juvenile sea turtles may be motivated to remain in *Sargassum* habitat and may not leave the area, which could cause hearing loss; the juveniles that do leave the area may be adversely affected by being displaced from *Sargassum* habitat. The annual number of predicted disturbances of oceanic juveniles is relatively low.

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 operations is not expected to substantially harm sea turtles. 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 of 50 meters or greater when they are sighted, with the exception of sea turtles that approach the vessel. 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 as well as other marine protected species (i.e., Endangered Species Act listed species). Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

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). Additional information may be found at the following website: https://www.fisheries.noaa.gov/report. Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and 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.

These proposed operations will not utilize moon pools to conduct activities

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 operations (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 Cantium's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Section 9**).

The NMFS Office of Protected Resources coordinates agency assessment of the need for response and leads response efforts for spills that may impact sea turtles. If a spill may impact sea turtles, the following NMFS Protected Resources Contacts should be notified, and they will initiate notification of other relevant parties.

- Dr. Brian Stacy at brian.stacy@noaa.gov and 352-283-3370 (cell); or
- Stacy Hargrove at stacy.hargrove@noaa.gov and 305-781-7453 (cell)

There are no other IPFs (including physical disturbances to the seafloor) from the proposed operations that are likely to impact sea turtles.

9. Air Quality

Potential IPFs that could impact air quality as a result of the proposed operations include accidents.

Bay Marchand Block 2 is located 64 miles from the Breton Wilderness Area and 4.5 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 operations. Plan Emissions for the proposed operations 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 Bay Marchand Block 2 from the coastline. There are no other IPFs (including effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact air quality.

10. Shipwreck Sites (known or potential)

In accordance with BOEM NTL 2005-G07, Cantium will submit an archaeological resource report per 30 CFR 550.194 if directed to do so by the Regional Director.

Potential IPFs that could impact known or unknown shipwreck sites as a result of the proposed operations in Bay Marchand Block 2 include disturbances to the seafloor and accidents. Should Cantium discover any evidence of a shipwreck, they will immediately halt operations within a 1000-foot radius, report to BOEM within 48 hours, and make every reasonable effort to preserve and protect that cultural resource.

Physical Disturbances to the seafloor: Bay Marchand Block 2 is not located in or adjacent to an OCS block designated by BOEM as having a high probability for occurrence of shipwrecks; therefore, no adverse impacts are expected.

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 operations (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Cantium's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Section 9**).

There are no other IPFs (including emissions, effluents, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact shipwreck sites.

11. Prehistoric Archaeological Sites

In accordance with BOEM NTL 2005-G07, Cantium will submit an archaeological resource report per 30 CFR 550.194 if directed to do so by the Regional Director.

Potential IPFs which could impact prehistoric archaeological sites as a result of the proposed operations in Bay Marchand Block 2 include physical disturbances to the seafloor and accidents. Bay Marchand Block 2 is located outside the Archaeological Prehistoric high probability line, therefore, no adverse impacts are expected. Should Cantium discover any object of prehistoric archaeological significance, they will immediately halt operations within a 1000-foot radius, report to BOEM within 48 hours, and make every reasonable effort to preserve and protect that cultural resource.

Physical Disturbances to the seafloor: Bay Marchand Block 2 is not located in or adjacent to an OCS block designated by BOEM as having a high probability for occurrence of archaeological sites; therefore, no adverse impacts are expected.

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 operations (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Cantium's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Section 9**).

There are no other IPFs (including emissions, effluents, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact prehistoric archaeological sites.

Vicinity of Offshore Location

12. Essential Fish Habitat (EFH)

Potential IPFs that could impact EFH as a result of the proposed operations in Bay Marchand Block 2 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: Turbidity and sedimentation resulting from the bottom disturbing activities included in the proposed operations would be short term and localized. Fish are mobile and would avoid these temporarily suspended sediments. Additionally, the Live Bottom Low Relief Stipulation, the Live Bottom (Pinnacle Trend) Stipulation, and the Eastern Gulf Pinnacle Trend Stipulation have been put in place to minimize the impacts of bottom disturbing activities. Therefore, the bottom disturbing activities from the proposed operations would have a negligible impact on EFH.

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 operations (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Cantium's Regional OSRP (refer to information submitted in **Section 9**).

There are no other IPFs (including emissions and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact essential fish habitat.

13. Marine and Pelagic Birds

Potential IPFs that could impact marine birds as a result of the proposed operations include emissions (air, noise / sound), accidental oil spills, and discarded trash and debris from vessels and the facilities.

Emissions:

Air Emissions

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

Noise / Sound Emissions

The OCS oil-and gas-related helicopters and vessels have the potential to cause noise and disturbance. However, flight altitude restrictions over sensitive habitat, including that of birds, may make serious disturbance unlikely. Birds are also known to habituate to noises, including airport noise. It is an assumption that the OCS oil-and gas-related vessel traffic would follow regular routes; if so, seabirds would find the noise to be familiar. Therefore, the impact of OCS oil-and gas-related noise from helicopters and vessels to birds would be expected to be negligible.

The use of explosives for decommissioning activities may potentially kill one or more birds from barotrauma if a bird (or several birds because birds may occur in a flock) is present at the location of the severance. For the impact of underwater sound, a threshold of 202 dB sound exposure level (SEL) for injury and 208 dB SEL for barotrauma was recommended for the Brahyramphus marmoratus, a diving seabird (USDOI, FWS, 2011). However, the use of explosive severance of facilities for decommissioning are not included in these proposed operations, therefore these impacts are not expected.

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 operations (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 Cantium'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, 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 operations will seldom interact with marine and pelagic birds; therefore, the effects will be negligible.

ESA bird species: Seven species found in the GOM are listed under the ESA. BOEM consults on these species and requires mitigations that would decrease the potential for greater impacts due to small population size.

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

14. Public Health and Safety Due to Accidents.

There are no IPFs (including emissions, effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal, and accidents, including an accidental H_2S releases) from the proposed operations which could impact 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 operations be classified by BSEE as H_2S absent.

Coastal and Onshore

15. Beaches

Potential IPFs from the proposed operations that could impact beaches include accidents and discarded trash and debris.

Accidents: Oil spills contacting beaches would have impacts on the use of recreational beaches and associated resources. Due to the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by Cantium'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 operations. 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact beaches.

16. Wetlands

Salt marshes and seagrass beds fringe the coastal areas of the Gulf of Mexico. Due to the distance from shore (4.5 miles), accidents 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, type 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 operations (refer to **Item 5**, Water quality). If a spill were to occur, response capabilities as outlined in Cantium'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 operations. 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact wetlands.

17. Shore Birds and Coastal Nesting Birds

Elmer's Island Wildlife Refuge (10.4 miles from Bay Marchand Block 2) 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 Elmer's Island Wildlife Refuge 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. Potential IPFs from the proposed operations that could impact shore birds and coastal nesting birds include accidents and discarded trash and debris.

Accidents: Oil spills could impact 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 waterfowl, may be the hardest hit indirectly through destruction of their feeding habitat and/or food source (Hansen, 198l;

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 operations (refer to **Item 5**, Water quality). Due to the distance from shore (4.5 miles), Cantium 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, 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact shore birds and coastal nesting birds.

18. Coastal Wildlife Refuges

Bay Marchand Block 2 is approximately 10.4 miles from the Elmer's Island Wildlife Refuge. Management goals of the Elmer's Island Wildlife Refuge are waterfowl habitat management, marsh restoration, providing sanctuary for nesting and wintering seabirds, and providing sandy beach habitat for a variety of wildlife species. Potential IPFs from the proposed operations that could impact this coastal wildlife refuge are accidents and discarded trash and debris.

Impacts to shore birds and coastal nesting birds and to the beach are discussed in **Items 15 and 17**. Other wildlife species found on the refuges include nutria, rabbits, raccoons, alligators, and loggerhead turtles. Impacts to loggerhead turtles are discussed in **Item 20.5**.

Accidents: It is unlikely that an oil spill would occur from the proposed operations (refer to **Item 5**, Water quality). Due to the response capabilities that would be implemented, no impacts are expected. The activities proposed in this plan will be covered by Cantium'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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact coastal wildlife refuges.

19. Wilderness Areas

Potential IPFs that could impact wilderness areas as a result of the proposed operations include accidents and discarded trash and debris.

Accidents: An accidental oil spill from the proposed operations could impact wilderness areas. However, it is unlikely that an oil spill would occur from the proposed operations (refer to **Item 5**, Water Quality). Due to the distance from the nearest designated Wilderness Area (64 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 Cantium'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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact wilderness areas.

20. Other Environmental Resources Identified

20.1 – Rice's Whale (née Gulf of Mexico Bryde's Whale)

The Bryde's whale, also known as the Bryde's whale complex, is a collection of baleen whales that are still being researched to determine if they are the same species or if they are individual species of whales. In 2021, the Rice's whale, formerly known as the Gulf of Mexico Bryde's whale, was determined to be a separate species from other Bryde's whales. There are less than 100 Rice's whales living in the Gulf of Mexico year-round. These whales retain all the protections of the Gulf of Mexico Bryde's whale under the Endangered Species Act while the regulations are being updated to reflect the name change.

The Rice's whale (née Gulf of Mexico Bryde's whale) is the only commonly occurring baleen whale in the northern Gulf of Mexico and has been sighted off western Florida and in the De Soto Canyon region. The Rice's whale area is over 117.2 miles from the proposed operations. Additionally, vessel traffic associated with the proposed operations will not flow through the Rice's whale area. Therefore, there are no IPFs from the proposed operations that are likely to impact the Rice's whale. Additional information on marine mammals may be found in **Item 7**.

Bay Marchand Block 2 is located in the Rice's whales' core distribution area as defined by NMFS (NOAA 2019). According to the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 *Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico* (NMFS, 2020), the four most significant threats to the Rice's whales are sound, vessel collisions, energy exploration, and oil spills and oil spill response. Therefore, the potential IPFs to the Rice's whale as a result of the proposed operations include emissions (noise / sound), effluents, discarded trash and debris, and accidents. Additional information on marine mammals may be found in **Item 7**.

Emissions (noise / sound): Shipping traffic and oil and gas exploration and development activities produce a large amount of low frequency sound (less than 100 Hz) that falls within the hearing range of the Gulf of Mexico Rice's whales. Similar to other baleen whales, these whales may rely on their hearing to perform critical life functions such as navigation, communications, and mating. Therefore, it is possible that sound from the proposed operations may impact the Gulf of Mexico Rice's whale and disrupt their normal activities. Additional information on how sound may impact marine mammals can be found in **Item 7**.

Effluents: Drilling fluids and cuttings discharges contain components which may be detrimental to the Gulf of Mexico Rice's whales. 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: The limited amount of marine debris, if any, resulting from the proposed operations is not expected to substantially harm the Gulf of Mexico Rice's whales.

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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 the Rice's whale would be unusual events. Only one vessel strike of a Rice's whale has ever been recorded. However, should one occur, death or injury to the whale is possible. Contract vessel operators can avoid Rice's whales and reduce potential deaths by maintaining a vigilant watch and a safe distance of 500 meters or greater, with the exception of animals that approach the vessel. It is recommended to reduce vessel speeds to 10 knots or less when a Rice's whale is spotted. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as the Rice's whale, Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico OCS.

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

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 (877) WHALE-HELP (877-942-5343). Additional information may be found at the following website:

https://www.fisheries.noaa.gov/report. Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and 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.

These proposed operations will not utilize moon pools to conduct activities.

Oil spills have the potential to cause sublethal oil-related injuries and spill-related deaths to the Rice's whales. However, it is unlikely that an accidental oil spill would occur from the proposed operations (refer to **Item 5**, Water Quality). Oil spill response activities may increase vessel traffic in the area, which could add to changes in the Gulf of Mexico Rice's whale behavior and/or distribution, thereby causing additional stress to the animals. The effect of oil dispersants on cetaceans is not known. Removing oil from the surface would reduce the likelihood of oil adhering to marine mammals. Laboratory experiments have shown that the dispersants used during the Deepwater Horizon response are cytotoxic to sperm whale cells; however, it is difficult to determine actual exposure levels in the GOM. Therefore, dispersants will only be used if approved by the Regional Response Team in coordination with the RRT Dispersant Plan and RRT Biological Assessment for Dispersants. The acute toxicity of oil dispersant chemicals included in Cantium'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 Cantium's OSRP (refer to information submitted in accordance with **Section 9**).

The NMFS Office of Protected Resources coordinates agency assessment of the need for response and leads response efforts for spills that may impact cetaceans. If a spill may impact cetaceans, NMFS Protected Resources Contacts should be notified (see contact details below), and they will initiate notification of other relevant parties.

NMFS Protected Resources Contacts for the Gulf of Mexico:

- Marine mammals – Southeast emergency stranding hotline 1-877-433-8299
- Other endangered or threatened species – ESA section 7 consulting biologist: nmfs.ser.emergency.consult@noaa.gov

There are no other IPFs (including physical disturbances to the seafloor and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact marine mammals.

20.2 – Gulf Sturgeon

The Gulf sturgeon resides primarily in inland estuaries and rivers from Louisiana to Florida and a small population of the species enters the Gulf of Mexico seasonally in western Florida. Potential IPFs from the proposed operations that could impact the Gulf sturgeon include accidents, emissions (noise / sound), and discarded trash and debris. Additional information on ESA-listed fish may be found in **Item 6**.

Accidents: Collisions between support vessels and the Gulf sturgeon would be unusual events: however, should one occur, death or injury to the Gulf sturgeon is possible. Contract vessel operators can avoid protected aquatic species and reduce potential deaths by maintaining a vigilant watch and a distance of 50 meters or greater, with the exception of animals that approach the vessel. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico OCS.

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

Should an ESA-listed fish (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) be entrapped, entangled, or injured, personnel should contact the ESA Section 7 biologist at (301) 427-8413 (nmfs.psoreview@noaa.gov) and report all incidents to takereport.nmfsser@noaa.gov. After making the appropriate notifications, Cantium may call BSEE at (985) 722-7902 for questions or additional guidance on recovery assistance needs, continued monitoring requirements, and incidental report information which at minimum is detailed below. Additional information may be found at the following website: https://www.fisheries.noaa.gov/report. Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and 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.

Due to the distance from the nearest identified Gulf sturgeon critical habitat (64.2 miles) and the response capabilities that would be implemented during a spill, no significant adverse impacts are expected to the Gulf sturgeon. Considering the information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, the location of this critical habitat in relation to proposed operations, the likely dilution of oil reaching nearshore areas, and the on-going weathering and dispersal of oil over time, we do not anticipate the effects from oil spills will appreciably diminish the value of Gulf sturgeon designated critical habitat for the

conservation of the species. The activities proposed in this plan will be covered by Cantium's Regional OSRP (refer to information submitted in **Section 9)**.

Emissions (noise / sound): All routine OCS oil-and gas-related activities have some element of sound generation. Common sound sources include propeller cavitation, rotating machinery, and reciprocating machinery, which are associated with routine OCS oil-and gas-related activities such as vessel traffic, drilling, construction, and oil and gas production, processing, and transport. Sound introduced into the marine environment as a result of human activities has the potential to affect marine organisms**.** The National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion found that construction and operational sounds other than pile driving will have insignificant effects on Gulf sturgeon (NMFS, 2020). Although pile driving operations will be conducted as previously noted, due to the distance from the nearest identified Gulf sturgeon critical habitat (64.2 miles, using the closest area / block location as a measuring point; Bay Marchand Block 2) sound emissions from pile driving are not expected to impact Gulf sturgeons.

Discarded trash and debris: Trash and debris are not expected to impact the Gulf sturgeon. There will only be a limited amount of marine debris, if any, resulting from the proposed operations. 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 (including effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact the Gulf sturgeon.

20.3 – Oceanic Whitetip Shark

Oceanic whitetip sharks may be found in tropical and subtropical waters around the world, including the Gulf of Mexico (Young 2016). According to the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, Essential Fish Habitat (EFH) for the oceanic whitetip shark includes localized areas in the central Gulf of Mexico and Florida Keys. Oceanic whitetip sharks were listed as threatened under the Endangered Species Act in 2018 due to worldwide overfishing. Oceanic whitetip sharks had an abundant worldwide population, which has been threatened in recent years by inadequate regulatory measures governing fisheries; therefore, there is little research regarding the impact of oil and gas operations on oceanic whitetip sharks (NMFS, 2020). IPFs that have been determined by NMFS to be discountable to oceanic whitetip sharks include vessel strike, emissions (noise / sound), discharges, entanglement and entrapment, and marine debris. IPFs that could impact oceanic whitetip sharks as a result of the proposed operations in Bay Marchand Block 2 include accidents. Additional information on ESA-listed fish may be found in **Item 6**.

Accidents: Collisions between support vessels and the oceanic whitetip shark would be unusual events, however, should one occur, death or injury to the oceanic whitetip shark is possible. Contract vessel operators can avoid protected aquatic species and reduce potential deaths by maintaining a vigilant watch and a distance of 50 meters or greater, with the exception of animals that approach the vessel. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico OCS.

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

Should an ESA-listed fish (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) be entrapped, entangled, or injured, personnel should contact the ESA Section 7 biologist at (301) 427-8413 (nmfs.psoreview@noaa.gov) and report all incidents to takereport.nmfsser@noaa.gov. After making the appropriate notifications, Cantium may call BSEE at (985) 722-7902 for questions or additional guidance on recovery assistance needs, continued monitoring requirements, and incidental report information which at minimum is detailed below. Additional information may be found at the following website: https://www.fisheries.noaa.gov/report. Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's

equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and 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.

There is little information available on the impacts of oil spills or dispersants on oceanic whitetip sharks. It is expected that exposure of oil or dispersants to oceanic whitetip sharks would likely result in effects similar to other marine species, including fitness reduction and the possibility of mortality (NMFS, 2020). Due to the sparse population in the Gulf of Mexico, it is possible that a small number of oceanic whitetip sharks could be impacted by an oil spill. However, it is unlikely that such an event would occur from the proposed operations (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Cantium's Regional OSRP (refer to information submitted in **Section 9**).

Discarded trash and debris: There is little available information on the effects of marine debris on oceanic whitetip sharks. Since these sharks are normally associated with surface waters, they may be susceptible to entanglement. However, due to the small, widely dispersed, and highly mobile population in the Gulf of Mexico, and the localized and patchy distribution of marine debris, it is extremely unlikely that oceanic whitetip sharks would be impacted by marine debris.

There will only be a limited amount of marine debris, if any, resulting from the proposed operations. 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 (including effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact oceanic whitetip sharks.

20.4 – Giant Manta Ray

According to the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, the giant manta ray lives in tropical, subtropical, and temperate oceanic waters and productive coastlines throughout the Gulf of Mexico. While uncommon in the Gulf of Mexico, there is a population of approximately 70 giant manta rays in the Flower Garden Banks National Marine Sanctuary (Miller and Klimovich 2017). Giant manta rays were listed as threatened under the Endangered Species Act in 2018 due to worldwide overfishing. Giant manta rays had an abundant worldwide population, which has been threatened in recent years by inadequate regulatory measures governing fisheries; therefore, there is little research regarding the impact of oil and gas operations on giant manta rays (NMFS, 2020). IPFs that have been determined by NMFS to be discountable to giant manta rays include vessel strike, emissions (noise / sound), discharges, entanglement and entrapment, and marine debris. IPFs that could impact giant manta rays as a result of the proposed operations in Bay Marchand Block 2 include accidents. Additional information on ESA-listed fish may be found in **Item 6**.

Accidents: Collisions between support vessels and the giant manta ray would be unusual events, however, should one occur, death or injury to the giant manta ray is possible. Contract vessel operators can avoid protected aquatic species and reduce potential deaths by maintaining a vigilant watch and a distance of 50 meters or greater, with the exception of animals that approach the vessel. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico OCS.

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

Should an ESA-listed fish (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) be entrapped, entangled, or injured, personnel should contact the ESA Section 7 biologist at (301) 427-8413 (nmfs.psoreview@noaa.gov) and report all incidents to takereport.nmfsser@noaa.gov. After making the appropriate notifications, Cantium may call BSEE at (985) 722-7902 for questions or additional guidance on recovery assistance needs, continued monitoring requirements, and incidental report information which at minimum is detailed below. Additional information may be found at the following website: https://www.fisheries.noaa.gov/report. Any injured or dead

protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and 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.

There is little information available on the impacts of oil spills or dispersants on giant manta rays. It is expected that exposure of oil or dispersants to giant manta rays would likely result in effects similar to other marine species, including fitness reduction and the possibility of mortality (NMFS, 2020). It is possible that a small number of giant manta rays could be impacted by an oil spill in the Gulf of Mexico. However, due to the distance to the Flower Garden Banks (127.5 miles), the low population dispersed throughout the Gulf of Mexico, and the response capabilities that would be implemented during a spill, no significant adverse impacts are expected to impact giant manta rays. Additionally, it is unlikely that such an event would occur from the proposed operations (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by Cantium's Regional OSRP (refer to information submitted in **Section 9**).

Discarded trash and debris: There is little available information on the effects of marine debris on giant manta rays. Since these sharks are normally associated with surface waters, they may be susceptible to entanglement. However, due to the small, widely dispersed, and highly mobile population in the Gulf of Mexico, and the localized and patchy distribution of marine debris, it is extremely unlikely that oceanic whitetip sharks would be impacted by marine debris.

There will only be a limited amount of marine debris, if any, resulting from the proposed operations. 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).

Cantium will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion 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. Cantium will also collect and remove flotsam resulting from activities related to proposed operations.

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 Cantium 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 (including effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the proposed operations that are likely to impact giant manta rays.

20.5 – Loggerhead Sea Turtle

The loggerhead sea turtles are large sea turtles that inhabit continental shelf and estuarine environments throughout the temperate and tropical regions of the Atlantic Ocean, with nesting beaches along the northern and western Gulf of Mexico. NMFS issued a Final Rule in 2014 (79 FR 39855) designating a critical habitat including 38 marine areas within the Northwest Atlantic Ocean, with seven of those areas residing within the Gulf of Mexico. These areas contain one or a combination of habitat types: nearshore reproductive habitats, winter areas, breeding areas, constricted migratory corridors, and/or *Sargassum* habitats.

There are multiple IPFs that may impact loggerhead sea turtles (see **Item 8**). However, the closest loggerhead critical habitat is located 118.1 miles from Bay Marchand Block 2; therefore, no adverse impacts are expected to the critical habitat. Additionally, considering the information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, we do not expect proposed operations to affect the ability of *Sargassum* to support adequate prey abundance and cover for loggerhead turtles.

20.6 - Protected Corals

Protected coral habitats, including designated critical habitats, are noncontiguous and occur in the Flower Garden Banks National Marine Sanctuary and Florida. Five banks in the Flower Garden Banks National Marine Sanctuary have been designated as critical habitats for boulder star (Orbicella franksi), lobed star (Orbicella annularis), and mountainous star (Orbicella faveolate) corals. Elkhorn coral can also be found in the Flower Garden Banks, though the area is not a designated critical habitat for this coral. Various coastal counties in Florida are also designated as critical habitats for protected coral species. These coral habitats are located outside of the planning area and are not expected to be impacted by the proposed operations. The following table comprehensively details the designated critical habitat for each protected coral species in the Flower Garden Banks National Marine Sanctuary and Florida.

		Protected Corals						
		Elkhorn Coral *Acopora palmate*	Staghorn Coral *Acopora cervicornis*	Boulder Star Coral *Orbicella franksi*	Lobed Star Coral *Orbicella annularis*	Mountainous Star Coral *Orbicella faveolate*	Rough Cactus Coral *Mycetophyllia ferox*	Pillar Coral *Dendrogyra cylindrus*
Designated Critical Habitat	**Flower Garden Banks National Marine Sanctuary**							
	East Flower Garden Bank			X	X	X		
	West Flower Garden Bank			X	X	X		
	Rankin Bank			X	X	X		
	Rankin Bank			X	X	X		
	Geyer Bank			X	X	X		
	McGrail Bank			X	X	X		
	Florida (outside of planning area)							
	Martin County					X		
	Palm Beach County	X	X	X	X	X		X
	Broward County	X	X	X	X	X	X	X
	Miami-Dade County	X	X	X	X	X	X	X
	Monroe County	X	X	X	X	X	X	X

Potential IPFs to protected corals from the proposed operations include accidents.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed operations (refer to statistics in **Item 5**, Water Quality). Oil spills cause damage to corals only if the oil contacts the organisms. Due to the distance from the Flower Garden Banks National Marine Sanctuary (127.5 miles) and other critical coral habitats, no adverse impacts are expected. The operations proposed in this plan will be covered by Cantium's Regional OSRP (refer to information submitted in **Section 9**).

There are no other IPFs (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for disposal) from the proposed operations that are likely to impact protected corals.

20.7 - Endangered Beach Mice

There are four subspecies of endangered beach mouse that are found in the dune systems along parts of Alabama and northwest Florida. Due to the location of Bay Marchand Block 2 and the beach mouse critical habitat (above the intertidal zone), there are no IPFs that are likely to impact endangered beach mice.

20.8 - Navigation

The current system of navigation channels around the northern GOM is believed to be generally adequate to accommodate traffic generated by the future Gulfwide OCS Program. As exploration and development activities increase on deepwater leases in the GOM, port channels may need to be expanded to accommodate vessels with deeper drafts and longer ranges. However, current navigation channels will not be changed, and new channels will not be required as a result of the activities proposed in this plan.

(C) IMPACTS ON PROPOSED OPERATIONS

The site–specific environmental conditions have been taken into account for the proposed operations. No impacts are expected on the proposed operations 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, Bay Marchand Block 2 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 operations 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 operations. Therefore, a list of such entities has not been provided.

(H) PREPARER(S)

Audrey Montalbano
J. Connor Consulting, Inc.
19219 Katy Freeway, Suite 200
Houston, Texas 77094
281-578-3388
Audrey.montalbano@jccteam.com

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

- Hazard Surveys

SECTION 18
ADMINISTRATIVE INFORMATION

18.1 EXEMPTED INFORMATION DESCRIPTION

The proposed bottomhole location of the planned well has 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

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