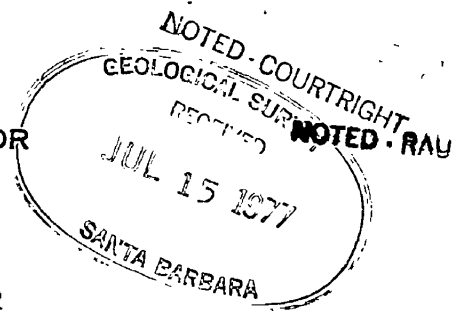




UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY
7211 FEDERAL BUILDING
300 NO. LOS ANGELES STREET
LOS ANGELES, CALIFORNIA 90012



NOTED = L.L.D.

July 14, 1977

Chevron U.S.A. Inc.
P. O. Box 446
La Habra, CA 90631

Noted — Bray

Attention: Mr. J. R. Shore

Re: Santa Clara Unit, Plan of
Development

Gentlemen:

Your plan of development for the Santa Clara Unit in the Santa Barbara Channel submitted January 7, 1977 and consisting of proposals to construct and install a combination drilling and production platform on lease OCS-P 0217 and to drill approximately 36 wells from the platform is hereby approved. Later phases of the development plan, including the installation of pipelines to handle produced fluids from the platform are approved in concept, with site specific assessment to be made as more details are received and a specific route is selected. Each phase of the proposed development will require review and approval of the Area Oil and Gas Supervisor (hereinafter referred to as the Supervisor) and will be subject to, but not limited to, the following stipulations:

1. Adherence to the requirements contained in the Federal regulations for the Outer Continental Shelf and in pertinent OCS Orders, both present and future, issued by the Oil and Gas Supervisor, Pacific Area.
2. A description of each planned phase of the operation for the service life of the project; this shall include provisions for abandonment and removal and a statement as to the conflict with commercial fishing operations and recreational activities in the area during the life of the project.
3. All phases of the proposed installation shall be certified by a registered professional engineer, mechanical, electrical, or structural, as appropriate.
4. Prior to the commencement of construction and installation a tentative progress schedule shall be submitted to the Supervisor. This schedule shall be updated, as appropriate, during the course of construction and installation.



5. During construction and installation, the Supervisor, or his authorized representative shall have access to the site or sites of activity.
6. Periodic progress reports shall be submitted to the Supervisor, at intervals of approximately one month, or as particular phases are completed or substantial progress made.
7. The Supervisor shall be notified upon the completion of each phase of the project and upon final completion. As-built drawings shall be furnished to the District Engineer and the Supervisor for each installation completed.
8. Submittal to, and approval by, the Supervisor of the following, in regard to construction and installation of the platform:
 - a. Final design of the structure including static and dynamic stress analyses to indicate acceptability with the seismicity and geotechnical characteristics at the site as well as wind, wave, and current forces in the area.
 - b. Detailed description of lifting and installation methods and procedures.
 - c. Drilling and production equipment installation.
 - 1) Plan view of each platform deck outlining any non-hazardous area/areas which are unclassified with respect to electrical equipment installations, and areas in which potential ignition sources are to be installed. Plan views shall include any surrounding production or other hydrocarbon source. Also, a description of deck, overhead, and firewall shall be included.
 - 2) A flow schematic showing size, capacity, and design working pressure of separators, treaters, storage tanks, compressors, pumps, metering devices, valves, and similar equipment including a reference to welding specifications or codes used.
 - 3) Flow schematics of pollution and safety controls identified according to nomenclature (definition, symbols, and identification) contained in API-RP 14C shall be accompanied by an explanation as to functions and sequence of operation.
 - a) Pollution control systems.
 - (1) High and low shutoffs and alarms for level, pressure and temperature.

- (2) Manual control shutoff stations and systems.
 - (3) Water disposal (produced and sanitary) cleanup systems.
 - (4) Platform drainage and sump systems.
 - (5) Solids disposal - drill cutting and drilling mud, sewage, garbage, etc.
- b) Safety control systems.
- (1) Combustible gas and H₂S alarm and shutoff systems.
 - Enclosed area pressurized systems and ventilation systems.
 - A diagram specifying the type, location and number of detection or sampling heads.
 - Cycling, non-cycling, and frequency information.
 - Type and kind of alarm, including emergency equipment to be activated.
 - (2) Fire control systems.
 - Heat and flame detection, alarm and shutoff systems.
 - Deluge and water line systems.
 - Chemical systems.
 - Fusible plug systems.
 - A diagram of the fire-fighting system showing the location of all equipment.
- c) Personnel protection.
- (1) Living quarters.
 - (2) Control stations.
 - (3) Boat landings and helicopter decks.
 - (4) Egress routes.

- 4) Diagrams of the electrical system to include the following:
 - a) Locations of generators/alternators, or other source; panel boards; major cabling/conduit routes and identification of wiring method.
 - b) Type, rating, and operating and safety controls of generators/alternators and prime movers.
 - c) Main and satellite switchboards including interlocks, controls, and indicators.
 - d) Feeder and branch circuits, including circuit load, wire type and size, motor protection, and circuit breaker setting.
 - e) Calculation or measurement of electrical system voltage drop caused by starting current of largest motor while normal load-operating conditions exist.
 - f) Elementary electrical schematic of any platform safety/alarm/shutdown system with functional legend.
9. Submittal to, and approval by, the Supervisor in regard to construction and installation of pipelines.
 - a. General information concerning the pipeline including the following:
 - 1) Geologic and seismic review of route, ocean bottom and current survey with water depths.
 - 2) Product or products to be transported by the pipeline, with anticipated volumes, working pressures, and gravity or density of product.
 - 3) Length of line, size, weight and grade of pipe; maximum working pressure and capacity of line.
 - 4) Installation procedure with bulk specific gravity of the line (line empty).
 - 5) Description of protective coating and type or types of corrosion protection.
 - 6) Type, size, pressure rating, and location of pumps and prime movers, and similar information for any intermediate stations.
 - b. Drawing(s) showing the major features and other pertinent data including:

- 1) Route.
 - 2) Location.
 - 3) Water depth.
 - 4) Length.
 - 5) Connecting facilities.
 - 6) Size.
 - 7) Burial depth, if buried.
- c. A schematic drawing showing the location and function of pipeline safety equipment:
- 1) High-low pressure sensors and alarms.
 - 2) Automatic shut-in valves.
 - 3) Check valves.
 - 4) Vessels and traps.
 - 5) Manifolds.
 - 6) Volumetric metering system.
 - 7) Corrosion monitoring and protection equipment.
10. Prior to commencing operations emergency operating procedures and contingency plans shall be submitted to the Supervisor for approval:
- a. Oil spill: containment and cleanup procedures.
 - b. H₂S.
 - c. Critical operations.
 - 1) Simultaneous operations.
 - a) Narrative description.
 - b) Schematic plans showing areas of activities.
 - c) Identification of critical areas of simultaneous activities.

d) Procedures for mitigation of potential undesirable events including:

- (1) Guidelines the operator will follow to assure coordination and control of simultaneous activities.
- (2) Indication as to the person having overall responsibility, as person in charge at the site, for safety of platform operations.
- (3) An outline of any additional safety measures required for simultaneous operations.
- (4) Specifications of any added or procedural conditions imposed when simultaneous activity is in progress.

2) A welding and burning safe-practices plan similar to the above.

11. Prior to commencing operations, a communications plan and personnel and material transportation plans including any provisions for standby boats during hazardous operations shall be submitted to the Supervisor for approval. These will primarily be the responsibility of the District Engineer and shall be reviewed periodically with the District Engineer.
12. Prior to commencement of drilling, generalized drilling and completion programs shall be submitted for approval by the Supervisor. At the same time, or as soon as sufficient information is obtained, detailed completion practices shall be submitted for approval to the Supervisor. The provisions of OCS Order No. 11 shall be followed in this regard. This is not to be interpreted as nullifying the requirement to obtain an approved application to drill from the District Engineer prior to commencing drilling operations, nor to obtain subsequent permits (supplementary notices, etc.) prior to program changes, completions, etc.
13. Plans and procedures for inspections, training and drills shall be submitted to the Supervisor for approval. These will primarily be the responsibility of the District Engineer and shall be reviewed periodically with the District Engineer. These plans and procedures should cover all normal activities and emergency procedures, concerned with any and all installations mentioned above, and any events that might be expected to occur on the proposed installation. They shall include methods and frequency of testing, calibration, drills, and training as well as organizational or personnel responsibility that insures that plans and procedures are carried out.

All of the above stipulations are intended as a guide to insure prompt approval for each phase of your development program. The Supervisor reserves the right to request any further information he may require. The manner in which you submit the above information may make it possible to include several requirements on the same submittal. Duplicate submittals of the same material will not be necessary and may be included by reference.

The oil spill and H₂S contingency plans previously submitted in conjunction with your plan of development for the Santa Clara Unit have also been reviewed and are hereby approved.

Sincerely yours,

(Orig. Sgd.) H. T. CYPHER

H. T. Cypher
Acting Oil and Gas Supervisor
Pacific Area

cc: Conservation Manager, Western Region
District Geologist, Los Angeles
District Engineer, Santa Barbara ~~copy~~ This Copy for



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VIRGINIA 22092

~~Adams~~
~~Schambach~~
~~KREPPERT~~
File

In Reply Refer To:
EGS-Mail Stop 620

NOTED - CYPHER

JUN 28 1977 JUL 12 1977



Memorandum

To: Acting Conservation Manager - Western Region
From: Acting Chief, Conservation Division
Subject: Environmental Analysis (EA) and Plan of Development,
Santa Clara Unit, Santa Barbara Channel

NOTED - ADAMS

File

We have reviewed the Santa Clara Unit EA and Plan of Development transmitted with your memorandum of May 16 and concur with the determination of the Pacific Area Supervisor that the proposal does not constitute a major Federal action as defined in the National Environmental Policy Act.

Enclosed are specific comments on the EA. You are advised to make the appropriate modifications in the EA and to authorize the Supervisor to proceed with the appropriate action on the Plan of Development.

Because the Santa Clara Unit leases were issued prior to the revision of 30 CFR 250.34 and because California does not yet have an approved Coastal Zone Management Plan, no consultation with the State is required. Similarly, the September 29, 1976, agreement between Secretary Kleppe and the city and county of Santa Barbara exempts the Santa Clara Unit from the notification requirements of paragraph 4. However, with regard to future developmental plans for the Santa Barbara Channel, we believe our interests would be best served by consulting the State and local jurisdiction during the EA process.

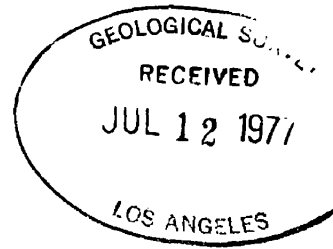
Acting Chief, Conservation Division

Enclosure



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VIRGINIA 22092



In Reply Refer To:
Mail Stop 600

June 21, 1977

Memorandum

To: Branch of Marine Oil and Gas Operations

Through: Acting Associate Chief, Conservation Division *HA Gidley*

From: Environmental Section

Subject: Review of the EA for the Santa Clara Unit Plan of Development

We have reviewed the subject EA and our comments are enclosed.

We concur with the determination of the EA that the subject action does not constitute a major Federal action significantly affecting the quality of the human environment in the sense of NEPA, Section 102 (2)(C). However, Environmental Section approval of the EA is contingent upon the conditions discussed herein.

In the future, all proposed exploration and development plans should be closely coordinated with the State. State review comments should be appended to future EA's. The California Coastal Zone Management Program is expected to be approved by the Department of Commerce early this fall. When this occurs then all OCS exploration, development, and production plans will have to be consistent with the State Program in accordance with the Coastal Zone Management Act as amended, Section 307 (c) (3) (B).

Should make aware of this

In view of the history of the Santa Barbara area and the policy involvement of the Director's Office in FES-75-13, Mr. Herb Stewart should be aware of Conservation Division action in this matter. Additionally, any correspondence to the Region concerning the headquarters concurrence with the EA determination must be surnamed by the Environmental Section.

The present EA should be returned to the Environmental Section for filing. The following comments should be incorporated as changes to the existing EA, prior to final approval or as stipulations to approval. When these changes are made, the ES must receive a copy of the modified EA with the changes so noted.

Herb Stewart
Environmental Section



Enclosure

Santa Clara Unit Plan of Development Comments - Environmental Analysis (EA)

1. The EA basically concerns the first stage of the development plan. Later stages of the development plan (not yet formulated) will be analyzed when submitted for approval and the analysis will be appended to this EA.
2. A short one-paragraph discussion of sour gas and its hazards and safety measures should be added to the EA.
3. A brief description of modern drilling techniques and a reference back to this discussion in the FES should follow paragraph 6 on page 7.
4. On page 7, paragraph 8, the text should read ...will be protected from salt water intrusion.
5. A short description concerning endangered species should be added to the EA in Section G and referenced back to the FES.
6. It should be clarified that the Impact discussion covers only the first phase of the development plan. (Page 12, Part III, paragraph 1)
7. The discussion of Federal agency comments is inadequate. In addition to the identification of each agency and its concern in the EA, copies of the correspondence should be appended to the EA.
8. On page 13c the Endangered Species clearance for the action should be stated and referenced to the appropriate authorities (FWS and NMFS).
9. The discussion of impacts from Oil Spills should be referenced back to the FES for further information.
10. Second page of the enclosed BLM memo is missing from the appendix.
11. Section IX of the plan, Offshore Loading and Storage System, most likely will be controversial with the State. Current lawsuits should be noted and discussed in the EA.
12. A discussion of the agreement made between DOI and the onshore governmental units (City and County of Santa Barbara) would be in order in the EA.
13. We agree with the Western Region comments of May 16, 1977.