



**Proteus Oil Pipeline Company, LLC**

c/o Shell Pipeline Company LP  
150 N. Dairy Ashford  
Houston, TX 77079

November 28, 2017

Bureau of Safety and  
Environmental Enforcement  
Attention: Ms. Angie Gobert, GE1035A  
1201 Elmwood Park Blvd.  
New Orleans, LA 70123

**RE: APPLICATION FOR INSTALLATION OF NEW RIGHT-OF-WAY PLATFORM TO BE BRIDGE-CONNECTED  
TO EXISTING SOUTH PASS 89E ROW PLATFORM (DESIGNATION WILL BE SP89E-B)  
ROW MODIFICATION - OCS-G23429 (STRUCTURAL AND SURFACE SAFETY SYSTEM FACILITIES)**

Dear Ms. Gobert:

In accordance with the provisions contained in Title 30 CFR 250.842, and Title 30 CFR 250.900, Proteus Oil Pipeline Company, LLC ("Proteus") hereby submits the following data and drawings applicable to the structure and the surface safety system to be installed on the proposed bridge-connected Proteus Platform (SP89E-B) South Pass Area Block 89, Offshore Louisiana. The primary function of the new SP89E-B platform is to upgrade the existing pipeline hub platform at SP89E to improve operational safety and capacity. The new bridge-connected platform will support a HIPPS System and allow pigging of all incoming and departing pipelines. Both SP89E and SP89E-B Platforms are Operated by Shell Pipeline Company LP.

The proposed SP89E-B platform will be a manned structure with a normal complement of three to five operators. Provisions will include permanent twelve-person living quarters on the platform with provision for a twelve-person temporary quarters during construction activities. The SP89E-B Platform will support the Topsides facilities required for the SP89E Expansion and provide tie-in points and risers for the Shell Pipeline Company LP Mattox 24" oil pipeline (Segment 19658, OCS-G29352) and a new Proteus 4" fuel gas pipeline (Segment 19735, OCS-G29368).

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Detailed descriptions of the features of the proposed SP89E-B platform are included in the attached Structural Permit Application, SP89E-B, OCS-G23429, dated August 2017.

In accordance with NTL 2007-G20, Coastal Zone Management Consistency Certification has been received from Louisiana Department of Natural Resources (C20160213, copy enclosed). Email confirmation was received from LADNR's Carol Crapanzano on August 21, 2017, stating the authorization includes the proposed platform.

Proteus hereby certifies that the mechanical flow system will be designed and installed under the supervision of registered professional engineers. Maintenance of the system shall be by qualified personnel. All design data shall be kept on file at Shell Pipeline Company LP's office at 150 N. Dairy Ashford, Houston, TX 77079.

Detailed descriptions of the features provided in the Proteus safety system, along with any protective measures taken, are included in the attached Safety Analysis Function Evaluation (SAFE) Charts, as required by 30 CFR, Subpart H and further defined in API RP 14C, "0010, Analysis, Design, Installation and Testing of Basic Surface Safety System on Offshore Production Platforms."

A Firewater Monitor shall be installed on the northwest corner of the Main Deck of SP89E-B Platform. The location of the Firewater Monitor on SP89E-B provides an excellent vantage point for personnel to direct the stream of the Firewater Monitor onto the existing SP89E Platform. In accordance with the provisions of 30 CFR 250 Part 859, Proteus hereby requests the approval to utilize a dry chemical firefighting system on the existing SP89E Platform (unmanned) which will provide adequate and equivalent fire protection for the platform. The firefighting system is further described in Section 7 of the Facility Permit Package. Also included is a firewater risk assessment for the existing SP89E Platform. (GM020-SE-STI-226-F14-0010, Rev. B01).

In support of this application, please find the following information –

1. Permit Package Document – Structural Application SP89E-B Platform
2. Permit Package Document – Facility Permit Application SP89E-B Platform
  - a. Process Flow Diagrams
  - b. Safety Flow Diagrams
  - c. Safety Analysis Function Evaluation Charts (SAFE Charts)
  - d. General Arrangement Layouts
  - e. Safety Equipment Layouts
  - f. Fire Equipment Layouts
  - g. Fire Gas Detection Layouts

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- h. Fire Water Coverage
- i. Electrical Area Classification Layouts
- j. Piping Diagrams
- k. Certification Statement
- l. Fire Prevention and Control Systems Risk Assessment

3. Facility Design Basis

The platform is scheduled to commence operations on or about 2Q, 2019. Prior to commencement of operations, your office will be notified so that an on-site inspection can be performed.

The associated fees can be confirmed as follows:

ROW Modification \$4,169 – Agency Tracking No. 75372287090 (pay.gov receipt enclosed)

Platform Application \$3,256 – Agency Tracking No. 75372297380 (pay.gov receipt enclosed)

Should you have any questions or require additional information, please contact Denise McGuire, Sr. Land Agent – Offshore, Shell Pipeline Company, LP at 832-762-2487 or [Denise.McGuire@Shell.com](mailto:Denise.McGuire@Shell.com)

Please send approvals to the attention of Denise McGuire at Proteus Oil Pipeline Company LP, c/o Shell Pipeline Company, LP, 150 N. Dairy Ashford, Houston, TX 77079 and [Denise.McGuire@Shell.com](mailto:Denise.McGuire@Shell.com).

Sincerely,



Kimberly M. Bragg  
Vice President

Ms. Angie Gobert  
Bureau of Safety and  
Environmental Enforcement  
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**STATEMENT OF CERTIFICATION**

**PROTEUS OIL PIPELINE COMPANY, LLC**

**SOUTH PASS AREA BLOCK 89E-B BRIDGE-CONNECTED PLATFORM**

The design of this structure has been certified by a recognized classification society, or a registered civil or structural engineer or equivalent, or a naval architect or marine engineer or equivalent, specializing in the design of offshore structures. The certified design and as-built plans and specifications will be on file at 501 Westlake Park Boulevard, Houston, TX, 77079.

**Proteus Oil Pipeline Company, LLC**

Signed: Kimberly M. Bragg  
Kimberly M. Bragg

Title: Vice President

Date: November 28, 2017