CALIFORNIA COASTAL COMMISSION 631 Howard Street, San Francisco 94105 — (415) 543-8555

April 14, 1980

Change to CC-4-80: Chevron Plan of Exploration for OCS P-0316

P. 3 Omit last two paragraphs and ADD:

The equipment specified by Chevron in the Plan of Exploration cannot assure protection of marine resources under Section 30230 nor can it provide effective containment and cleanup as required by Section 30232. Under adverse weather conditions such as high wind and waves, oil spill equipment is not effective in containing oil spills. Section 30260 states that oil and gas development may nonetheless be permitted even when not consistent with other Coastal Act policies if, among other things, adverse environmental effects are mitigated to the maximum extent feasible. The state-of-the-art in oil spill control technology is a factor to be considered in reaching a feasibility determination.

The Commission finds that the oil spill containment and cleanup equipment as provided in Chevron's Plan of Exploration and this consistency determination provides maximum feasible mitigation at this time and therefore concurs with Chevron's consistency certification.

Concurrence by the Commission, however, is not an indication of satisfaction with the degree of protection afforded coastal resources by the oil spill containment and cleanup equipment referenced in Chevron's Plan of Exploration. Therefore, the Commission plans to conduct studies of existing oil spill equipment and cleanup capabilities along the California coast. Such studies may indicate the need to upgrade and increase standards for both onsite and onshore oil spill cleanup and containment capabilities. Such findings will be used in consistency determinations in the future.

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CONSISTENCY CERTIFICATION SUMMARY AND STAFF RECOMMENDATION

METED - ADVANCE

NOTED - DUNAWAY

APPLICANT FOR FEDERAL PERMITS:

FEDERAL PERMITS FOR WHICH COMMISSION CONCURRENCE WITH APPLICANT'S CONSISTENCY CERTIFICATION IS REQUIRED:

FEDERAL PERMIT ACTIVITY LOCATION:

FEDERAL PERMIT ACTIVITY DESCRIPTION:

PUBLIC HEARING AND VOTE:

Consistency Certification No. CC-4-80 (Chevron USA)

3 Month Period Ends: May 11, 1980 6 Month Period Ends: August 11, 1980

Chevron USA, Inc.

U.S. Geological Survey Exploratory Well Drilling Permits; OCS Exploration Plan; U.S. Army Corps of Engineers Permit to Drill an Exploratory Well.

On the Outer Continental Shelf on OCS Parcel 0316 located approximately 10 nautical miles west of Pt. Conception, in the Santa Barbara Channel. (Exhibits 1 & 2)

Drilling three wells on OCS lease parcel 0316 to explore for oil and gas from an anchored drillship, the Glomar Grand Isle.

Public hearing and possible action scheduled for the Commission's April 15 - 17 meeting in Los Angeles.

SUBSTANTIVE FILE DOCUMENTS:

1. Environmental Report (Exploration) for proposed exploratory wells P-0316-1, -2, and -3, Santa Barbara Channel, Chevron U.S.A.

2. Chevron Exploration Plan for Wells P-0316-1,-2, and -3, Santa Barbara Channel, Chevron U.S.A. operator.

3. Application for U.S. Army Corps of Engineers Permit to Drill an Exploratory Well.

STAFF NOTE: CONSISTENCY

Under regulations which implement the Federal Coastal Zone Management Act, the United States Geological Survey, the Environmental Protection Agency, and the Corps of Engineers cannot grant a permit for any activity described in an Outer Continental Shelf (OCS) Plan of Exploration until the Coastal Commission concurs with a certification by the oil company applicant that the activity is consistent with the California Coastal Management Program (CMP) or determines that the activity has no effect on the coastal zone.

1. Project Description. Chevron U.S.A. Inc. proposes to drill up to three exploratory wells in the Santa Barbara Channel, about 10 miles west of Point Conception (Exhibits 1,2). The proposed wells will be located in federal OCS Lease Parcel 0316. Location #1 is the intial exploratory well on the lease; location #3 is a delineation well which will be drilled depending on results from Well #1; and location #2 is a test of a separate geologic structure, which also depends upon results of the first well.

Drilling time for each well will be 60 - 90 days, including testing and abandonment procedures. Water depth at the three locations is between 344 and 640 feet.

OCS P-0316 is a lease obtained by Chevron in Lease Sale 48. There have been no previous wells drilled on this tract but Chevron plans to drill at least six wells on it, including these proposed wells.

2. Applicant's Consistency Certification and Findings. Chevron has submitted the following consistency certification:

"The proposed activities comply with the State of California's Coastal Management Program and will be conducted in a manner consistent with such program."

"The only policy of the CCMP which might relate to the proposed activity is contained in Section 30232. No other policy of the CCMP is applicable to the proposed permitted activity and therefore this statement in Support of Corsistency Certification addresses only Section 30232 which provides as follows:

Section 30232, Protection Against Spillage

Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur."

"Chevron's Exploratory Plan protects against the spillage of crude oil, gas, petroleum products and hazardous substances and provides effective containment and cleanup facilities and procedures for any accidental spills which might occur in compliance with Pacific Region OCS Order No. 7 of the U.S. Geological Survey. The provisions covering this matter are set forth in detail in Chevron's Oil Spill and Emergency Contingency Plan as previously submitted for OCS P-0215-2."

"The impact of drilling exploratory wells in Outer Continental Shelf, as analyzed in the accompanying Environmental Report, is negligible in magnitude and temporary in nature. Such temporary operations will not significantly affect any land or water use in the coastal zone of the State of California, and are therefore consistent with the Coastal Zone Management Act as implemented in 15 CFR 930."

STAFF RECOMMENDATION

The staff recommends that the Commission adopt the following resolution:

I. Concurrence

The Commission hereby concurs with the consistency certification made by Chevron USA

because Chevron's Plan of Exploration is consistent with the policies and objectives of the California Coastal Management Program.

II. Findings and Declarations

The Commission finds and declares as follows:

A. Protection Against Spillage of Crude Oil. Regardless of the precautions taken against well blowouts and resulting spills of crude oil in the open ocean, there is always a risk of this occurring at a drill site. Such a spill may reach the coast of California and damage marine life, scenic areas, and recreational uses of the coast. Because of this risk, the proposed drilling operations must be consistent with Section 30232 of the Coastal Act, incorporated in Chapter 3 of the Coastal Management Program, which states:

Protection against the spillage of crude oil, gas, petroleum products or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

The history of offshore exploration shows that an oil spill blowout during oil and gas exploration is a low probability event. Chevron has included the oil spill measures which the Coastal Commission has found to be adequate in previous Plan of Exploration Consistency determinations for U.S. Geological Survey Permits to Drill. These measures include additional onsite oil spill containment and cleanup equipment, access to oil spill contractors or cooperatives for large spills, Chevron's oil spill contingency plan, and the added protection provided by the State and Federal oil spill contingency plans.

The Commission has developed specific standards for onsite oil spill equipment in previous consistency determinations for Plans of Exploration in the Outer Continental Shelf. These standards are the product of consultation with the Department of Fish and Game, oil spill research organizations, and oil spill contractors with direct experience in the field of oil spill containment and cleanup. The following list includes the onsite equipment that the Commission has established as a minimum. This equipment exceeds the equipment previously approved by the U.S. Geological Survey for exploratory drilling plans:

- 1) 1500 feet of open ocean oil spill containment boom;
- 2) an oil skimming or recovery device capable of open ocean use;
- 3) oil sorbent material capable of containing 15 barrels of oil;
- 4) a boat capable of deploying this equipment onsite or within 15 minutes of the drillsite.

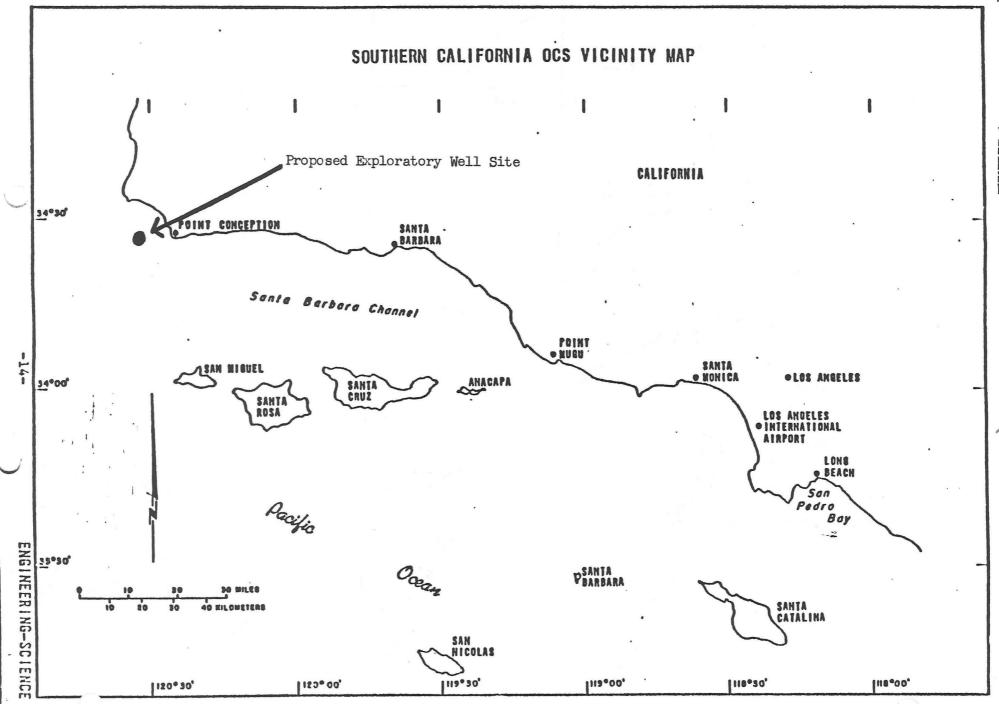
The Commission considers the oil spill measures contained in this Plan of Exploration to be consistent with Section 30232 of the Coastal Management Program. The onsite equipment is listed in Exhibit 3.

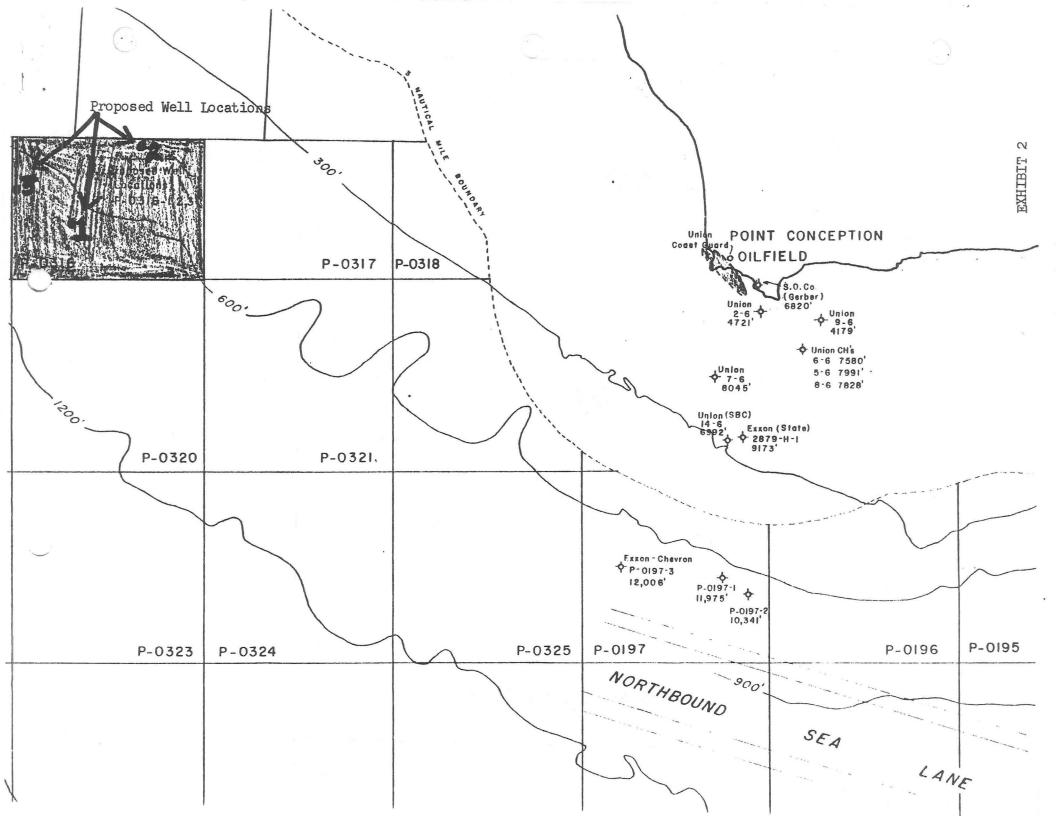
Concurrence by the Commission is not an indication of satisfaction with the degree of protection afforded coastal resources by the state-of-the-art oil spill containment and cleanup technology. Equipment specified in the consistency determination

does not assure protection of marine resources under Section 30232 of the Coastal Act but affords an immediate response to a spill at the drill site. Under adverse weather conditions of high wind and waves, no oil spill equipment can contain a spill. Section 30260 states that oil and gas development can nonetheless be permitted if adverse environmental effects are mitigated to the maximum extent feasible; the state-of-the-art in oil spill control technology determines this extent. The Commission therefore finds that the oil spill containment and cleanup equipment provided in Chevron's Plan of Exploration is feasible under Section 30260. However, the Commission plans to conduct studies of the state-of-the-art of oil spill equipment. This may result in the need to increase onsite and onshore equipment standards.

B. <u>Navigation</u>. To anchor a drillship in navigable waters, a permit must be obtained from the U.S. Army Corps of Engineers. The Corps permit activity is on the list of activities in the CMP that may affect the coastal zone, therefore the Corps cannot grant such a permit without Commission consistency concurrence. The Corps reviews the impacts on navigational safety of placing any structure in navigable waters.

The Commission considers oil exploration or development within the vessel traffic lanes or within 500 meters of them to be inconsistent with the policies and objectives of the California Coastal Management Program. Specific findings to this effect have been included in consistency determinations before the Commission for previous Plans of Exploration. All of the proposed well sites in this Plan of Exploration are located outside of the vessel Traffic lanes and the 500 meter buffer (Exhibit 2).





CHEVRON U.S.A. INC.

Oil Spill Equipment and Materials Inventory

- Model 1011-OS Floating oil skimmer with 1-1/2 HP 115/230-volt Class 1 Group D explosion-proof GE motor
- Homelite Generator #176A 35-1 3,500 watts w/spark arrester
- 1,500 Feet, #3-12.24 Floating Barrier* as manufactured by Oil Spill Services w/12" fence and 23" skirt and 3/8" chain
 - 6 Bales, Conwed Sorbent Booms (240 feet)
 - 2 Bales, Conwed Sorbent Continuous Sweeps
 - Boxes, Conwed Sorbent Regular Sweeps
 - 4 Hudson Ozark Sprayers
 - 10 Drums, Corexit Dispersant (Concentrated)
 - 3 Drums, Shell, "Herder"

*[Note: A boat to deploy the Floating Barrier (i.e., containment boom) will be continuously available, and within 15 minutes of the drill site.]

EXHIBIT 3