Unocal Corporation
Unocal Oil & Gas Division
Attention: Bill L. McFarland
P. O. Box 6176
Ventura, CA 93006

Re: Santa Clara Unit, OCS-P 0216, Update to Development and Production Plan

Gentlemen:

On December 12, 1985 Union submitted an update to the Development and Production Plan (DPP) for Platform Gilda. This update includes discussion of Monterey Formation development beyond that included in the initial DPP, as well as additional information on development of the Pico and Repetto. We have considered several aspects of this update, as discussed below.

Verification of Platform Changes. Union's proposal for a permanent H₂S sweetening system includes the addition of a cantilevered deck section to the production deck. In our letter of March 18, 1986, we approved the selection of PNB Systems Engineering, Inc. as Certified Verification Agents for design, fabrication, and installation of the deck modifications. This verification process requires the submittal of design, fabrication, and installation plans and reports for review and approval by the MMS.

Reservoir Development. We have evaluated the development scenario presented in the DPP update and we believe it to demonstrate prudent and diligent development. Both the original DPP and the update note Union's intention to evaluate benefits of gas injection. We request that this evaluation be continued, and that the secondary benefit of re-injection, the reduction of upset flaring, be considered.

Air Quality. On June 18, 1986 we received in this office air emissions data for the permanent H₂S removal facility. These data show an estimated 61.7 tons per year of SO₂ emissions based on throughput of 20 MMSCFD. Based upon existing distance-based formulas specified in regulations governing air emissions (30 CFR 250.57), the estimated emissions from this proposal are acceptable.

Based upon the analyses discussed above, the Platform Gilda DPP update is hereby approved. This approval is contingent upon acceptable completion of the following:

- 1. Submittal of design, fabrication, and installation plans and reports for the cantilevered deck section.
- Continued submittal of annual plan of operations, including consideration of gas re-injection.
- Continued submittal and analysis of quarterly emission inventory reports and monthly flaring reports. If these reports show either emission or flaring volumes to be excessive, MMS will take necessary action to resolve the problem.

If there are any questions regarding this letter, please call Ms. Susan Lee at (213) 894-6719.

Sincerely,

(Orig. Sgd.) James R. Mason, Jr.

Thomas W. Dunaway Regional Supervisor Office of Field Operations

bcc: FILE: Santa Clara Unit, OCS-P 0216 (Platform Gilda) DPP Corres.

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Unocal Oil & Gas Divis
Unocal Corporation
2151 Alessandro Drive, P.O. Box 6176
Ventura, California 93006
Telephone (805) 656-7600



NOTED - CUTTON

Noted - Dunaway

December 12, 1985

Bill L. McFarland District Engineer Southern California District

> Mr. Thomas W. Dunaway Regional Supervisor Minerals Management Service Pacific OCS Region 1340 West Sixth Street Los Angeles, CA 90017



Santa Clara Unit, OCS P-0216

Dear Mr. Dunaway:

Attached are the three confidential copies you requested of an update to the Plan of Development for Santa Clara Unit, OCS P-0216, Platform Gilda, Santa Barbara Channel, California Offshore.

An additional confidential copy has been delivered to Mr. James W. Wright, District Supervisor, Ventura, California.

We consider these to be confidential documents. We expect that particularly the geological and reserve data will be held confidential by the M.M.S. Please let me know if we can be of further assistance.

Very truly yours,

BLM:dlp Attachments

cc: Mr. James W. Wright



United States Department of the Interior

MINERALS MANAGEMENT SERVICE PACIFIC OCS REGION, VENTURA DISTRICT

145 NORTH BRENT STREET SUITE 202 VENTURA, CALIFORNIA 93003 Noted - Dunaway

In Reply Refer To: MMS-Mail Stop March 25, 1986

Memorandum

To:

Regional Supervisor, Office of Field Operation, Pacific OCS Region

From:

District Supervisor, Ventura District

Subject:

Santa Clara Unit OCS-P 0216 Platform Gilda, Plan of Development

The Ventura District Office has reviewed the subject Plan of Development submitted by Uniocal on December 12, 1985.

We have no comments to offer on the Plan of Development as presented. It was also noted that there were no significant departures to the Plan of Development presented during the annual review of operations for Platform Gilda held in the Minerals Management Service Los Angeles office on March 18, 1986.

James W. Wright

bcc: Union OCS-P 0216 General Correspondence

Union OCS-P 0216 Plan of Development

Platform Gilda File R.O. Courtright J. W. Wright

Chron

ROCourtright/jh

MINERALS MEMBERS PACIFIC

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