

eni us operating co. inc. 1200 Smith, Suite 1700 Houston, TX 77002 Tel. 713-393-6100 Fax 713-393-6205

February 23, 2017

Ms. Angie Gobert Field Operations, Pipeline Section Bureau of Safety and Environmental Enforcement 1201 Elmwood Park Boulevard New Orleans, LA 70123-2394

### SUBJECT: FLUSH AND FILL EXTENSION REQUEST ROW PIPELINE SEGMENT 18228

Ms. Gobert:

Eni US Operating Co. Inc (Eni) respectfully requests an extension from the requirements of 30 CFR 250.1006(b)(2) for the ROW pipeline segment referenced below:

Segment No.	ROW	Origin	Destination	Size/Service	Out of Service Date
18228	G29065	WC 130 B G12761	WC 153 SSTI G32110	6" GAS	May 5, 2015

Eni US Operating Co. Inc (Eni) is requesting an extension for the requirement to flush and fill segment 18228 until July 31, 2017. Eni recently received an INC for failure to flush and fill within one year of out of service from the Lake Charles District.

Eni submitted abandonment procedures to your office on February 1, 2017. The extension to flush and prepare this pipeline for abandonment will allow for Eni to consolidate resources to complete the work concurrent with the abandonment schedule.

Eni appreciates your consideration in this matter and look forward to your response. If you have any questions or need additional information please contact Trisha Hackett at (337) 354-8015.

cerel

Brenda Montalvo SEQ Regulatory Manager

CC: Fieldwood Energy

Departure is hereby approved pursuant to 30 CFR 250.142.7

Date:

(for) Bryan A. Domangue Acting Regional Supervisor Bureau of Safety and Environmental Enforcement

Bureau of Safety and Environmental Enforcement (BSEE) RECEIVED

MAR 02 2017

Office of Field Operations Pipeline Section

BitH 5/18/2017

May 18, 2017

#### In Reply Refer To: GE 1035A

Mr. Franco Picciani Eni US Operating Co. Inc. 1200 Smith Street, Suite 1700 Houston, Texas 77002

Dear Mr. Picciani:

Reference is made to your request dated February 1, 2017, with supplemental data submitted on May 8, 2017, to relinquish Pipeline Right-of-way (ROW) OCS-G29065 and to decommission in place the associated pipeline segment number (PSN) 18228

Segment	Size	Length	Service	From	То
Number	(Inches)	(feet)			
18228	6	31,317	Gas	Platform B	16-inch SSTI
			West Cameron Area	West Cameron Area	
				Block 130	Block 153

For ease of reference, PSN 18228 is described as follows:

Pipeline Segment Number 18228 has been out of service since May 5, 2015. Since Eni US Operating Co. Inc. did not apply for and receive approval to maintain the Pipeline ROW grant OCS- G29065 in effect beyond the 90 days provided for by a temporary cessation of operations, please be advised that the Pipeline ROW grant OCS- G29065 expired on August 3, 2015. Accordingly, your request to relinquish the subject Pipeline ROW grant cannot be considered.

The approval is subject to the following:

Our review indicates that your proposed activities are in the vicinity of the unidentified magnetic anomalies listed in the Enclosure 1, features that may represent significant archaeological resources. In accordance with 30 CFR 250.1007(a)(5), you must either (1) conduct an underwater archaeological investigation (diver and/or ROV investigations) prior to commencing activities to determine whether these features represent archaeological resources, or (2) ensure that all seafloor disturbing actions resulting from the proposed activities avoid the unidentified features by a distance greater than that listed in the Enclosure 1. If you conduct an underwater archaeological investigation prior to commencing operations, contact either Dr. Jack Irion at (504) 736-1742 or Dr. Christopher Horrell at (504) 736-2796 at least two weeks prior to performing operations to obtain the investigation methodology. If you choose to avoid the features, submit anchor position plats, at a scale of 1-in. = 1,000-ft. with DGPS accuracy, with

your decommissioning report required by 30 CFR 250.1753(b). These plats must depict the "as-placed" location of all anchors, anchor chains, wire ropes and cables on the seafloor (including sweep) and demonstrate that the features were not physically impacted by the decommissioning activities. If you choose to avoid the features and no anchoring activities were conducted during pipeline decommissioning, provide a statement to that effect in lieu of the required anchor position plats.

In accordance with 30 CFR 250.1751, your request to decommission this pipeline is hereby approved, and in accordance with 30 CFR 250.1010(h), the requirement that the pipeline be removed is hereby waived.

Pursuant to 30 CFR 250.141, your request to use an alternate procedure, flushing the pipeline until free of hydrocarbons, from 30 CFR 250.1751(b), the requirement to pig the pipeline, is hereby approved.

The aforementioned decommissioning operations must be completed within 180 days of the date of this letter and a decommissioning completion report must be submitted to this office within 30 days of completing the decommissioning.

Sincerely,

# (org. sgd.) P. Smith

(for) Bryan A. Domangue Acting Regional Supervisor Regional Field Operations

### Enclosure No. 1

Magnetic Anomalies

		Shot					Minimum Avoidance
Area/	Block	Line Number	Point Number	Intensity (Gammas)	Duratior (Feet)	n Coordinates	Distance (Feet)
WC	129	33	13	25	713	X= 128941 Y= 29494	
NO	100	20	10	5.0	0.0.0	LAT= 29.45870100 LON=-93.56623652	2 3
WC	129	32	13	58	236	X= 1289399 Y= 29194 LAT= 29.450451453	5
WC	129	25	25	14	197	LON= -93.5661156 X= 129997	9 D 150
						Y= 29791 LAT= 29.46742868 LON=-93.53324095	8
WC	129	29	26	5	98	X= 130194 Y= 29847	C
WC	129	31	26	27	487	LAT= 29.46905852 LON=-93.52708495 X= 130292	5
						Y= 29841 LAT= 29.46894510	6
WC	129	34	40	17	408	LON=-93.52400231 X= 130299 Y= 29785	0 300
WC	129	35	26	6	204	LAT= 29.46740905 LON=-93.52374874	7
WC	129	30	20	6	394	X= 129617 Y= 30081 LAT= 29.47518734	D
WC	129	17	31	7	148	LON=-93.54535544 X= 129602 Y= 30091	0 150
						LAT= 29.47546807 LON=-93.54583312	В
WC	129	21	36	20	192	X= 129800 Y= 30324 LAT= 29.48197940	5
						LON=-93.53975281	
Side-	Scan	Sonar '	Targets				Minimum Avoidance
Area/	Block		tometer ciation	Dimens LxWxH(		Coordinates	Distance (Feet)
WC	129	1	NO			X= 1288695 Y= 293500	250
						LAT= 29.454689655	

LON=-93.568394159

Side-S		onar Targets Magnetometer	Dimensions			Minimum Avoidance Distance
Area/B	lock	Association	LxWxH(Feet)	Coord	dinates	(Feet)
WC	129	NO			1288695 293500 454689655 568394159	250

bc: 1502-01 Segment No. 18228 ROW OCS- G29065 with application (GE 1035A) 1502-01 Segment No. 18228 ROW OCS- G29065 (Scanning) (GE 274E) PSmith: Segment No. 18228



1

eni us operating

1200 Smith Street, Suite 1700 Houston, TX 77002 Tel. 713-393-6100 Fax 713-393-6205

February 1, 2017

Regional Supervisor Bureau of Safety and Environmental Enforcement (BSEE) Pipelines Section 1201 Elmwood Park Blvd. New Orleans, Louisiana 70123-2394

Attention: Ms. Angie Gobert

Re: Relinquishment and Proposed Abandonment In-Place of Right-of-Way Pipeline – 6" GAS (Segment No. 18228, ROW G29065), Originating at West Cameron Block 130, Platform B and Terminating at West Cameron Block 153, 16-inch SSTI, OCS Federal Waters, Offshore, Louisiana

Ms. Gobert:

Eni US Operating Co. Inc. (Eni) herein applies, in triplicate, for the relinquishment and abandonment of the pipeline listed below, pursuant to the authority granted in The Outer Continental Shelf Lands Act as amended (43 U.S.C. 1331 et seq.) and in compliance with the regulations contained in Title 30 CFR Subpart J, Pipelines and Pipeline Right-of-Way. Pipeline information is as follows:

Segment Number	ROW	Origin	Terminus	OD	Length	Product	Operator
18228	G29065	WC130 B	WC153 SSTI	6"	31317'	GAS	ENI US Operating Co. Inc.

Regarding the pipeline abandonment in place:

- Eni requests a departure from 30 CFR 250.1010(h), which requires removal of a ROW pipeline. Eni requests to abandon this pipeline in-place.
- Eni requests a waiver from pigging the line. In lieu of pigging, the pipeline will be flushed with seawater until free of hydrocarbons.

In support of this application, please find the following attached:

- Proposed Pipeline Abandonment Procedure & Subsea Tie-in Schematic
- PayGov receipt in the amount of \$2,170.00 to cover the processing fee for the Application to Decommission the Right-of-Way Pipeline.

Please direct any questions concerning this application to Erin Rachal at (713) 969-1311. Please direct any technical questions to Esau Velazquez, Sr. Project Manager at (713) 969-1363.

Sincerely,

Franco Picciani VP Technical Services



FEB 0 3 2017

Office of Field Operations Pipeline Section

# Pay gov

# Receipt

Your payment is complete Pay.gov Tracking ID: 260F00P7 Agency Tracking ID: 75177705365 Form Name: Application to Decommission a pipeline - ROW Application Name: BSEE Application to Decommission a ROW Pipeline - BU **Payment Information** Payment Type: Debit or credit card Payment Amount: \$2,170.00 Transaction Date: 02/02/2017 02:02:44 PM EST Payment Date: 02/02/2017 Region: Gulf of Mexico Contact : Erin Rachal 713-969-1311 Company Name/No: ENI US Operating Co. Inc., 02782 Pipeline Segment No: 18228 Originating Area/Block: West Cameron WC, 130 Terminating Area/Block: West Cameron WC, 153 Account Information Cardholder Name: Fieldwood Energy LLC Card Type: Master Card

Card Number: \*\*\*\*\*\*\*\*7372

**Email Confirmation Receipt** 

No confirmation email was provided during the creation of this transaction.

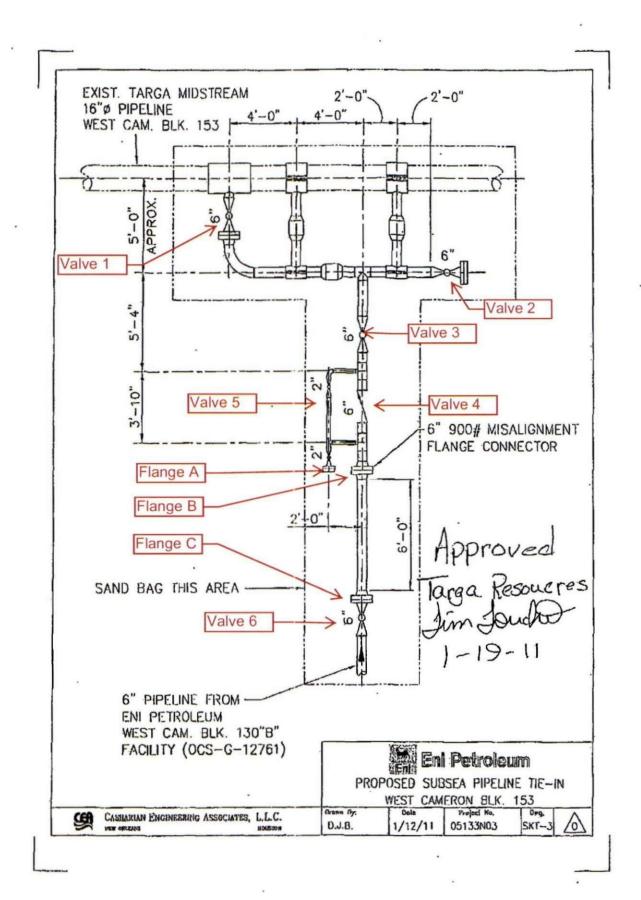
#### Eni US Operating Co. Inc. Pipeline Segment No. 18228 Originating at West Cameron 130 B and Terminating at West Cameron 153 16SSTI (Targa) Proposed Pipeline Abandonment Procedure

#### General Information

18228
6" Gas
1300
31,317'
1,095 bbls

#### Abandonment Procedure

- 1. Mobilize and set up filtration crew at VR 60 A- and DSV at VR 60 12--in SSTI.
- 2. The receiving crew at the WC 130 B Platform will isolate the pipeline from the production system. They will then insure that discharge from the pipeline is "lined up" to the equipment to be used to handle displaced fluids from the pipeline being abandoned. All hydrocarbons will be captured for proper disposal while water will be tested and processed as needed before being discharged overboard.
- 3. DSV at the WC 153 16-in SSTI will:
  - Close Valve 1, Valve 3, and Valve 5. Count the number of turns.
  - Confirm Valve 2 is closed
  - Bleed down the pipeline from both ends
  - Remove Flange A and install flushing flange
  - Notify the platform that the pipeline is ready to be flushed
- Flush the pipeline with seawater from the SSTI back to the platform until it is cleared of hydrocarbons by confirmation of a clean static sheen test. An in-line flow meter will be used to confirm the volume of water pumped.
- 5. Bleed down the pipeline to 0.0 psig. Blind flanges, with bleed plugs, will be installed to production piping at each end of pipeline.
- A 3 to 4 ft section of the riser above the water line will be removed at EC 172 A and a plumber's plug installed at the top the each riser. Saws will be utilized to make the required cuts. Note: pipe shall not be "torch cut".
- 7. Divers at WC 153 16-in SSTI will:
  - Close Valve 6
  - Disconnect the pipeline at Flange B and Flange C
  - Retrieve the section to the surface.
  - Install 6" ANSI 900 RTJ flange (w/ 1-in tap s/s ball valve and plug) on Flange A.
  - Install a plumber's plug in the end of the pipeline being left in-place and bury the end to 3' of cover and place a pallet of sand/cement bags place on top.
  - Replace cover over the <u>SSTI</u> to the condition that it was in before it was uncovered. 2 extra
    pallets of pure sand bags will be onboard in case the original bags are not enough to re-cover
    the assembly to at least 3-ft.
- 8. Divers will relocate to WC 130 B:
  - Jet out the pipeline approximately 20' from the base of the riser and "cold cut" the pipe at that point. A pollution dome will be set above each cut point.
  - Divers will then "cold cut" the riser above the tube-turn and retrieve the tube-turn and section
    of pipe to surface.
  - A plumber's plug will then be installed in the cut end of the pipeline and the end buried to 3' of cover and a pallet of sand/cement bags place on top.
- 9. Demobilize DSV.





February 1, 2017

eni us operating eni us operating co. inc. 1200 Smith Street, Suite 1700 Houston, TX 77002 Tel. 713-393-6100 Fax 713-393-6205

Regional Supervisor Bureau of Safety and Environmental Enforcement (BSEE) Pipelines Section 1201 Elmwood Park Blvd. New Orleans, Louisiana 70123-2394

Attention: Ms. Angie Gobert

FEB 0 3 2017 Office of Field Operations Pupeline Section

Bureau of Safety and Environmental Enforcement (BSEE)

RECEIVED

Re: Relinquishment and Proposed Abandonment In-Place of Right-of-Way Pipeline – 6" GAS (Segment No. 18228, ROW G29065), Originating at West Cameron Block 130, Platform B and Terminating at West Cameron Block 153, 16-inch SSTI, OCS Federal Waters, Offshore, Louisiana

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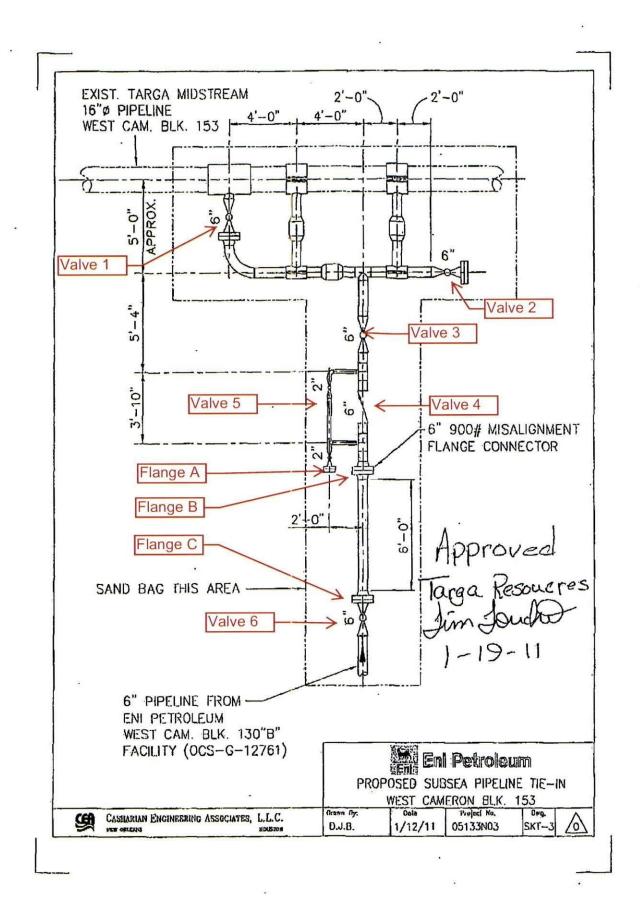
General Information	
BOEMRE Segment No.:	
Pipeline Description:	
MAOP:	
Total Pipeline Length:	
Pipeline Capacity:	

#### Abandonment Procedure

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18228 6" Gas 1300 31,317' 1,095 bbls

- 2. The receiving crew at the WC 130 B Platform will isolate the pipeline from the production system. They will then insure that discharge from the pipeline is "lined up" to the equipment to be used to handle displaced fluids from the pipeline being abandoned. All hydrocarbons will be captured for proper disposal while water will be tested and processed as needed before being discharged overboard.
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- 7. Divers at WC 153 16-in SSTI will:
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- 9. Demobilize DSV.



#### Lease Term and ROW Pipeline Decommissioning Engineering Analysis

		18778 519065
Segment N	No	10LL0 Right-of-Way: No. 021-00
Lease/RO Identified ( Technical	Oper	ator (RQW Only): // Company Code: //
	Pipe	Lease Term (LT) Pipeline?
1	ii)	Application Fee of \$1,142.00 Right of Way (ROW) pipeline Application Fee of \$2,170.00 Relinquishment (Complete)
	iii)	(If partial relinquishment, application may be a ROW modification) Procedures for Decommissioning (In-Place/Removal/Both) are present
1	In-P	Place:
		Is Pipeline being pigged as per 30 CFR 250.1751(b)? Yes No, Is a departure/waiver requested? No, Is a departure/waiver requested? Yes No, Is a departure/waiver requested? Yes Yes Yes Yes Yes Yes Yes Yes
	v)	Is pipeline being flushed and filled with seawater per 30 CFR 250.1751(c) & (d) Yes No, Is a departure/waiver requested and explanation?
	vi) vii)	Is pipeline being cut and plugged at each end of the pipeline? Is each end of the pipeline being buried 3 feet below the seafloor or cover each end with protective concrete mats for water depths up to 500 ft?
	viii)	Are all pipeline valves and fittings (that could unduly interfere with other uses of the (OCS)) being removed?
	Don	noval:
		Is Pipeline being pigged as per 30 CFR 250.1752(b)
	6	Yes
		No, Is a departure/waiver requested and pipeline being flushed and filled until no presence of hydrocarbons?
	x)	Is pipeline being flushed and filled with seawater per 30 CFR 250.17851(c)
		Yes No, Is a departure/waiver requested and explanation?
NOTE IN		
	xii)	Lengths of pipe to be removed and to be decommissioned In-Place.          Removal       In-Place
В.	Dat	a Entry and Administrative Tasks:
		Contact for decommissioning application Lin
		through the Contacts tab and select the mail contact for the application shown as "Application - Mail Contact" under Contact Type
		and select by highlighting. Click the blue arrow under Contact Information and proceed to query on the particular company's name searching for the contact that has submitted and signed the report. Ensure that the correct address accompanies the contact and then
		select. If the contact name is not shown or the address that accompanies the contact is incorrect, confirm with company contact
	ii)	From Pipeline Tracking click on Navigate Button or ALT: N and click Paygov Transactions. From Paygov Transaction screen input

- the transaction ID number with the associated Segment Number into the Paygov Trans ID window, or press blue down arrow to search.
- iii) From Pipeline Tracking click on application "Sub Type" button and check the type that applies. (In-Place, In-Place/Removal, or Removal)
- iv) From the Permit Tracking Form, click on the Initial Pipeline Submittal field "Letter Date". Then click on the "Modify/Add Review" tab located in the bottom left corner of the form. On next screen, click on the "Add a Review" tab and select the "Pipeline Engineers Review" and If ROW Relinquishment then generate Adjudication Review select "Adjudication Review. Make sure you have the correct submittal type shown at the top of the Generate, Add, Modify Pipeline Reviews screen. Click on "OK" then press F10 to save or use the disk icon on the tool bar. Close the window. On the Pipeline Tracking Form within the "Application Review Coordination" section, locate the "Adjudication Review" review and click on the "Letter" tab. Print the letter, sign it for the engineer, attach copy of cover letter, and forward it to the Adjudication Section Mail Stop (MS) 5421.

- v) For all types (LT/ROW), update the Pipeline Masters Page. From the Permit Tracking Form, click on the Pipeline Masters button.
  - 1. Update the Pipeline Status to PABN (Proposed Abandonment In-place or both) or PREM (Proposed Removal)
  - 2. Update Abandonment Type to either In-place / removal, or both.
  - 3. \_\_\_\_ Out of Service (OOS) Date?
    - a. If not present, click on "History" Tab and input date of pipeline then appropriate code for OOS (O) and type a brief statement of when pipeline was OOS and when MMS was notified of date.
    - b. If company is Out of Compliance for notification of OOS issue 1 office Incident of Non-Compliance (INC) referencing a Potential Incident of Non-Compliance L-821 and Enforcement Action of Warning (W) and Authority being 30 CFR 250.1008(c). See INC form in G:\FO\PIPELINE\LETTERS\INC.INC.DOC
  - 4. If Flush and Fill (FF) Date per 30 CFR 250.1006(b)(2)?
    - a. If not present, click on "History" Tab and input date of pipeline then appropriate code for FF (U) and type a brief statement of when pipeline was FF and when MMS was notified of date.
    - b. If company is Out of Compliance for not Flushing and Filling (pickling) after a pipeline is OOS for 1 year as per 30 CFR 250.1006(b)(2) issue 1 office INC referencing a PINC G-803 and Enforcement Action of Warning (W) and Authority being 30 CFR 250.1006(b)(2). See INC form in G:\FO\PIPELINE\LETTERS\INC.INC.DOC
  - 5. If Right-of-Way, click on ROW Info button to edit the status of the ROW:
    - a. If company is In-compliance with OOS requirement and/or temporary cessation has not expired, change status code from "Active" to "Relinquished" and input date Received and date of letter in the "Relinquished Date"
    - b. If ROW has expired due to non-notification or temporary cessation expired change status code from "Active" to "Expired".

#### C. Approval Letter Preparation:

- 1. \_\_\_\_ All issues are resolved.
- 2. \_\_\_\_ Verify that the Adjudication Review has been completed and accepted by Adjudication Section (If ROW)
- 3. \_\_\_\_\_From the Permit Tracking Form, click the Application Letter button at the bottom of the Permit Tracking Form and send the letter to the G drive by selecting "file" from the drop down menu under "Destination Type" and then clicking the "green light". Then, go to G:\FO\PIPELINE\LETTERS. This folder lists letters alphabetically by company and in segment number order under each company. The completion letter for a particular company and segment number. Either (1) print the letter and make handwritten changes, or (2) make the changes electronically and save in the RICH TEXT FORMAT and print. Note: If departure is approved/not approved add departure statement, If ROW expired add expiration paragraph.
- 4. \_\_\_\_Attach the draft to the original application and include a copy (for scanning) if it is an ROW pipeline. Check the bcc list. Application and amendments are organized in chronological order with the most recent first. Do not include fee payment or similar information in the scanning copy of application
- 5. \_\_\_\_ Ensure that all of the information contained on the letter is as it should be.
- 6. \_\_\_\_Bring the letter and attachments to the Out Box for Typing and input to typing date in Pipeline Tracking Screen.
- 7. \_\_\_\_After proofing the letter and when all is accurate, surname it and bring to Engineer or supervisor final review and signature.

