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TU-11A



File No.: CC(E)-65-91 and
 E-91-03
 Date Filed: CC(E): 9-27-91,
 E: 11-25-91
 49th Day: 1-6-92
 3-month period ends: 12-27-91
 6-month period ends: 3-27-91
 Staff: RTB (SF)

REGULAR CALENDAR

Staff Recommendation on Permit and Consistency Certification
For UNOCAL Platform Gina

Applicant: UNOCAL North American, Oil and Gas Division

Project Title: Platform Gina: Development and Production Plan Revision

Project Description/ Pipeline (Located in State Waters) (Coastal Development Permit required) a) Repair and replace 2,300 feet of water return pipeline from MHTL seaward toward Platform Gina; b) Convert water return pipeline to gas sales service (permit required for that portion in State waters and land).

Modifications at Platform Gina (Located in OCS) (Consistency Certification Required): a) Convert water return pipeline to gas sales service (for portion in OCS); b) Drill a maximum of seven additional gas wells; c) Install temporary gas sweetening facilities; and d) Expand deck and install permanent gas sweetening facilities as development reaches full production.

Project Location: Platform Gina is located six miles southwest of Oxnard, California within OCS-P 0202 in Federal waters, in 95 feet of water. The two pipelines extend through state waters, coming onshore at Mandalay facility in the City of Oxnard. See Exhibit 1.

Substantive File Documents: See Appendix A

STAFF NOTE

The portion of the project covering the replacement and conversion of the pipeline section in state waters or lands constitutes development in the coastal zone, and thus requires a coastal development permit. Therefore, the Commission must review this pipeline portion of the project for conformity with the policy provisions of Chapter 3 of the Coastal Act.

The remaining portion of the project, which includes the platform modifications and pipeline conversion at Platform Gina, is not subject to Commission permit authority because Platform Gina is located in the OCS. However, these project activities are described in detail in the Development and Production Plan (DPP) Revision, affect the coastal zone, and require a federal licence or permit. Therefore, the Commission has the authority to review the proposed project for consistency with the certified California Coastal Management Program (CCMP), pursuant to Section 1456(c) of the Coastal Zone Management Act (16 U.S.C. Section 1451 et seq.). Because the Chapter 3 policies of the Coastal Act are also the enforceable standards of the CCMP, Chapter 3 Coastal Act policies are the standards for both the Commission's consistency and permit review.

To minimize duplication and speed the project's review process the staff has combined the Coastal Development Permit and Consistency Certification Review into one staff report scheduled for one Commission hearing. However, Commission approval, modification, or disapproval of this project will require separate actions on the coastal development permit application and the consistency certification.

SYNOPSIS

UNOCAL has submitted a Platform Gina Development and Production Plan (DPP) Revision for: (1) the repair and conversion of a 6 5/8 inch water return pipeline to transport sweetened gas; and, (2) for the addition of gas processing facilities to Platform Gina. The original DPP for Platform Gina, including the water return pipeline and the oil pipeline, was certified by the Commission in 1979. The Commission later issued a Coastal Development Permit in 1981 for the installation of the pipeline in state waters.

Commission Review The onshore portion of the project (700 feet of pipeline replacement) is within the City of Oxnard's permit jurisdiction, and is not before the Commission for permit review. As discussed in the preceding section (Staff Note), the project before the Commission requires two actions: 1) a Consistency Certification for the platform modifications and pipeline conversion activities at Platform Gina, and, 2) a Coastal Development Permit for the pipeline repair and conversion activities in state waters. (See Page 1 and Exhibit 1(a)(b) for project location and jurisdictional boundaries).

The consistency certification project description includes the mitigation measures required by the City of Oxnard approval. The project also has incorporated the mitigation measures recommended by the Ventura County APCD to meet the onshore air quality rules. Consequently, if UNOCAL fails to fully comply with these mitigation measures or alters the project in any way from the current project description, then the Commission has the right to review the project again under its consistency or permit review authority, as applicable.

Staff Recommendation. Staff recommends the Commission take the following actions in accordance with Sections 30260 and 30262 of the Coastal Act, because the project is coastal dependent and meets the criteria of Section 30260:

- (1) CONCUR with the Consistency Certification for the project.
- (2) APPROVE a Permit, with Special Conditions, for that portion of the project in state waters or lands.

Coastal Act Issues A summary of the project's potential impacts and mitigations is provided here. Further analysis is contained within the report.

1. Air Quality. The gas processing and flaring operations at Platform Gina will result in increased NO_x, SO₂, and ROC emissions contributing to onshore air pollution in Ventura County. Ventura County Air Pollution Control District (VCAPCD) recommended mitigation measures and offsets to bring the project into compliance with VCAPCD's onshore air quality rules. UNOCAL incorporated the mitigation measures, and their agreement to each one, into the DPP Revision Project Description. The project, with the incorporation of these recommended measures and offsets, provides mitigation to the maximum extent feasible.

2. Marine Resources. The seafloor habitat in both the area of pipeline repair and the platform is soft bottom substrate, with no hard bottom outcrops. The project, with the following mitigation measures, reduces the

impacts to the marine resources of the coastal zone to a level consistent with the Coastal Act: 1) an anchoring mitigation plan; 2) abandonment of original pipeline (being replaced) in place in lieu of removal; 3) natural self burial of new pipeline. Further, the project, with the terms of the NPDES Permit for discharge of muds and produced water, provides mitigation to the maximum extent feasible for the impacts to the coastal zone from mud and produced water discharges.

3. Commercial Fishing. As mitigation to minimize the temporary disruption to fishermen and vessel traffic from workboat activity, UNOCAL will post notice at least two weeks in advance with the affected Commercial Fishermen Associations and with the Coast Guard. These measures reduce the potential impacts on commercial and sports fishing to a level consistent with Coastal Act policies.

4. Oil Spill or Hazardous Substance Spill Risk. The proposed gas conversion project does not directly involve the use or transport of oil. However, the construction activities associated with the project have the risk of damaging oil pipelines, and the gas sweetening process involves the use of materials which could be potentially toxic if released in seawater.

The following mitigation measures, which UNOCAL incorporated into the project description, reduce the risk of an oil or hazardous substance spill and associated impacts to the coastal zone to the maximum extent feasible: 1) abandonment of existing water return pipeline, which is tied to oil pipeline, in place; 2) an anchoring mitigation plan and survey of oil pipeline location; 3) securing the workboats for the platform installations to mooring buoys; and, 4) a Spill Prevention Control and Countermeasure Plan (SPCCP), which contains oil spill containment and clean-up measures. Also, UNOCAL will test the gas processing chemicals for toxicity with seawater and transport any chemicals or by-products that can be considered to be hazardous or toxic in sealed containers.

5. System Safety. UNOCAL is proposing to install gas processing facilities on Platform Gina to remove hydrogen sulfide (H₂S) from the gas before it is transported through the pipeline. The project provides mitigation to the maximum extent feasible by including the following measures: 1) a triple redundant H₂S monitoring system; and, 2) a detailed H₂S contingency plan.

6. Geologic Hazards. The seismic hazard and structural studies indicate no major geologic or structural hazards exist which would preclude the gas pipeline conversion or addition of gas processing facilities to the platform. The pipeline meets the pipeline safety and structural standards for transporting gas.

7. Consolidation of Facilities and Cumulative Impacts. The project consolidates facilities to the maximum extent feasible by using existing pipelines and by adding the gas processing facilities to the existing platform. The project, under the terms of the approved NPDES Permit for discharge of muds and produced water, provides mitigation to the maximum extent feasible for the cumulative impacts to the coastal zone from mud and produced water discharges. The project, with the incorporation of the Ventura County APCD's recommended mitigation measures and offsets, provides mitigation to the maximum extent feasible for the cumulative air impacts in the coastal zone.

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- A: Substantive File Document
- B: Standard Conditions for Permits
- C: Development and Production Plan Timeline
- D: City of Oxnard: Approval and Conditions
- E: State Lands Commission Mitigation Requirements

1. STAFF RECOMMENDATION

The staff recommends that the Commission adopt the following resolutions, conditions, findings, and declarations:

A. RESOLUTIONS

1. Concurrence with Consistency Certification

The Commission hereby concurs with the consistency certification made by UNOCAL Corporation (UNOCAL) for the proposed project described in its Platform Gina DPP Revision. This project includes the conversion of the water return pipeline to gas sales service, the modification of Platform Gina to include a maximum of seven additional wells and temporary and permanent gas sweetening facilities. Although the project will affect the coastal zone, it will meet the policies of the approved California Coastal Management Program (CCMP), and is therefore consistent with the CCMP. The Commission specifically finds that the proposed project includes adequate information to allow an assessment of the probable coastal zone effects of these portions of the project, including cumulative impacts, and that the project complies with the enforceable policy requirements of the California Coastal Management Plan (CCMP). The Commission furthermore finds that the project implements the national interest as required by Chapter 11 of the CCMP and sections 302 and 303 of the CZMA.

2. Approval of the Coastal Permit with Conditions

The Commission hereby grants a permit, subject to the conditions below, on the grounds that the development as conditioned, will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976 and will be in conformity with the California Environmental Quality Act. This permit covers that portion of the proposed UNOCAL Platform Gina Project, which is located in state waters and lands, and includes: (1) repair and replacement of the water return pipeline; (2) pipeline conversion to gas sales service.

B. CONDITIONS OF PERMIT

1. Standard Conditions

See Appendix B.

2. Special Conditions

a. Terms of Permit.

The project, as described for purposes of this permit, has incorporated the conditions imposed by the approvals from the State Lands Commission (Appendix E). Therefore, these conditions are incorporated herein, by reference, as conditions for this project and are enforceable by the Coastal Commission. If the permittee fails to comply with these conditions, or alters the project in any way than what is currently described, then the permittee must obtain a new permit or an amendment to this permit, which will require Coastal Commission review.

b. Abandonment and Removal of New Replacement Pipeline .

Prior to termination of the operation of the replaced section of pipeline, which has been converted to gas sales service, the permittee shall submit an application for a coastal permit for the abandonment of the pipeline section which is within the Coastal Commission's permit jurisdiction. This application shall include a plan for the abandonment and removal of the said pipeline. The permittee shall abandon the pipeline in accordance with the terms of any permit granted by the Coastal Commission. (See Appendix E.)

c. Abandonment of Original Water Return Pipeline.

The section of original pipeline on the beach, from MHTL to MLLW, shall be removed to 0 feet below MLLW. The original pipeline section, from MLLW to seaward, may be abandoned in place, but must be filled with concrete for its entire length and be capped with one quarter (1/4) inch steel cover plates welded onto each end. This abandonment in place is to be considered a temporary abandonment of the concrete filled portion of the 6 5/8 inch pipeline, with the understanding that complete removal of this pipeline portion may be required by the Coastal Commission in the future if removal of the adjacent 10 3/4 inch oil pipeline is also required upon its abandonment.

After filling with concrete, the abandoned pipeline may be left to self-bury in natural conditions. The permittee shall submit a survey to the Coastal Commission within two years of abandonment completion to document whether the pipeline has successfully buried itself to the a depth of two feet from zero MLLW to minus fifteen (-15) below MLLW. If the pipeline has not buried itself to the above standards by the end of two years, the permittee must submit a plan for hydraulic jetting burial or removal to the Executive Director of the Coastal Commission for review. The Executive Director, in consultation with State Lands Commission, will review the plan and determine if the pipeline will need to be removed or reburied, and if an amendment or a new coastal permit is required. The permittee will abandon the pipeline in accordance with terms of the amendment or new coastal permit, whichever is required.

Furthermore, at any time in the future, if the concrete filled portion of the pipeline becomes unburied for a period exceeding one month, or is considered to be a health and safety hazard or disruption to fishing, then the applicant must notify the Executive Director of the Coastal Commission and submit a plan for the removal or reburial of the pipeline. The Executive Director, in consultation with State Lands Commission, will review the plan and determine if the pipeline will need to be removed or reburied, and if an amendment or a new coastal permit is required. The permittee will abandon the pipeline in accordance with terms of the amendment or new coastal permit, whichever is required.

d. Burial of New Replacement Pipeline Section.

The replacement pipeline shall be placed so that a lateral separation of at least three feet is maintained from any portion of the original (replaced) pipeline left in place.

The replacement pipeline shall be buried under a minimum of four feet of sand cover across the beach area (from MHTL to MLLW) to at least zero feet MLLW. Seaward of MLLW, the new replacement pipeline shall be left to self bury.

If natural conditions fail to bury the new pipeline to a depth of two feet from zero MLLW to minus fifteen (-15) below MLLW within two years, then the permittee shall bury the line with hydraulic jetting to three feet below the sand bottom within these limits. Within two years the permittee shall submit, to the Executive Director of the Coastal Commission for review, a survey documenting the success of self burial

Furthermore, in the event, the new replacement pipeline becomes unburied anytime in the future, for a period exceeding one month or if it poses a health and safety hazard or disruption to fishing, the permittee must notify the Executive Director of the Coastal Commission with a plan for reburial of the pipeline. The Executive Director will review the plan and evidence, in consultation with State Lands Commission, and determine if the pipeline can be left to selfbury or will need to be reburied using hydraulic jetting. the permittee shall rebury the pipeline in accordance with the terms of the amendment or new coastal permit as required by the Coastal Commission.

e. Construction Schedule and Grunion Spawning Season

Construction activities for the nearshore and onshore pipeline replacement activities shall only be conducted during the month of February in order to avoid the grunion spawning season, which extends from March to August. Any extension of construction activities beyond March 1, 1992 require the approval of the Executive Director of the Coastal Commission. Approval will be based on a recommendation from the California Department of Fish and Game that the remaining activities will not adversely impact the grunions spawning on the beach within the construction area.

f. Consolidation

To assure that consolidation of oil and gas facilities within the Coastal Zone occurs to the maximum extent feasible and legally permissible, the permittee shall accept if asked by another party, to transport in permittee's pipelines to the onshore treating facility without discrimination oil and gas produced from submerged lands provided that:

- a) All necessary government permits for such transportation and related activities are obtained;
- b) Such transportation and related activities are economically, environmentally, and technically feasible;
- c) There is excess capacity in permittee's pipeline above and beyond that for which contractual commitments have been made; and
- d) Consolidation will not result in adverse environmental consequences, will not significantly reduce the number of producing wells, support facilities or sites required to produce the reservoir economically and with minimal environmental impacts.

II. FINDINGS AND DECLARATIONS

A. COMMISSION REVIEW OF DEVELOPMENT AND PRODUCTION PLANS

The Commission has authority to review Development and Production Plans (DPPs) and subsequent DPP Revisions for consistency with the California Coastal Act because the federal government has approved the California Coastal Management Program (CCMP) under the CZMA. The Chapter 3 policies of the Coastal Act are the enforceable standards of the CCMP. The Commission has up to six months to review and evaluate the DPP's Revisions proposed activities and their impacts on the State's coastal zone in order to determine if the proposed project is consistent with the CCMP.

UNOCAL certifies that the proposed project activities described in the Platform Gina DPP Revision are consistent with the CCMP. UNOCAL has stated it has applied or will be applying for the federal licenses and permits listed below. By concurring in UNOCAL's certification, the Commission informs these respective federal agencies listed below that it considers the proposed project described in the above mentioned DPP Revision to be consistent with the CCMP.

<u>Federal Agency</u>	<u>License or Permit Required</u>
Mineral Management Service	Approval of the DPP Revision
U. S. Environmental Protection Agency	General NPDES Permit
U. S. Army Corps of Engineers	A Nationwide Permit was issued for this project in February 1990 and is valid until February 1991. UNOCAL is in the process of renewing this permit.

1. NEPA/CEQA Requirements

An Environmental Assessment was prepared jointly with the State's Environmental Impact Report (EIR-78-19) and certified for the original Platform Gina DPP in 1979. MMS determined that the pipeline repair and platform modifications proposed in this DPP Revision required an additional Environmental Assessment, to be completed in the near future, but did not require a supplemental Environmental Impact Statement (EIS).

In accordance with the California Environmental Quality Act (CEQA) an Initial Study was performed to determine if a new or supplemental EIR was necessary. The City of Oxnard acted as lead agency in the preparation of the Initial Study and certified the Final Initial Study in September 1990. For this Initial Study, UNOCAL prepared the following environmental documents: 1) Environmental Assessment and Beach Vegetation Study; 2) Pipeline Self Burial Study; 3) Risk Assessment Study. On the basis of the Initial Study, and in accordance with Section 15070 of the California Administrative Code, the City

of Oxnard, as lead agency, determined that the proposed project would not produce or be subject to significant environmental effects. A Negative Declaration was issued, and no new EIR or supplemental EIR was required.

B. PROJECT DESCRIPTION AND BACKGROUND

1. Background

On September 23, 1991, the Minerals Management Service (MMS) accepted for submittal a Development and Production Plan (DPP) Revision proposed by UNOCAL Corporation (UNOCAL) for Platform Gina. The original DPP for Platform Gina (Lease OCS-P 0202) and two pipelines to shore was submitted by UNOCAL in 1979. The Commission concurred with the DPP's Consistency Certification on November 7, 1979. The Platform Gina DPP, with the two pipelines, was approved by MMS in 1980. In May 1981, the Commission issued a Coastal Development Permit for the onshore and nearshore portions of the project in the Commission's permit jurisdiction, which included the installation of the two pipelines in state waters and lands. .

Platform Gina was originally certified in 1979 for oil and gas production, with the expectation that oil would be the primary product. However, exploratory wells indicate there is the potential for more gas reserves than oil reserves. The proposed project will make no changes to the oil production operation. Rather, the proposed project focuses on modifying the platform and pipeline to allow for the exploration and production of the additional gas reserves.

Platform Gina is located 4.5 miles offshore Ventura County (six miles southwest of Oxnard, California) within OCS P-0202 in Federal waters (see Exhibit 1). Platform Gina is in 95 feet of water and has been in production in the Hueneme and Sespe Zones since 1982. Currently, there are 15 total well slots on Platform Gina: 6 oil producing wells, 5 injection wells, and 1 exploration well (H-14), and 3 unused slots. Two subsea pipelines, a 10 5/8 oil pipeline and a 6 5/8 water return pipeline connect Platform Gina to the Mandalay facility, which is located in Oxnard, California.

At present, Platform Gina produces oil and gas (naturally sweetened) which is transferred by electric submersible pump systems through the 10 5/8 inch oil pipeline to the Mandalay onshore processing facility. Oil and water separation and treatment are conducted at the Mandalay facility. Originally produced water was returned to Platform Gina through the 6 5/8 inch pipeline for disposal. However, the 6 5/8 inch pipeline has been out of service since October, 1988, when a leak was detected in the pipeline near the Mandalay facility. Produced water is currently, and will continue to be, piped to Platform Gilda, for discharge into the ocean in accordance with the General NPDES permit.

Platform Gina has undergone three previous modifications. The first project was the minor structural modification of the platform drilling deck to allow for higher hook loads during the drilling of H-13 and H-14. The second modification was construction of a 23 foot by 40 foot production deck

extension on the west side of the platform to provide for temporary test equipment. At that time, a temporary flare stack was also installed. The third modification was installation of a complete ambient hydrogen sulfide monitoring system on Platform Gina as a safety precaution. This system consists of eight monitors around the platform which monitor the air for hydrogen sulfide (H₂S). In 1989, a permanent flaring system was completed in order to provide for future well testing and permanent processing of the production at GINA. This system is designed for a maximum throughput of 18 million standard cubic feet of gas per day (MMSCFD). The flare boom system provides a flare scrubber, seal drum, smokeless burner, and a flame extinguisher system.

2. Description of Project and Construction Schedule

Exhibit 1a shows the platform location and pipeline route. Exhibit 1b shows the area of pipeline repair activities. The proposed project before the Commission for review consists of the following components (see DPP Timeline, Appendix C, for details on the timing of these components):

- o The repair and replacement of the 6 5/8 inch water return pipeline, extending from MHTL to 2300 feet offshore. (This requires a Coastal Development Permit (CDP) since it is located in state lands and waters.)
- o The conversion of the 6 5/8 inch water return pipeline to gas sales service. (This requires a CDP for that section of pipeline in state waters and lands, and a Consistency Certification for that portion in federal waters.)
- o The drilling of a maximum of seven additional wells from Platform Gina in order to test and develop a potential gas reservoir in the area (Consistency Certification required);
- o The installation of temporary gas sweetening facilities for the removal of hydrogen sulfide (H₂S) from the product gas stream, as the wells are being tested (Consistency Certification required);
- o The installation of permanent redundant hydrogen sulfide monitoring system, with two monitors at Platform Gina and one monitor at the Mandalay facility (Consistency Certification required for the monitors at the platform, City of Oxnard issued CDP for the monitor at the Mandalay facility);
- o The installation of permanent gas sweetening facilities, and expansion of deck, at Platform Gina, when production proceeds to reaches full field development with the seven wells (Consistency Certification required).

3. Description of Environment in Onshore Portion of Project (City of Oxnard Permit Jurisdiction)

The City of Oxnard has issued a Coastal Development Permit (CDP), with special conditions (see page 12 and Appendix D), for that portion of the project from MHTL 700 feet landward to the Mandalay facility. The CDP was not appealed, therefore this onshore portion of the project is not before the Commission for permit review. However, as part of the conditions for the CDP, UNOCAL agreed to implement several mitigation measures to reduce impacts to the sensitive dune habitat and to reduce public access impacts. These are discussed below.

Part of the onshore pipeline route runs through a conduit underneath sand dunes. The dune area contains the following plants: silver beechwood, heliotrope, sea rocket, sea fig, and beach grass. Only silver beechwood and heliotrope are native to California and neither is rare. (Environmental Assessment and Beach Vegetation Study, UNOCAL, August 1990.) The new pipeline will be threaded through the conduit, thus eliminating the need to excavate through the dunes. Therefore, there should be minimal disturbance to the dune itself. The only vegetation expected to be affected by the excavation work will be that on the small area of the foredune at the conduit opening. The species expected to be affected by this limited disturbance are sea rocket and heliotrope. To minimize the area of plants disturbed, the project description states that UNOCAL will fence off the dune area except for the immediate vicinity of excavation and construct a wooden staircase over the work path between Mandalay facility and the excavation area. The project description specifies that UNOCAL will recontour the affected area and revegetate with seeds from the plants originally there as well as new plants.

There will be temporary impacts on public access in the beach area within the city. The immediate vicinity of the beach surrounding the pipe fabrication staging area is not used extensively by the public because of limited access around the Mandalay facility. An entrance to McGrath State Park is about one-quarter mile northward up the beach (See Exhibit 1). To reduce the impacts on public access, UNOCAL incorporated project specific mitigation measures, which were required as conditions in the CDP, into the project description (see Appendix D).

4. Maximum Production Capacity

UNOCAL has stated that no additional facilities or pipelines, other than those specified for this project, would be required to accommodate the additional gas production from the development of the new wells. They further state that it is a maximum of seven wells that could be drilled, and that fewer may be drilled depending upon the success ratio. (Letter to Thomas Dunaway, MMS, September 6, 1991.)

On a daily basis the maximum gas production rate range expected for each well is 1 to 5 MMSCFD (million standard cubic feet per day) of gas or an average of 2.25 MMSCFD of gas for the eight wells (seven new wells plus the existing producing well). This equals a total of 18 MMSCFD of gas. This 18 MMSCFD is

the daily rate upon which what UNOCAL based the proposed project's facility design and pipeline repair and conversion design. (Letter to Thomas Dunaway, MMS, September 6, 1991.) UNOCAL has stated that maximum daily gas production will not exceed this daily rate of 18 MMSCFD.

5. Construction Schedule

Expected start date for the proposed activities is February 1, 1991. UNOCAL estimates the pipeline repair will take a total of 19 days. This includes 11 days onshore and 6 days offshore, and two days for bad weather.

C. OTHER AGENCY APPROVALS

As previously stated, UNOCAL's proposed project requires the review and approval of the above mentioned federal agencies. In addition, as discussed below, the proposed project required the approval of the City of Oxnard and State Lands Commission for those portions of the project within their jurisdictions. Review by the Ventura County Air Pollution Control District (APCD) was also required (see Section 1: Air Quality).

The consistency certification project description includes the mitigation measures required by the City of Oxnard approval. The project description also has incorporated the mitigation measures recommended by the Ventura County APCD to meet the onshore air quality rules. Consequently, if UNOCAL fails to fully comply with these mitigation measures or alters the project in any way from the current project description, then the Commission has the right to review the project again under its consistency or permit review authority, as applicable.

1. City of Oxnard.

Instead of issuing new permits for this project, the City of Oxnard has issued an amendment to UNOCAL's existing Coastal Development Permit 85-5 and a modification to its Special Use Permit 806, which were previously issued for the pipeline and Mandalay facility. The City also issued an encroachment permit authorizing use of city owned beach land for the pipe fabrication area.

Resolution No. 7519 (which was approved by the City Planning Commission on February 7, 1991) modified UNOCAL's existing Special Use Permit 806, and authorized that portion of the pipeline project within the City's permit jurisdiction, which includes: 1) the repair and replacement of 700 feet of the water return pipeline from mean high tide level (MHTL) landward to the Mandalay facility; 2) conversion of that section of pipeline to gas sales service; and, 3) modification to the piping and installation of an H₂S redundant monitoring system at Mandalay. Resolution 7519 requires that the proposed project is subject to; 1) the original standard and special conditions of Special Use Permit (SUP) 806; and, 2) the conditions set forth in the amendment to Coastal Development Permit (CDP) No. 85-5, which was issued November 8, 1988.

No appeals were filed for this CDP amendment and SUP modification, therefore this section of the pipeline project, as described above, is not before the

Commission for permit review. However, as noted above the consistency certification project description incorporates the conditions required by the City of Oxnard. (See Appendix D for City of Oxnard Conditions.)

2. State Lands Commission Lease Provisions.

On September 23, 1991, the State Lands Commission granted an amendment to UNOCAL's lease for that section of pipeline located in state waters and on state land. This amendment authorized the conversion of the water return pipeline to gas sales service, subject to a set of special conditions. (See Appendix E.) The project as described for purposes of the permit application, includes these special conditions.

D. COASTAL DEPENDENCY AND RELATION TO INDUSTRIAL DEVELOPMENT

Section 30101 of the Coastal Act defines a coastal dependent development or use as that which "requires a site on or adjacent to the sea to be able to function at all." Ports, commercial fishing facilities, offshore oil and gas development, and mariculture are specifically referenced in Section 30001.2 of the Coastal Act as coastal dependent developments and are thus given priority over other development on or near the shoreline. The Commission therefore finds that UNOCAL's proposed submarine pipeline replacement and the proposed modifications to Platform Gina are coastal dependent industrial activities.

Section 30260 of the Coastal Act provides for further consideration of coastal dependent industrial facilities if they fail to meet other policies contained in Chapter 3 of the Coastal Act. This section states, in part:

...where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with the other policies of this division, they may nonetheless be permitted in accordance with this section and sections 30261 and 30262 if: (1) there are no feasible less environmentally damaging locations for the project; (2) denial of or objection to the project would adversely affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.

If the Commission determines that a coastal dependent industrial facility, such as an offshore oil and gas development, is inconsistent with specific Chapter 3 Coastal Act policies, it has the discretion whether to invoke its authority to permit a project under the "override" provisions of Section 30260. Where the Commission decides to do so, it must make affirmative findings with respect to the three criteria contained in Section 30260, and the criteria in Sections 30261 and 30262.

Thus, Section 30260 provides special criteria for coastal dependent oil and gas facilities which have satisfied the requirements of Sections 30261 and 30262 but have failed to satisfy the other Chapter 3 policies. Therefore, the proposed Platform Gina project must be found to be in conformity with the requirements of Sections 30261 and 30262 before the overriding consideration provided in Section 30260 can apply.

The Commission found that this coastal dependent oil and gas development project does not meet all the Coastal Act policies. Therefore, for this project, the Commission chose to evaluate the project under the "overriding considerations" of Section 30260. The proposed project does not involve tanker facilities or liquified natural gas terminals, consequently Section 30261 is not applicable. Therefore, for purposes of permit and consistency review, the Platform Gina project has been evaluated under the requirements of Section 30262 and under all the criteria provided in Section 30260 of the Coastal Act. (Section 11 of this report elaborates on the application of the requirements of sections 30260 and 30262.)

A. COASTAL ACT ISSUES

1. Air Quality

Sections 30253(3) and 30414(c) of the Coastal Act require new development be consistent with state and local air pollution control standards. Further, Section 30250(a) requires that development will not have adverse impacts, either individually or cumulatively, on coastal resources.

Additionally, Section 307 of the Coastal Zone Management Act directs that federal, state, and local requirements adopted pursuant to the Clean Air Act shall be the air pollution control requirements applicable to the state and local coastal zone management programs.

The 1990 Amendments to the Federal Clean Air Act mandate that the requirements for offshore sources be the same as requirements that would apply if the source were located onshore (16 U.S.C.1456(f)). The 1990 Clean Air Act also requires EPA to adopt regulations regulating OCS air emissions by November 15, 1991. EPA did not meet the deadline and is now expected to issue the draft regulations for a 60 day comment period in December 1991.

Platform Gina is located within the South Central Coast Air Basin, approximately 4.5 miles offshore Santa Barbara and Ventura Counties. The meteorological conditions of this coastal area are such that pollutants released at the offshore platform would impact the onshore areas of both Santa Barbara County and Ventura County. Santa Barbara County APCD agreed that since Platform Gina and the associated pipelines were geographically closer to Ventura County, therefore Ventura County APCD's rules would apply to the proposed modifications. However, Ventura County APCD coordinated with Santa Barbara County APCD in the review of the project's onshore air impacts.

a. Impacts

The potential onshore impacts resulting from the proposed project would occur primarily as a direct result of the flaring aboard Platform Gina. The equipment that exists or will be added to Platform Gina for the purposes of producing, processing, and shipping the gas will be all electric. All drilling will be (as is currently) performed by an all-electric drilling rig. The number of personnel and transportation requirements will remain the same. Thus, there will be no new sources of air emissions directly related to these operations.

There will be residual waste or "tail gas" generated by the gas sweetening process, and this gas will be burned using a flare. In addition, the flare will also be used to dispose of gas generated by well testing operations and upset process conditions. The additional gas flaring will result in onshore air impacts from increases in the following emission pollutants: oxides of nitrogen (NO_x); Reactive Organic Compounds (ROC); Carbon Dioxide (CO); Particulate Matter (PM); and Sulphur Dioxide (SO_2). (More detail on these emission data can be found in Appendix 3 of the DPP Revision; Ventura County APCD Comment Letter, November 15, 1991; UNOCAL Response to Ventura County APCD Comment Letter, November 21, 1991; and Santa Barbara County APCD Comment Letter, December 2, 1991.)

Both Santa Barbara and Ventura Counties are classified as non-attainment areas for ozone, exceeding both federal and state standards. The increase in NO_x and ROC emissions, as a result of the project, will contribute to a further increase in ozone, which is a photochemical pollutant formed in the atmosphere through a reaction of NO_x and ROC. Ventura County APCD Rule 26 implements the California Clean Air Act requirement of "no net increase in emissions" by requiring all increases of NO_x and ROC from operations to be fully offset.

The project description states that the proposed sulphur removal system is capable of removing 98.5% of the sulphur (SO_2) from the gas stream. Consequently, 1.5% (or 17.6 tons) of the sulphur will escape into the atmosphere. Ventura County APCD Rule 26 requires SO_2 emissions to be offset if they exceed 15 tons per year. Ventura County Rule 54, Sulphur Compounds, also specifies limits for SO_2 and H_2S concentrations from air pollution source and from the sulphur content of fuels. Ventura County APCD Rule 26 also requires all new or modified sources of ROC, NO_x , SO_x and PM_{10} to be equipped with Best Available Control Technology (BACT). Therefore, a tail-gas clean-up unit may be required to further reduce the SO_2 emissions generated by the gas sweetening process and comply with the BACT requirement of Rule 26.

b. Mitigation Measures

In order to mitigate the individual and cumulative onshore air impacts resulting from the project and meet the onshore air quality rules, Ventura County APCD has recommended that if the Commission is to concur with the consistency certification, then UNOCAL must include the following measures in its project description:

- 1) Provide offsets in accordance with Ventura County APCD Rule 26, New Source Review, for all permanent NO_x and ROC emissions caused by the project.
- 2) Provide offsets in accordance with Ventura County APCD Rule 26, New Source Review, for all permanent SO_2 emissions increases caused by the project if such emissions are projected to exceed 15 tons per year.

- 3) Install BACT (Best Available Control Technology) in accordance with Ventura County APCD Rule 26, New Source Review, on all new and modified gas processing equipment on Platform Gina. The Santa Barbara County APCD has established BACT for onshore sulfur recovery units as a tail gas clean-up unit with 99.9% control or 100 ppm H₂S incinerator feed gas, whichever is more stringent. The [Ventura County] District will make a formal determination of BACT on request. Since BACT determinations require a substantial amount of APCD staff time, UNOCAL shall reimburse the District for the time spent in making the BACT determination in accordance with the [Ventura County] District's fee schedule.
 - 4) Operate all components on Platform Gina in compliance with the provisions of Ventura County APCD Rule 74.10, Components at Crude Oil Production Facilities and Natural Gas Production and Processing Facilities. UNOCAL shall submit an Operator Management Plan as required by Rule 74.10 within 90 days of the commencement of gas production or processing.
 - 5) Adjust the SO₂ emission factor and resulting calculated emissions if the actual H₂S concentration of the sour gas is found to be different than the assumed value of 2000 ppm. For the purpose of preliminary estimations, the emission factor of 357.2 lbs/MMCF shall be used.
 - 6) Continuously record the gas flaring rate (not including well testing operations) and calculate emissions using the following emission factors to demonstrate that annual emissions do not exceed the amount of offsets that have been provided for the project:

ROC	-	144 lbs/MMCF
NO _x	-	51.5 lbs/MMCF
SO ₂	-	357.2 lbs/MMCF (or as described in #5 above)*
CO	-	40 lbs/MMCF
PM	-	3 lbs/MMCF

* If sweetened gas is flared, the emission factor shall be adjusted accordingly.
- UNOCAL shall make such records available to the Ventura County District on request.
- 7) Treat the gas flared during well testing operations to less than 300 ppm H₂S. UNOCAL shall collect and analyze at least one gas sample per day of well testing to confirm that the H₂S concentration does not exceed 300 ppm.

Ventura County APCD requested the Commission certify consistency of the project with respect to Ventura County's air pollution control requirements

only if the above conditions are made enforceable. UNOCAL has incorporated these Ventura County APCD mitigation measures, and their agreement to each one, into the project description. These conditions also have been included as conditions in the MMS permit, and will be enforced by the MMS.

c. Compliance With Coastal Act Air Quality Provisions

In accordance with Section 30414 of the Coastal Act and Section 307 of the CZMA (as noted above), the Commission must independently determine whether a standard or control program has been met by a project on the OCS; however, under Section 30414, the Commission may not modify an existing standard or control program. From the review of the evidence available to the Commission and from consultation with the affected APCDs, the Commission concludes the above mitigation measures recommended by Ventura County APCD reduce the individual and cumulative air quality impacts to the coastal zone caused by the project. However, the project still causes adverse air impacts in the coastal zone. Therefore, the Commission finds the project is inconsistent with Sections 30253, 30414, and 30250 of the Coastal Act.

However, as discussed previously, this project is considered to be coastal dependent, and therefore the project may nevertheless be approved if it meets the criteria in Section 30260. The required mitigation measures include Best Available Control Technology and full offsets for remaining emissions resulting from operations. Therefore, the Commission finds that the project provides maximum feasible mitigation and is consistent with section 30260 of the Coastal Act. (see section 11 for discussion of Section 30260.)

UNOCAL has incorporated the above mitigation measures recommended by Ventura County APCD (VCAPCD), and their agreement to comply with each one, as an integral part of the project description. Therefore, if UNOCAL fails to fully comply with any of the above VCAPCD Mitigation measures as part of their MMS permit or seeks to alter the project in any way that would cause it to not comply fully with the above mitigation measures, then the Commission has the right to review the project again, at that time, in accordance with its consistency review authority.

2. Marine Resources

The Coastal Act provides for the protection of marine biological systems. Special protections are provided for areas and species of special biological significance (Section 30230), for rare, threatened and endangered species and their habitats (Section 30240), and for biological productivity of coastal waters (Section 30230 and 30231).

The proposed pipeline repair and platform modifications raise several marine resource issues under the Coastal Act because the proposed development will result in the following: 1) disturbance of marine benthic organisms and bottom habitat from the pipeline repair construction activities; and 2) possible disturbance of whale migration from platform construction activities.

a. Impacts to Seafloor and Marine Organisms from Pipeline Repair

UNOCAL proposes to replace the pipeline from Mean High Tide Level (MHTL) out to a tie-in point at 2300 feet offshore. The seafloor in the pipeline area is soft bottom substrate, with no hard substrate outcrops.

Unocal proposes to fabricate the pipeline onshore and then pull the pipe through the water above the sea floor to its tie-in point offshore. The pipe's only point of contact with the seafloor during the pulling operation will be at the tie-in point. After the tie-in is completed the pipe will be laid on the bottom. Thus, disturbance to the benthic and marine organisms from the pipelaying will be minimal.

In order to avoid disturbance to benthic and marine organisms that would occur if hydraulic jetting was used to bury the pipeline, UNOCAL proposes to let the new pipeline bury itself. As a consultant to UNOCAL, the Hydraulic and Coastal Engineering Division, U.C. Berkeley, investigated the potential for pipeline self-burial in "Evaluation of the Potential for Self-Burial of the proposed Unocal Gina Pipeline" (Farrier, Foda and Bea, 1989). The main focus of this report was in the pipeline route from MLLW to a distance 3,000 feet offshore (-40 feet water depth). The pipeline will be covered with a one inch thick coating of concrete for additional weight. The self-burial evaluation studied the wave-current environment and the local geology and sedimentology of the Mandalay Beach area. It concluded that the pipeline should bury approximately 8.5 to 15 inches within a week of the first annual storm. Extreme storms may cause soil liquefaction which would increase settlement and burial of the pipeline. The theoretical final depth of the pipeline was estimated to be 10 to 15 feet, but the probable burial depth within 1 to 10 years was estimated to be 2 to 4 feet. "Eventual breakout of the pipeline is unlikely since there is an annual increase in bed level elevation" (Farrier, Foda, and Bea, 1989).

A burial of 2 to 4 feet will prevent the pipeline from being a potential snagging hazard for fishermen. State Land's conditions require: 1) replacement pipeline shall be buried under a minimum of four (4) feet of sand cover across the beach area; 2) seaward of MLLW, the pipe may be left to bury in natural conditions; 2) the replacement pipe shall be placed so that a lateral separation of at least three (3) feet is maintained from any portion of the original (replaced) pipeline left in place.

If within two years, the pipeline does not bury itself to a depth of 2 feet from 0 feet mean lower low water (MLLW) to at least minus fifteen (15) feet below MLLW, UNOCAL has agreed, as a condition of its lease with State Lands, to bury it to a depth of 3 feet using hydraulic jetting. As a condition of this permit, UNOCAL has further agreed that if this new pipeline becomes unburied at any time in the future, it will bury the pipeline.

The Department of Fish and Game has recommended that the existing water return pipeline (which is buried) be abandoned in place to minimize additional impacts to benthic organisms. Abandonment of the existing pipeline in place

will also reduce risk of oil spill from the adjacent oil pipeline to which it is tied. The project as proposed specifies abandonment of the pipeline in place as recommended. However, as a condition of this permit, that if the abandoned pipeline becomes unburied and hazardous in the future, UNOCAL will be required to remove the pipeline at that time. In such an event, UNOCAL would need to obtain an amendment or a new permit from the Commission for the removal of the pipeline.

In addition to concern about impacts to the benthic and marine organisms from the pipeline itself, there is concern for impacts to the seafloor from anchor scarring from the work boats. As mitigation, UNOCAL has prepared an anchoring plan to avoid or minimize potential impacts, and has incorporated this plan as part of the project description.

There is also a potential impact to grunions from the pipeline repair activities. Grunions spawn along the beach in the vicinity of the construction area from March to August. To avoid impacts to the grunions UNOCAL has scheduled the pipeline repair for the month of February. In the event the pipeline repair activities are delayed and could therefore interfere with the grunion spawning season, UNOCAL has agreed to notify the Commission of any alteration in the pipeline repair schedule and, if the Commission determines it is necessary, to postpone the repair activities until after the Grunion spawning season ends.

Based on the evidence reviewed, the Commission concludes that the mitigations UNOCAL will use to replace the pipeline reduces the potential adverse impacts to the soft bottom substrate, benthic organisms, and marine resources to a level consistent with Coastal Act policies. Therefore, for purposes of the permit review, the Commission finds the pipeline replacement activities, with the mitigation measures provided, to be consistent with Sections 30230, 30231, 30240 of the Coastal Act, with respect to pipeline construction impacts.

b. Impacts to Whale Migration

Southward migration for the California gray whale in the Santa Barbara Channel is December and January; northward migration usually occurs between early February and June in this area. Whales migrate through both state and federal waters. However, it should be noted the pipeline repair area in state waters (to 2300 feet offshore) is outside the normal whale migration route in this area. The platform is existing and has not appeared to hinder whales on their migration. No new platform is proposed, therefore there will not be any new obstruction placed in the water to interfere with whale migration.

The facility installation at the platform (expected duration is one month) will be performed from workboats secured to a mooring buoy or the platform. According to an informal consultation with the National Marine Fisheries Service the proposed project activities will not adversely impact whale migration.

Based on the evidence reviewed the Commission concludes that the project activities in both state and federal waters will not adversely impact the gray

whale migration. Therefore, for purposes of both permit and consistency review, the Commission finds the proposed project consistent with Sections 30230, and 30231 of the Coastal Act, with respect to whale migration.

3. Ocean Disposal of Drilling Muds and Produced Water

Sections 30230 and 30231 of the CCMP provide for the protection of the biological productivity of coastal waters. In addition, Section 30250 provides that new development will not have individual or cumulative adverse impacts on coastal resources.

a. Drilling Muds Discharges

UNOCAL proposes to drill a maximum of seven new wells at Platform Gina. The drilling of the wells beneath Platform Gina could potentially impact the fish population in the State's coastal zone, through degradation and deterioration of water quality as a result of the discharge of additional muds.

Adverse impacts to water uses outside of the coastal zone may affect water quality and marine resources within the zone. In this case, the discharge of drilling muds into waters of the federal OCS, may cause materials to be carried by water currents and marine organisms crossing into the coastal zone and affecting the water column and marine organisms, including those dependent on benthic habitats for their survival. Important secondary impacts could include reduction in the productivity of the commercial fisheries. The degree or extent of these impacts is not fully understood.

The seafloor at Platform Gina is soft substrate. According to surveys there is no hard substrate in the immediate vicinity. UNOCAL proposes to avoid or minimize impacts to the seafloor and the water column by installing the additional well slots within the boundaries of Platform Gina in the existing wellroom. This eliminates the need for additional legs to be set on the bottom of the seafloor or the construction of a deck extension for drilling operations. (Letter to MMS, September 6, 1991.)

Platform Gina currently has 15 well slots, which were certified in the original 1979 DPP. Only twelve (12) of those well slots are in use at present. For the seven additional wells, UNOCAL proposes to use the three unused slots and add four new slots, within the existing well room. UNOCAL further states (letter to MMS, September 6, 1991):

"Drilling will have a minor one or two day increase in water turbidity for each well. This impact was quantified in EIR-8-19. The impact for the seven new wells would be less than stated in EIR-8-19 for the original 15 wells. EIR-8-19 concluded the impacts [from the 15 wells] to be negligible. Impacts are of a short duration."

The project description states that the maximum daily discharge from muds and cuttings will be : 1) muds - 270 barrels per day; 2) cuttings - 60 barrels per day. UNOCAL disposes of drilling muds and cuttings in the ocean in accordance with the standards and terms of their approved General NPDES Permit

No. 0110516, which has specific effluent limitations, monitoring requirements, and enforcement regulations. In their review of the proposed project, the U. S. Environmental Protection Agency concluded that the measures UNOCAL will use in the drilling of the additional wells and discharge of additional muds (in accordance with the terms of the NPDES permit) minimized individual or cumulative adverse impacts on the deterioration of water quality or degradation of seafloor habitat in the Platform Gina area for the following reasons: 1) the ocean bottom in the Platform Gina area is soft substrate, with no hard substrate nearby; 2) the addition of the seven new wells will bring the total number of wells for Platform Gina to nineteen wells, which is a small number of wells in comparison to some other nearby platforms; 3) this area of the Santa Barbara channel does not have an existing or planned large number of wells in operation, therefore the increased number of wells and mud discharge would not create a significant cumulative adverse impact.

In their review, the California Department of Fish and Game concluded that the discharge limits and method required by the EPA discharge permit would reduce impacts to existing water quality as well as marine resources and habitats in the coastal zone.

The Commission has independent responsibility to determine if the proposed project is consistent with the Coastal Act marine resource protection policies in Sections 30230, 30231, and 30250. Based on the evidence reviewed, the Commission concludes that the mud discharges have potential adverse impacts to the fisheries, water quality and habitat of the coastal zone, although the terms of the NPDES permit for mud discharge may reduce the level of these individual or cumulative adverse impacts. Therefore, for purposes of consistency review, the Commission finds that the project is not consistent with Sections 30230, 30231, and 30250 of the Coastal Act.

However, as discussed previously, this project is considered to be coastal dependent, and therefore the project may nevertheless be approved if it meets the criteria in Section 30260. The Commission concludes that considering the volumes of muds involved, the technology, and the NPDES Permit discharge methods that UNOCAL uses and will continue to use in the discharge of drilling muds, the project's impacts to marine resources in the coastal zone are mitigated to the maximum extent feasible. Therefore, the Commission finds that the project provides maximum feasible mitigation and is consistent with section 30260 of the Coastal Act. (See Section 11 for discussion of Section 30260.)

b. Ocean Disposal of Produced Water

The platform modifications and additional wells will not alter the current status or volume of produced water from Platform Gina. The produced water from Platform Gina's oil development is currently discharged at Platform Gilda in accordance with the terms of the approved NPDES permit. The produced water used in the hydrostatic test of the repaired pipeline will be discharged at Platform Gilda in the same manner.

Based on the review of the evidence, the Commission concludes that considering the one time discharge of hydrostatic test water, and the methods used for discharge of produced water and hydrotest water under the terms of the NPDES

permit, the project's impacts to the marine resources of the coastal zone are mitigated to the maximum extent feasible. Therefore, the Commission finds that the project provides maximum feasible mitigation and is consistent with section 30260 of the Coastal Act. (See Section 11 for discussion of Section 30260.)

4. Commercial Fishing

Policies for the protection of commercial fisheries and associated commercial fishing industries are contained in Sections 30230 and 30231 of the Coastal Act. In sections 30001 (d) and 30001.5, the Coastal Act also reflects the Legislature's intent that consideration be given to social and economic impacts of proposed development. In addition, Section 30260 requires the Commission to consider the public welfare when making decisions on coastal dependent industrial development.

There will be a temporary disruption in commercial fishing activities in California's coastal zone from the project's construction activities and increased workboat vessel traffic activities. However, UNOCAL has incorporated mitigation measures into the project design to minimize these impacts, or avoid impacts wherever possible. These impacts and mitigation measures are discussed below.

The pipeline repair is within the state's coastal waters, extending from MHTL to 2300 feet out from shore. According to the Department of Fish and Game, the commercial fishing activities which occur occasionally in the pipe repair area are gillnet and trap fisheries. Although the pipeline repair project is scheduled to last nineteen days, actual workboat activity in the water for these repairs will be three to four days. Thus, potential disruption to fishermen will be minimized to three to four days.

Halibut trawlers, salmon trollers, trappers, gillnetters, and purse seiners fish commercially in the general vicinity around Platform Gina. Construction activities for the platform modifications are scheduled to last one month, but construction days may be fewer depending on the length of workday (12 hr. vs 24 hr.).

The construction activities for lifting and placing the additional facilities in place involve the use of workboats immediately adjacent to the Platform, within the 500 meter safety zone. Pursuant to the requirements of CFR 33 (147.1103), vessels larger than 100 feet in length are not permitted in this zone. As a result, this area is off limits for the larger commercial fishing vessels. According to the Department of Fish and Game there is not much commercial activity within the 500 meter zone of Platform Gina. However, there are some sports fishermen known to fish within the 500 meter zone.

In order to minimize any potential conflicts with commercial or sports fishing activities resulting from the workboat activities or pipeline repair operations UNOCAL has incorporated the following mitigation measures into the pipeline repair plan: 1) provide advance notice of the construction schedule prior to the commencement of the pipeline repair and platform modification

operations, at a minimum of two weeks in advance, (the notice will be posted with the Joint/Oil Fisheries Liaison Office and placed in the Sea Grant Oil and Gas Newsletter for Fishermen and Offshore Operators.); 2) send notice to the U.S. Coast Guard for posting in the Local Notice to Mariners, at least two weeks in advance, (the notice will include vessels involved, radio calls, and frequencies.); and 3) demarcate the work area with buoys.

The Commission has evaluated the evidence and finds that the proposed project, with the above mitigation measures, minimizes to a level consistent with the policies of the Coastal Act, any potential impacts on the commercial and sports fishing activities associated with the State's coastal zone. Therefore, for purposes of the permit and consistency review, the Commission finds the proposed project activities consistent with Sections 30230 and 30231 of the Coastal Act, with respect to commercial and sports fishing impacts.

5. Oil Spill Containment and Clean-Up

Sections 30230, 30231, and 30232 provide for the protection of coastal and marine resources. Section 30232 requires the protection of the marine environment against the spillage of crude oil, gas, petroleum products, or other hazardous substances. For any development or transportation of these materials, section 30232 further requires "effective containment and cleanup facilities and procedures" for any spills that do occur.

The proposed gas conversion project does not directly involve the use or transport of oil. However, the construction activities associated with the project have the risk of damaging oil pipelines.

a. Oil Spill Risk From Pipeline Repair and Platform Modifications

The water return pipeline repair activities will occur from MHTL to 2300 feet offshore in state waters. The 6 5/8 inch water return pipeline to be replaced is tied to the 10 5/8 inch oil pipeline connecting Platform Gina to the onshore Mandalay facility. The construction activities associated with the installation of the new water return pipeline present an increased risk of oil spill, and therefore the potential for significant adverse impacts to marine organisms and sensitive habitats. Because of the proximity to shore, the likelihood for shoreline contact from an oil spill is even greater.

b. Mitigation Measures to Reduce the Risk of Oil Spill and for Oil Spill Containment and Cleanup

In order to avoid the risk of an accidental oil spill associated with removing the water return pipeline, UNOCAL has specified that the existing water return pipeline will be abandoned in place. In the event UNOCAL would need to remove the abandoned pipeline in the future, UNOCAL would need to obtain a coastal development permit for such removal. As part of that permit UNOCAL would need to ensure that adequate oil spill prevention and containment measures are implemented during removal operations.

To minimize the risk of oil spill and associated impacts during pipeline repair activities, UNOCAL has incorporated the following mitigation

measures into the project description: 1) an anchoring mitigation plan; and, 2) oil spill containment and clean-up measures.

As part of the anchoring mitigation plan the pipeline route area has been surveyed to identify the preferred locations for positioning the anchor. Anchors will be set on position, by an anchor handling boat, to precise predetermined preferred locations in the plan.

UNOCAL also has a designated Spill Response Organization and Plan to respond in the event of an oil spill. Complete information regarding the UNOCAL spill response plan is provided in the Spill Prevention Control and Countermeasure Plan (SPCCP) which is part of the project description. The project plan also states UNOCAL will employ the following project specific oil spill containment equipment and measures during construction activities:

- o The Platform Gina 101 crewboat will be on standby with 750 feet of Expandi-Boom 4300, ready for deployment.
- o An additional 750 feet of Expandi-boom 4300 is stored on Platform Gilda.
- o The 21 foot Boston Whaler will be utilized as a boom tender. In addition, 15 cartons of Conwed Sorbent Boom (360 linear feet) is also maintained aboard Gina and Gilda.

In addition, the project description states UNOCAL is a member of Clean Seas, and in the event that a spill cannot be contained with the standby and platform equipment, the resources of Clean Seas will be used as the primary source mechanism of additional resources.

During the installation of the additional temporary and permanent gas processing equipment on Platform Gina, there is the risk of pipeline damage, and resultant oil spill, from work boat anchors. To avoid this risk, the description provides that UNOCAL will use mooring buoys to secure the work boats. In addition, UNOCAL has specified in the project description that the oil spill containment measures described in the previous section, will be in force during the installation of the new equipment on the platform.

c. Compliance with Coastal Act Oil Spill Protection Policies.

In section 30232, the Commission interprets the word "effective" to mean that spill containment and recovery equipment must have the ability to keep oil off the coastline and/or away from environmentally sensitive marine resources. Unfortunately, the current state of the art equipment available has not proven effective to recover all of the oil from large oil spills and often even small spills in the open ocean. Clean up of open ocean oil spills is extremely difficult; especially those spills which occur during rough seas or large spills.

Based on current oil spill research, the Commission concludes that the project's mitigation measures and oil spill containment and clean up methods

do not have the ability, in all possible oil spill scenarios, to keep the oil off the coastline or away from environmentally sensitive habitats. Therefore, the Commission finds the project, with respect to oil spill protection, not consistent with Sections 30230, 30231, 30232, and 30240 of the Coastal Act.

However, as discussed previously, this project is considered to be coastal dependent, and therefore the project may nevertheless be approved if it meets the criteria in Section 30260. The Commission concludes that the spill prevention and containment measures proposed by UNOCAL, in combination with the industry's Clean Sea's oil spill cooperative, represent the maximum available clean-up capabilities feasibly available at this time. Therefore, for purposes of the permit review and consistency review, the Commission finds that the project provides maximum feasible mitigation and is consistent with Section 30260. (See Section 11 for discussion of Section 30260.)

5. Hazardous Substance Spill Containment and Clean Up

As discussed in the previous section, Coastal Act Sections 30230, 30231, and 30240 provide for the protection of marine resources. In addition, Section 30232 provides for the protection of marine and coastal resources against the spillage of hazardous substances.

The proposed project will add temporary gas sweetening, and eventually permanent gas sweetening facilities to Platform Gina for the removal of Hydrogen Sulfide (H₂S) before the gas is transported by pipeline to shore. The chemicals and by-products for the temporary and permanent gas sweetening processes will be transported between Platform Gina and shore by boat. Therefore, there is a risk of a spill of these chemicals and by-products in to the State's coastal zone waters, which could be toxic when mixed with sea water.

During the initial exploration phase UNOCAL will use temporary gas sweetening facilities. The temporary facilities will use a batch process for the treatment of the gas. The temporary facilities will be used for a maximum of 19 months until the permanent facilities are installed. Currently, UNOCAL is reviewing several possible choices of chemical treatment for the temporary facilities.

UNOCAL states in the project description:

UNOCAL intends to select a process which will be safe, and as non-hazardous as possible. The final selection will be somewhat dependent on the project start date (in order to incorporate the latest industry product development) and may also have to be adjusted after start date of the treatment to best match the specific characteristics of the gas to be treated.

UNOCAL's preference and intention is to utilize chemicals which are DOT regulated as non-hazardous, thus eliminating any hazardous materials problems associated with the storage and transportation of the chemicals to the platform. In addition, in all the processes currently under review, the spent chemicals are considered non-hazardous by the EPA.

a. Mitigation Measures To Reduce Risk of Hazardous Substance Spill and for Containment and Clean Up

For the permanent gas processing facility, UNOCAL will use the Best Available Control Technology (BACT) available at the time (a maximum of 19 months from start date, as discussed above). The BACT to be used will be determined according to Ventura County Air Pollution Control District's standards. (This is discussed in more detail in the Section 1: Air Quality.) The processes to be used will allow regeneration and reuse of the chemicals used in the process, thereby minimizing wastes.

Elemental sulfur will be the most common by-product and it is considered a non-hazardous material. The sulfur will be transported in DOT approved containers. The transport of Sulfur is subject to DOT and Coast Guard Regulations.

In order to avoid or minimize the risk of a spill of hazardous or toxic chemicals, UNOCAL has committed to the following mitigation measures, which have been incorporated into the project description: 1) testing the chemicals for toxicity with seawater using the methods recommended in the 1990 California Ocean Plan test protocols, before the chemicals are used in either temporary or permanent the gas sweetening process; 2) transporting any chemicals or by-products, that are have not been proven to be non-hazardous or toxic, in sealed containers.

In addition, UNOCAL has a Coast Guard approved Transfer Operations Manual as a preventive measure for spills of transported materials. This plan has proven effective to date for preventing accidents of the gas processing materials used on neighboring Platform Gilda. The same procedures would be used for the transport of Platform Gina materials. UNOCAL also has on file a Ventura County approved Hazardous Material Business Plan for the Port Hueneme Storage area, which is the shore-side transfer point for any materials which are transported to and from Platform Gina and Platform Gilda. This plan also incorporates mitigation, prevention, and abatement procedures to be utilized in the case of an emergency.

Additionally, UNOCAL has a Spill Prevention Control and Countermeasure Plan (SPCCP), as described in the previous oil spill discussion. In the event of a spill, cleanup of material would be instituted using procedures outlined in the above manuals and plans.

b. Compliance With Coastal Act Policies for Protection from Harzardous Substance Spills

UNOCAL has incorporated mitigation measures into the proposed project to minimize the risk of adverse impacts from hazardous liquid spill. Based on review of the evidence, the Commission concludes that although the mitigation measures incorporated into the project reduce the risk of a hazardous substance spill, there still exists the potential for adverse impacts to the marine and coastal reosurces in the event of a spill. Therefore, for purposes

of consistency review, the Commission finds the project, with respect to hazardous substance spill protection, is not consistent with Sections 30230, 30231, 30232, and 30240 of the Coastal Act.

However, as discussed previously, this project is considered to be coastal dependent, and therefore the project may nevertheless be approved if it meets the criteria in Section 30260. The Commission concludes that the spill prevention and containment measures proposed by UNOCAL, in combination with the industry's Clean Sea's spill cooperative, represent the maximum available clean-up capabilities feasibly available at this time. Therefore, for purposes of consistency review, the Commission finds that the project provides maximum feasible mitigation and is consistent with Section 30260. (See Section 11 for discussion of Section 30260.)

7. System Safety

Section 30232 of the CCMP provides for protection against the spillage of crude oil, gas, petroleum products, or hazardous substances in relation to any development or transportation of such materials.

As discussed previously, UNOCAL is proposing to install gas processing facilities on Platform Gina to remove hydrogen sulfide (H₂S) from the gas before it is transported through the pipeline. H₂S gas, in high concentrations in excess of 500 ppm, has the potential to kill humans and animals. The risk exists for an accidental release of gas at both the platform and at Mandalay, thereby risking public welfare in the State's coastal zone. UNOCAL has designed the project to reduce the possibility of such a H₂S gas release.

The gas sweetening facilities on Platform Gina will be capable of treating a gas volume of 3.0 MMSCFD and sweetening from a hydrogen sulfide level of 2,000 ppm to less than 4 ppm. All gas will be sweetened to pipeline specification for hydrogen sulfide before it enters the 6 5/8 inch pipeline for transportation.

UNOCAL has designed a triple redundant H₂S monitoring system to prevent the possibility of an accidental H₂S gas release at either the platform or the Mandalay facility. According to the Risk Assessment Study (Appendix 3 of the DPP Revision) for the project:

...The monitors are designed to continuously monitor the flowing gas stream, and will alarm immediately if the H₂S concentration reaches a level of 2 ppm. This early warning alarm gives the platform operators an opportunity to check and adjust the gas sweetening equipment to reduce the H₂S concentration. If, for any reason, the H₂S level is not controlled properly and the concentration reaches 4 ppm, the H₂S monitors then trigger a shutdown of the gas processing system and gas delivery to Mandalay will cease (page 26). ... A similar monitor is also installed at the Southern California Gas Company pipeline tie-in at Mandalay to provide independent and triple redundant back-up to the platform safety systems. ... In addition to the gas pipeline monitoring,

UNOCAL also has installed a number of atmospheric gas monitors aboard the platform to protect employees and visitors against any leaks which could release H₂S gas into the working environment.

UNOCAL has also prepared a detailed H₂S contingency plan, "Mandalay Contingency Plan for Hydrogen Sulfide and Sulfur Dioxide", which is part of the project description. The risk assessment study identifies the Mandalay facility end of the pipeline as the area that has the highest chance of a gas release. After the risk assessment study was completed the Mandalay hydrogen sulfide contingency plan was modified to incorporate evacuation of the public in the 1,230 foot radius hazard footprint area that could be affected in the event of an accidental H₂S release. The plan is updated periodically with the most recent update April 30, 1990, which was approved by the MMS District Supervisor June 25, 1990.

Although the risk of an H₂S gas release is small, the impacts to human and animal safety would be significant if such an event were to occur. Therefore, the Commission finds the project inconsistent with section 30232 of the Coastal Act.

However, as discussed previously, this project is considered to be coastal dependent, and therefore the project may nevertheless be approved if it meets the criteria in Section 30260. The Commission concludes that the mitigation measures UNOCAL has designed into the gas processing system represent state-of-the-art technology to reduce the risk of an H₂S gas release to the maximum extent feasible. Therefore, for purposes of consistency review, the Commission, finds that the project provides maximum feasible mitigation and is consistent with Section 30260 (see Section 11 for discussion of Section 30260).

8. Geologic Hazards

Section 30253 (1) and (2) state that:

New development shall:

- a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

Section 30262(a) of the Coastal Act state that:

Oil and gas development shall be permitted in accordance with Section 30260, if the following conditions are met:

- a) The development is performed safely and consistent with the geologic conditions of the well site.

Platform Gina is located on OCS-202, approximately 4.5 miles offshore, in Federal waters. A major structural failure, due to a seismic event or an extreme storm event, could have broad-reaching environmental effects, such as an oil spill or a release of toxic material, which could extend to coastal waters. Due to this concern, the Commission has examined structural safety as part of its consistency review.

Unocal has submitted a Seismic Hazard Analysis for Platform Gina (Staal, Gardner & Dunne, Inc, 1990), a Structural Analysis of the Production Deck West Extension for the Temporary Batch Sweetening System (Thomas & Beers, Report #103, 1990) and an analysis of Platform Gina for Gravity, Storm, and Seismic Performance under Anticipated West Hueneme Development Loads (Thomas & Beers Report #102, 1990) to the Commission staff coastal engineer for review. These reports were prepared to consider both the extended life of the platform for gas recovery and the effects of adding new equipment to the existing platform.

Platform Gina was installed in 1980 and was designed then to carry the full gravity load, to withstand an extreme storm event, and to resist a Zone 4 seismic design criteria earthquake loading. The proposed project will add an extension to the platform, increase the equipment on the platform and extend the life of the platform from 18 years (original certification) to 25 years. Due to the changes in platform design, load and life expectancy, the seismic hazard of the area was reevaluated and the revised platform was analyzed again for structural stability under gravity, storm and seismic loadings. According to UNOCAL, "the loading and performance criteria used in the structural feasibility work ... were developed for a total platform seismic life of 40 years. The structural modifications proposed in the DPP were developed to reflect a 40 year life." (September 6, 1991 letter form William Weldon of Unocal to Mr. Thomas Dunaway of Minerals Management Service)

a. Seismicity

Structural analysis by Thomas & Beers (Reports # 102 and 103) analyzed both the temporary facilities and the permanent platform redesign. The major temporary components were the batch sweetener tanks. The structural analysis found that the tops of the 60" diameter tanks should be secured to the drilling deck and the tops of the 36" diameter tanks should be guyed, both to prevent lateral movement. Otherwise, the analysis found that "assuming a 1.75g total vertical acceleration, the platform extension members will be adequate for operating plus seismic loads."

The revised platform was evaluated for response to both a strength level and a ductility level event. The preliminary structural evaluation looked at pile strengths and found that the platform "has adequate structural reserve capacity to support the proposed drilling and production equipment associated with additional reservoir development. As a preliminary analysis, this evaluation did not consider local buckling, punching, etc., and these issues should be considered as part of the final design and equipment placement.

The ductility level event is a rare, intense earthquake, for which the platform is required to have adequate reserve capacity to prevent collapse. The structural analysis found several areas in the platform which would have stress levels above yield for the ductility level event. It found, however, that, "yielding in parts of the structure can be tolerated in an intense seismic event if the platform has adequate structural redundancy." Such examination of the platform for redundancy was not undertaken during the preliminary analysis, but will be critical to analysis of the final design.

The MMS is reviewing the preliminary structural analysis for Platform Gina and will review the final plans once the project can be specified in detail. This final review stage will pinpoint the need for additional bracing, tie downs, structural redundancy or localized strengthening. The preliminary review has not identified any major concerns which cannot be addressed by structural modifications or additions to the existing platform.

b. Gravity Loadings and Storm Events

The review of the stress levels, for the extreme storm load case, "indicated no stresses above the basic allowable for the primary structural members in Platform Gina". The analysis by Thomas & Beers found that "the piles have a comfortable margin (of safety), since the minimum safety factor is 2.08 in compression, and 2.27 for pullout." For gravity loads alone, the largest axial loading will have an ultimate safety factor of 3.35, where a factor of safety of 1 indicated that the structure has just enough design strength to meet the predicted loadings (Thomas & Beers, 1990).

c. Pipeline

The pipeline route will follow the route of the old return water line, from Mandalay Beach to Gina Platform. There are a number of faults in the vicinity of the pipeline; however, the pipeline route will not cross any major faults. The closest known fault is the Oak Ridge fault which is north of and somewhat perpendicular to the pipeline route. As stated in the discussion of the platform, "it is likely that there are buried faults in the Transverse Ranges province that presently have not been recognized" (Staal, Gardner & Dunne, 1990).

With regards to the structural safety of the water return pipeline to be able to transport gas, UNOCAL asserts the pipeline has been designed for gas transport:

Original pipeline documentation, such as EIR-8-19, and the original pipeline design refers to the 6 5/8 inch pipeline as a "water pipeline." [However], the pipeline was built to the same standards as the adjacent 10 5/8 inch oil pipeline, and the three Gilda pipelines, one of which is a gas pipeline. The proposed change is consistent with the original design. (DPP Revision, pg. 26).

... The original pipeline installation was designed in accordance with the standards found in Title 49 CFR Part 192 from the Code of the U.S. Department of Transportation Regulations and the Minerals Management Service O.C.S. Order #9. These are the standards which apply to the transmission of gas through pipelines. The 1985 repair was conducted to these standards, and the proposed repair and conversion plan is designed to meet these same standards.

d. Compliance with Coastal Act Policies on Geologic Hazards

The Commission's review of the Seismic hazard and structural studies have revealed no major geologic or structural hazards that would preclude the gas pipeline or modification of the platform for gas facilities. Therefore the Commission finds that the proposed platform and pipeline are consistent with Section 20253 and 30262(a) of the CCMP as they relate to geologic hazards.

9. Consolidation of Facilities

Sections 30250(a) and 30262(b) of the Coastal Act provide for the consolidation of facilities to the maximum extent feasible.

UNOCAL proposes to add new gas sweetening facilities on existing Platform Gina in order to allow for the exploration and development of additional gas reserves. A minor deck expansion will be built at the time of the permanent gas facility installation. However, UNOCAL does not propose to build any new pipelines for the transport of gas. Instead, they propose to convert the existing water return pipeline to gas sales service.

As a condition of the previous Coastal Development Permit issued in 1981, UNOCAL had agreed to allow commingling of a third party's oil or gas into the pipeline, if asked by a nother party. That condition has been incorporated into this permit.

The Commission concludes the project allows for consolidation to the maximum extent feasible and legally permissable. Therefore, for purposes of permit and consistency review, the Commission finds the project consistent with the requirements of Sections 30250(a) and 30262(b) of the Coastal Act, with respect to consolidation of facilities.

10. Cumulative Impacts

The Coastal Commission is required by the Coastal Act to evaluate the cumulative impacts of proposed development, including offshore oil and gas development. The Commission has expressed its concerns about cumulative impacts of energy development during oil and gas lease sales and during the review of exploration and production plans on the OCS and in state waters.

Section 30250(a)(b) of the CCMP provides, in part, that:

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. ...

(b) Where feasible, new hazardous industrial development shall be located away from existing developed areas.

Section 30105.5 defines the terms "cumulatively" or cumulative effect":

Cumulatively or cumulative effect means the incremental effects of an individual project shall be reviewed in connection with the effects of other current projects, and the effects of probable future projects.

The proposed project seeks to locate the gas processing facilities offshore, away from existing developed areas, in order to minimize the risks to public health and safety. The proposed project consolidates facilities by using existing pipelines and by adding the gas processing facilities to the existing platform. Expected maximum production from the drilling of the new gas wells will not require any additional facilities to be installed at the platform, beyond the facilities proposed in the current project description.

The drilling of the maximum of seven new wells will generate additional drilling muds and drilling fluids. The discharge methods, effluent limitations, and monitoring required by the approved NPDES Permit reduce the project's level of individual and cumulative impact on the resources in the coastal zone. Nonetheless, based on the evidence (discussed in Section 3), the Commission concludes there exists the risk for cumulative adverse impacts on the water quality, habitat, and fisheries of the coastal zone.

The gas processing facilities and flaring operations will generate additional NO_x , ROC, and SO_2 emissions which will have a cumulative adverse effect on the air quality in the Ventura County air basin. However, as discussed previously in Section 1, UNOCAL has agreed to the mitigation measures recommended by Ventura County APCD, which will mitigate the cumulative long term adverse air quality impacts to the maximum extent feasible. Nonetheless, based on the evidence (discussed in Section 1) the Commission concludes the project has the risk for cumulative adverse impacts to the air quality within the State's coastal zone.

Because of the risk of cumulative adverse impacts to marine resources, air quality, and water quality within the state's coastal zone, the Commission finds this project is not consistent with the provisions of Section 30250 (a) of the Coastal Act.

However, as discussed previously, this project is considered to be coastal dependent, and therefore the project may nevertheless be approved if it meets the criteria in Section 30260. As discussed in Sections 1 and 3, the Commission has concluded that this project provides mitigation to the maximum extent feasible for impacts to the coastal zone from excess air emissions and from mud and produced water discharges. Therefore, for purposes of permit and consistency review, the Commission finds this project provides maximum feasible mitigation and is consistent with Section 30260. (See section 11 for discussion of Section 30260.)

11. Compliance with Coastal Act Section 30260

The Coastal Act provides:

Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if (1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would adversely affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.

If the Commission determines that a coastal dependent industrial facility, such as an offshore oil and gas development, is inconsistent with specific Chapter 3 Coastal Act policies, it has the discretion whether to invoke its authority to permit a project under the "override" provisions of section 30260. Where the Commission decides to do so, it must make affirmative findings with respect to the three criteria contained in that section, and the criteria in sections 30261 and 30262.

Consequently, section 30260 provides special criteria for coastal dependent oil and gas facilities which have satisfied the requirements of Sections 30261 and 30262 but have failed to satisfy the other Chapter 3 policies. Therefore, the proposed Platform Gina project must be found to be in conformity with the requirements of Sections 30261 and 30262 before the overriding consideration provided in Section 30260 can apply.

In this case, the proposed project before the Commission does not involve the use of tanker facilities or liquefied natural gas terminals so the Commission finds that Coastal Act Section 30261 is not applicable to the proposed project. With respect to Section 30262 of the Coastal Act, the Commission finds the project consistent with the applicable provisions of that section, as discussed previously in this report in sections 2,4, and 9.

As indicated above, the proposed project does not meet the requirements of Sections 30230, 30231, 30232, 30240, and 30250. Because the project has satisfied the applicable requirements of Section 30262 of the Coastal Act, the Commission has chosen to evaluate the project under the "override provisions" of Coastal Act Section 30260. The evaluation of the project under the three criteria of Section 30260 is provided below:

a. Alternative Locations

The Commission is required under section 30260(1) to determine if alternative locations are infeasible or could result in worse environmental damages. The

Commission has evaluated the location of the proposal to determine if impacts from the project could be reduced. The Commission has had the benefit of information provided by UNOCAL to use for this investigation.

UNOCAL examined several other alternatives for this project:

- 1) Lay a new pipeline and transport sour gas to Platform Gilda for processing at the existing amine plant.
- 2) Transport the sour gas to Mandalay in the converted pipeline and sweeten the gas for sales at Mandalay.
- 3) Build a separate satellite platform next to Platform Gina for processing facilities.

The information examined by the Commission indicates that neither building new facilities nor sweetening the gas onshore would result in a reduction of impacts. Therefore, the Commission concludes that the proposal to replace 3,000 feet of existing pipeline and to add facilities to the existing platform is less environmentally damaging than the above alternatives.

b. Public Welfare

Section 30260(2) specifies that in order to approve a project the Commission must find that "to do otherwise would adversely affect the public welfare." This condition requires more than a finding that, on balance, a project as proposed is in the interests of the public. It requires that the Commission find that there would be a detriment to the public welfare were the Commission to disapprove or object to a proposal. In addition, the Commission has to find that the effect on the public, which would result from its disapproval, is outweighed by its effects on the coastal environment. Finally, this section raises the question of whether environmental effects may feasibly be mitigated while preserving any national interest benefits of a project.

In evaluating these public welfare provisions the Commission observes that UNOCAL's proposed project would occur in an area that has previously experienced offshore oil production. Consequently, the Commission finds that there is less risk to public health and safety from the processing of the sour gas (hydrogen sulfide) by locating the gas sweetening facilities on the existing platform, located 4.5 miles offshore, than by transporting the sour gas to shore for processing at the Mandalay facility or at a different facility. The Commission also finds that a denial of the project would have a greater adverse impact on the public welfare due to the loss of additional natural gas which is a cleaner source of fuel for electricity generation than oil, as well as the loss of revenues from the gas production. Moreover, because environmental impacts have been mitigated to the maximum extent feasible as documented in the previous sections of this report, the Commission finds that the proposed project is better for public welfare than the onshore alternatives or than denying it. Therefore, the Commission finds the proposed project meets the specific public welfare findings required by Section 30260(2).

c. Mitigation to the Maximum Extent Feasible

The project's gas processing operation will generate unavoidable adverse cumulative impacts to the onshore air quality. There will be unavoidable impacts to the State's marine and coastal resources from construction activities. There is the risk of significant impacts to marine resources and sensitive habitats from the accidental spill of oil or the chemicals or by-products of the gas sweetening process. And, the risk exists for significant impacts to public health and safety from the processing of the sour gas.

However, as discussed in the previous sections, UNOCAL has incorporated preventive measures and mitigation measures into the project to avoid or minimize these adverse impacts to the maximum extent feasible. The preventive and mitigation measures for reducing the risk of an oil or a hazardous waste spill, and for reducing the risk of an H₂S gas release represent the state-of-the-art technology and spill containment methods available today. The BACT equipment for the permanent gas processing facilities will represent the state-of-the-art technology according to Ventura County APCD standards at the time the equipment is to be installed, approximately two years from now. Therefore, the Commission concludes UNOCAL has provided mitigation to the maximum extent feasible.

12. California Environmental Quality Act

Provisions of the California Environmental Quality Act (CEQA) and its implementing regulations (CEQA Guidelines) to which the Commission is subject, mandate consideration of the cumulative impacts of a proposed development. Section 13096(a) of the Commission's regulations requires that the Commission's action on a permit application be supported "by written conclusions about the consistency of the application with Public Resources Code, section 21000 and following ..." i.e., with the provisions of CEQA. The Secretary of the Resources Agency has certified the Commission's program of reviewing permit applications under section 21080.5 of CEQA. Although this certification exempts the Commission from the obligation to prepare an Environmental Impact Report in connection with its permit actions, the Commission remains subject to CEQA's substantive standards of environmental review.

Section 13096(a) of the Commission's administrative regulations requires Commission approval of a Coastal Development Permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of CEQA. Section 21080.5(d)(2)(i) of CEQA's prohibits a proposed development from being approved:

if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

Previous sections of these findings contain extensive documentation of the significant adverse cumulative impacts the development as proposed would have on the environment. The mitigation measures embodied in the conditions to which the Commission has made its approval subject are available. For the reasons set forth previously in these findings, such mitigation measures are necessary in order to substantially lessen the documented impacts. No showing has been made that any of the conditions is not feasible. Therefore, only as conditioned in the manner set forth previously in these findings may this development proposal be found consistent with applicable requirements of CEQA.

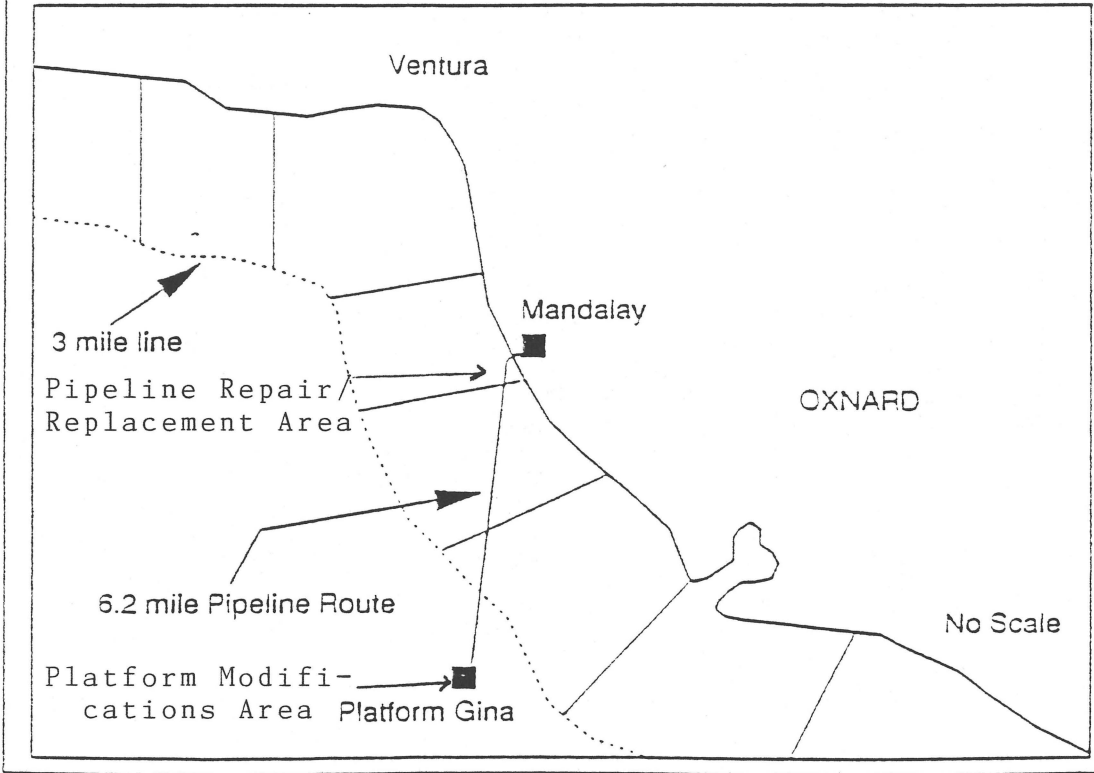
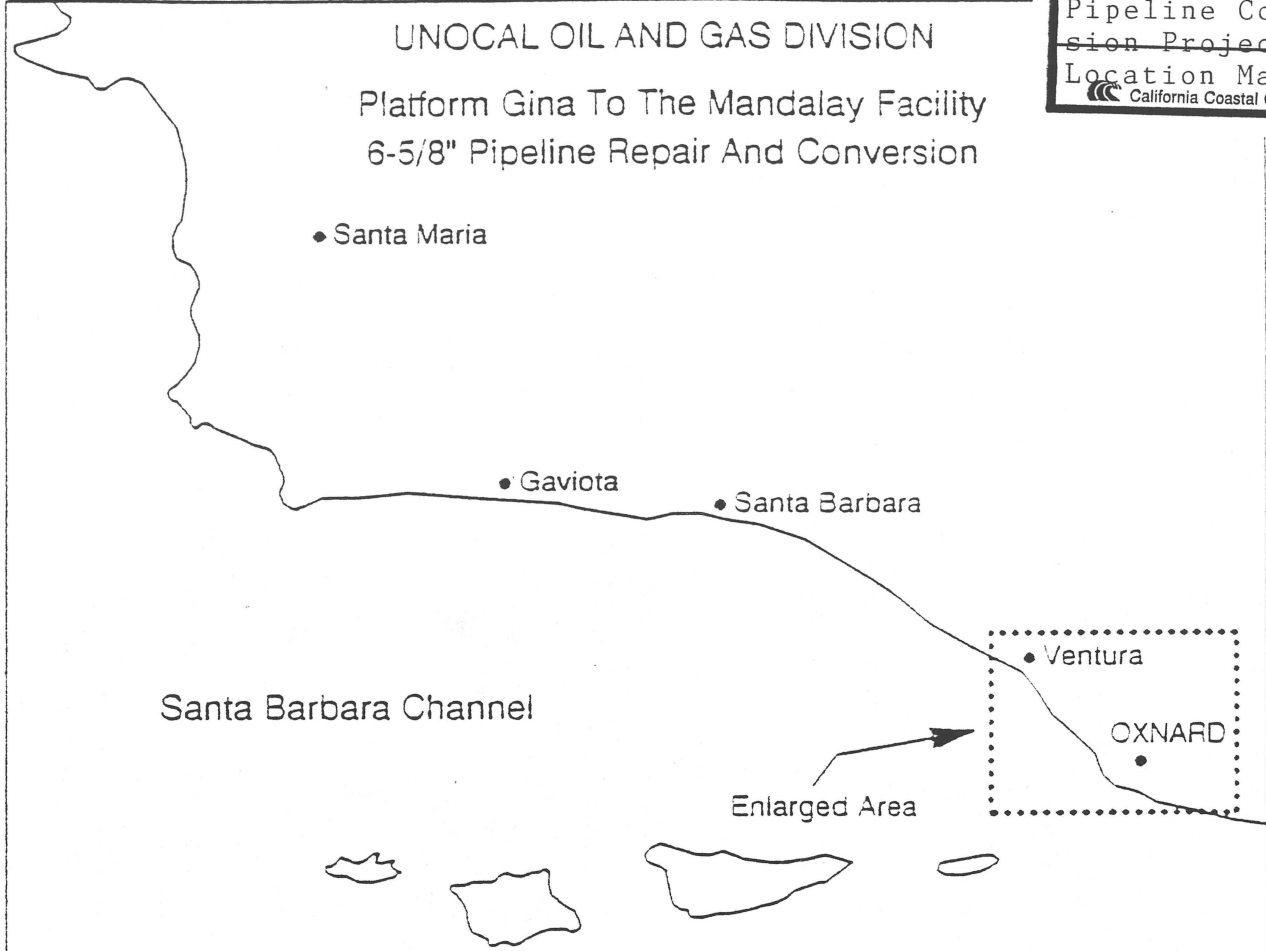
13. Conclusion

In conclusion, for purposes of the permit and consistency review, the Commission finds the proposed Platform Gina project activities are inconsistent, in part, with the applicable Chapter 3 policies of the Coastal Act. However, the Commission also finds that the proposed project activities are coastal dependent oil and gas development activities. Further, the Commission finds that the proposed project has satisfied the applicable criteria of Coastal Act Sections 30261 and 30262, and has satisfied all the criteria of Coastal Act Section 30260.

For this project, the Commission has chosen to use the special "override considerations" provided for coastal dependent oil and gas projects under the provisions of Section 30260 of the Coastal Act, in accordance with Sections 30261 and 30262. Therefore, under the provisions of Coastal Act Section 30260, the Commission concurs with the Consistency Certification made by UNOCAL for the proposed project described its Platform Gina DPP Revision. In addition, under the provisions of the Coastal Act Section 30260, the Commission grants a permit, subject to special conditions, for that portion of the project located in state waters and lands.

STATE & FEDERAL
BOUNDARIES OF
PLATFORM GINA PROJECT

EXHIBIT NO. iA
APPLICATION NO.
Platform Gina
Pipeline Conversion Project
Location Map
California Coastal Commission

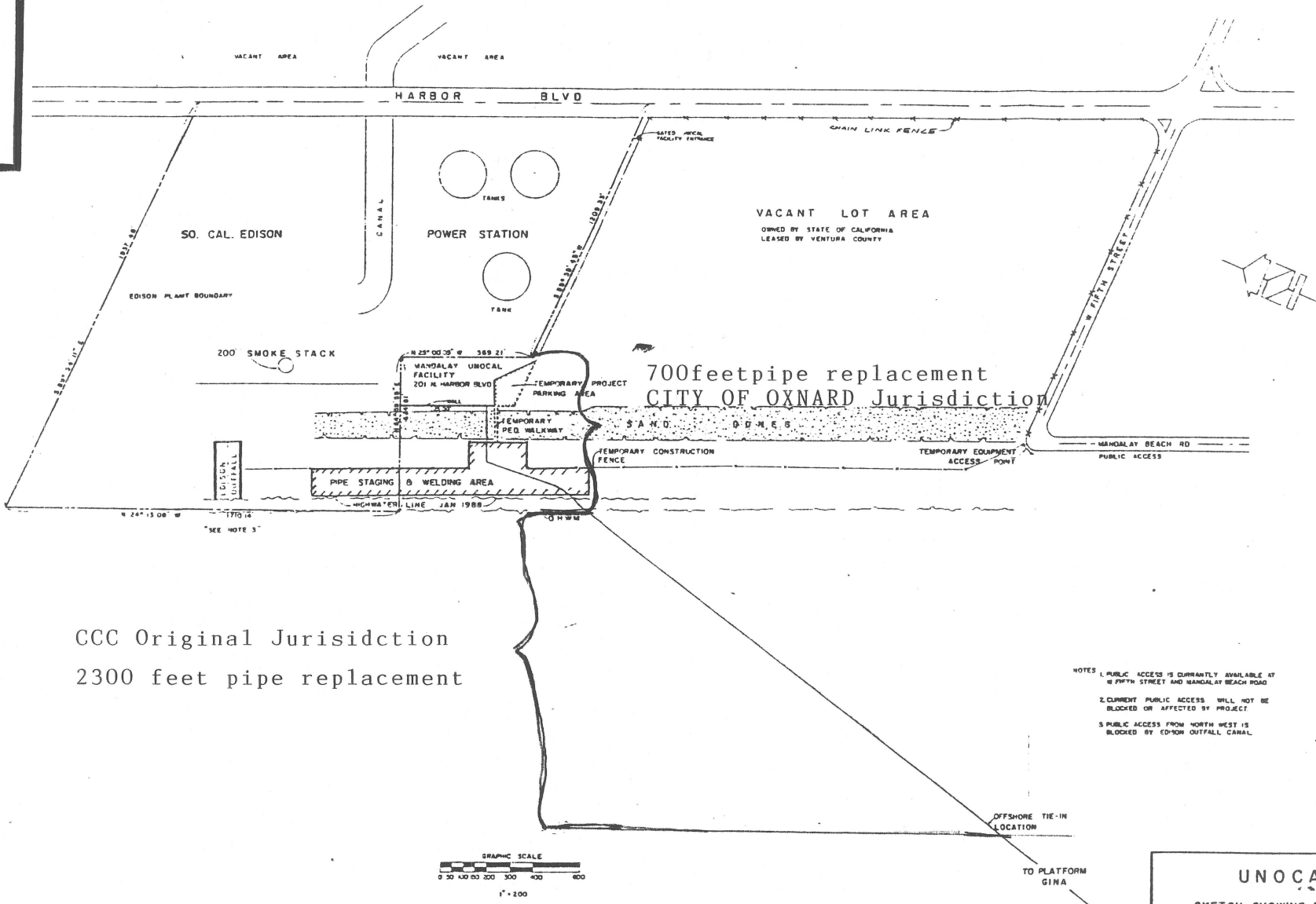


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EXHIBIT NO. 1B

APPLICATION NO.
Platform Gina

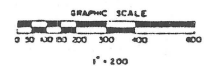
Pipeline Conversion
Location Map



CCC Original Jurisdiction
2300 foot pipe replacement

700foot pipe replacement
CITY OF OXNARD Jurisdiction

- NOTES
- 1. PUBLIC ACCESS IS CURRENTLY AVAILABLE AT 1/2 FIFTH STREET AND MANDALAY BEACH ROAD
 - 2. CURRENT PUBLIC ACCESS WILL NOT BE BLOCKED OR AFFECTED BY PROJECT
 - 3. PUBLIC ACCESS FROM NORTH WEST IS BLOCKED BY EDISON OUTFALL CANAL



UNOCAL
 SKETCH SHOWING PROPOSED
 PIPE STAGING & WELDING AREA
 AND MANDALAY FACILITIES
 VENTURA, COUNTY CALIFORNIA
 OCTOBER 1990 SCALE 1" = 200'

LSS LAND & SEA SURVEYS, INC.
 2204 PISCATAWAY ROAD, SUITE A
 VENTURA, CA 93023 TEL: 688-0066

APPENDIX A
SUBSTANTIVE FILE DOCUMENT

APPENDIX A

SUBSTANTIVE FILE DOCUMENTS

CALIFORNIA COASTAL COMMISSION

- o Letter to William Weldon, UNOCAL Corporation, from Robin Blanchfield; regarding Platform Gina Pipeline Conversion Project Issues, July 24, 1991. ?
- o Letter to Thomas Dunaway, Minerals Management Service from Susan Hansch; regarding Preliminary List of Issues on Platform Gina DPP Revision, Pipeline Conversion Project, August 8, 1991 . ✓
- o Letter to Thomas Dunaway, Minerals Management Service, from Robin Blanchfield; regarding UNOCAL Platform Gina Pipeline Conversion Project, September 30, 1991. ?
- o Letter to William Weldon, UNOCAL Corporation from Robin Blanchfield; regarding formal filing of Permit Application, November 25, 1991. ✓
- o Previous Permit Approval: Coastal Development Permit 216-06, granted by South Central Coast Regional Commission, May 8, 1991. ?
- o Previous Consistency Certification: Consistency Certification CC-6-79, California Coastal Commission concurred, November 6, 1979.

UNOCAL

- o Platform Gina, Point Hueneme Unit (West Hueneme Field) -- Development and Production Plan (DPP) Revision, including:

Appendix 1

- Item A Gas Analysis
- Item B Pipeline Drawings
- Item C Environmental Assessment
- Item D Pipeline Design
- Item E Pipeline Repair Procedures

Appendix 2

- Item A Pipeline Inspections

Appendix 3 -- Final Initial Study

- Initial Study Component 1 -- Return Water Line Replacement
- Initial Study Component 2 -- Conversion to Produced Gas
- Comments Received on May 1990 Draft Initial Study
- Response to Comments
- Exhibit A -- UNOCAL Project Description (December 1989).....Pages 1-32
 - June 26, 1989, memo re: Abandonment of 6-5/8" pipeline... 33-36
 - July 18, 1989, memo re: Procedures/equipment..... 37-38
 - Platform Gina Contingency Plan
 - for Hydrogen Sulfide and Sulfur Dioxide..... 39-58

Exhibit B -- City of Oxnard letter of November 18, 1988, granting approval of pipeline replacement and staging area pursuant to Coastal Development Permit No. 85-5 and Resolution 6218 approving Special Use Permit No. 806.

Exhibit C -- Original Project Description evaluated in EIR/EA 78-19

Exhibit D -- Emission Data for Platform Gina Pipeline Repair and Conversion Project, February 1990

Letter of April 9, 1990, from the Ventura County Air Pollution Control District concerning the proposed project.

Exhibit E -- Risk Assessment Study, Platform Gina Gas Production and Pipeline, Mandalay Onshore Receiving, November 1989

Appendix A

Subsequent State Lands Commission October 18, 1990, letter of comment.

Subsequent UNOCAL October 24, 1990, letter of response.

Appendix 4

Self-Burial Study

Appendix 5

Structural Information

Appendix 6 -- Proprietary

Drawings

Appendix 7 -- Proprietary

Geological Drawings

- ? o Risk Assessment Study, Platform Gina Gas Production and Pipeline, Mandalay Onshore Receiving Facility; by EnerSource Engineering, November 21, 1989.
- ? o Mandalay Contingency Plan for Hydrogen Sulfide and Sulfur Dioxide, April 30, 1990.
- ? o Draft Initial Study for Platform Gina Proposed Return Water Line Replacement and Conversion to Produced Gas; by City of Oxnard Community Development Department with the assistance of Carol Waldrop & Associates, May 1990.
- ✓ o Permit Application E-91-3 for Platform Gina Offshore California Pipeline Repair and Conversion (002092), November 11, 1991.
13
- o Environmental Impact Report (EIR 78-19) and Environmental Assessment: Platform Gina and Gilda Projects, Volume I, II, and III, May 8, 1980.

- o Letter to Melinda Mayes, Minerals Management Service from William Weldon; responses to Ventura County APCD and Santa Barbara County APCD comments concerning air emissions, November 21, 1991. ✓
- o Letter to Thomas Dunaway, Minerals Management Service, from William Weldon; response to Coastal Commission issues contained in August 8, 1991 letter, September 6, 1991. ✓
- o Letter to Thomas Dunaway, Minerals Management Service, from William Weldon; regarding incorporation of additional mitigation measures to satisfy Coastal Commission and Ventura County APCD concerns into Platform Gina DPP Revision Project Description, December 17, 1991. ✓
- o Letter to Robin Blanchfield, CCC, from William Weldon; response to issues and agreement to mitigation, November 14, 1991. ✓

MINERALS MANAGEMENT SERVICE

- o Letter to Susan Hansch, California Coastal Commission, from Thomas W. Dunaway; regarding California Coastal Commission and UNOCAL Meeting which discussed DPP Revisions for Platform Gina, July 30, 1991. ✓
- o Letter to Susan Hansch, California Coastal Commission, from Thomas W. Dunaway; regarding Platform Gina DPP Plan, September 27, 1991. ✓
- o Draft Information Meeting Summary for UNOCAL Revised DPP for Platform Gina, October 31, 1991.

AIR POLLUTION CONTROL DISTRICT (APCD)

1. Ventura County APCD

- o Letter to Susan Hansch, California Coastal Commission, from Richard Baldwin; comments on Platform Gina Project Air Emissions, November 15, 1991.
- o Letter to Susan Hansch, California Coastal Commission, from Richard Baldwin; Recommendations for Mitigation Measures to Bring Platform Gina Project into compliance with onshore air rules, November 19, 1991.
- o Letter to Ralph Steele, City of Oxnard from Bill Mount; comment on Initial Study and Air Emission, April 9, 1990.

2. Santa Barbara Count APCD

- o Letter to Susan Hansch, California Coastal Commission, from James Ryerson; comments on Platform Gina Project Air Emissions, November 21, 1991.
- o Letter to Thomas Dunaway, Minerals Management Service, from James Ryerson; comments on Platform Gina Project air Emissions and Recommendations for Mitigation, December 2, 1991.

OTHER AGENCIES

- o Letter to Chris R. Culver, UNOCAL Corporation from N.S. Porter, U.S. Coast Guard; regarding UNOCAL's Platform Gina Return Water Line Replacement and Conversion Project.
- o Negative Declaration 90-29 by Richard J. Maggio, UNOCAL Corporation; Modification to Special Use Permit No. 806 project.
- o Letter to William W. Weldon, UNOCAL Corporation, from Debbie Townsend, State Lands Commission; regarding Amendment of General Lease -- Industrial Use PRC 5967.1, October 10, 1991.
- o Letter to Ralph Steele, City of Oxnard, from Bill Mount, County of Ventura APCD; regarding EIR 78-10 (Platform Gina and Platform Gilda Project), April 9, 1990 .
- o Draft California State Lands Commission Mitigation Monitoring and Reporting Plan for the Platform Gina Proposed Return Water Line Replacement and Conversion to Produced Gas Project.
- o Letter to Thomas Dunaway, Minerals Management Service, from Thomas Berg, Ventura County Resource Management Agency; comments on Project, November 27, 1991.
- o Letter to Thomas Dunaway, Minerals Management Service, from Peter Bontadelli, California Department of Fish and Game comments (draft); comments on Project; November 26, 1991.
- o Memo to Doug Anthony, Santa Barbara County, from Collin Fallat, Santa Barbara County; comments on Project, October 30, 1991.
- o Letter to Thomas Dunaway, MMS, from James Strock, California Environmental Protection Agency; state agency comments on Project, December 2, 1991.
- o Memo to Michael Kahoe, California Environmental Protection Agency, from Don Maughn, State Water Resources Control Board; comments on Project, November 20, 1991.

APPENDIX B
STANDARD CONDITIONS FOR
APPROVED PERMITS

APPENDIX B
STANDARD CONDITIONS FOR
APPROVED PERMITS

Below are standard conditions of approved permits that have been routinely applied by the Coastal Commission pursuant to its regulations. These conditions are required on all administrative, consent calendar, and regular hearing approved permits.

STANDARD CONDITIONS

1. Notice of Receipt and Acknowledgement. The permit is not valid and construction shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If construction has not commenced, the permit will expire two years from the date on which the Commission voted on the application, or in the case of administrative permits, the date on which the permit is reported to the Commission. Construction shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All construction must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director of the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

APPENDIX C
DEVELOPMENT AND PRODUCTION
PLAN TIMELINE

APPENDIX C

<p style="text-align: center;">TABLE 1 Development and Production Plan Timeline West Hueneme Field</p>	
Month	Action
0	Obtain the permit to repair the pipeline.
1	Mobilize construction equipment to repair line.
2	Repair pipeline. Mobilize rig on Platform Gina.
3	Test and complete Well No. H-14 in Monterey. Install temporary facilities to sweeten gas on Platform Gina.
4	Place Well No. H-14 on production at an estimated 3 MMCFD rate.
5	Evaluate Well No. H-14 performance.
6	Initiate permanent facility design.
8	Formalize cantilever size for additional processing equipment.
9	Begin third-party verification for cantilever design and slot addition.
10	Submit structural modifications to MMS.
11	Finalize permanent sweetening facility design.
12	Complete specifications for permanent sweetening facility.
13	Issue bid packages for facility.
14	Order equipment for permanent facility.
20-22	Install permanent sweetening facility.
22	Mobilize drilling rig.
23-25	Drill Well 1.
26-28	Drill Well 4.
29-31	Drill Well 7.
32-44	Monitor Monterey performance from Wells H-14, 1, 4, and 7.
45-47	Drill Well 2.
48-50	Drill Well 6.
51-53	Drill Well 5.
54-56	Drill Well 3.
57	Recomplete Well H-9 in Monterey.
58	Recomplete Well H-10 in Monterey.
?	Recomplete Wells H-14, 1, 4, and 6 in Sespe when Monterey is depleted in each individual well.

NOTE: It is also possible that Well 1 may be drilled and tested after Month 5 to confirm permanent facility design prior to permanent facility installation.

APPENDIX D
CITY OF OXNARD
APPROVAL AND CONDITIONS

APPENDIX D

RESOLUTION NO. 6218

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF OXNARD APPROVING SPECIAL USE PERMIT NO. 806, APPLIED FOR BY UNION OIL COMPANY OF CALIFORNIA, TO PERMIT AN ONSHORE TREATING FACILITY, ASSOCIATED PIPELINES, AND A PIPE FABRICATION AREA, SUBJECT TO CERTAIN CONDITIONS.

WHEREAS, the Planning Commission of the City of Oxnard has considered an application for an onshore treating facility, associated pipelines, and a pipe fabricating area, filed by Union Oil Company, in accordance with Section 34-146 through 34-157.1 of the Oxnard City Code; and

WHEREAS, the Planning Commission, having previously considered the Environmental Impact Report (E-78-19) prepared for the project, has found it adequate; and

WHEREAS, the Commission finds that, after due study, deliberation and public hearing, the following circumstances exist:

1. The proposed use is in conformance with the General Plan, Local Coastal Plan (including Policy 40, which provides that the facility may be located in the least environmentally damaging site of the three alternative sites evaluated in the EIR), and other adopted standards of the City of Oxnard.
2. Applicable mitigation measures that are recommended in Section 5 of the EIR have been attached to this permit to reduce the potential for adverse impacts during construction and operation. Therefore, no significant unavoidable adverse impacts are expected to occur within the jurisdiction of the City of Oxnard.
3. The proposed use will not adversely affect or be materially detrimental to the adjacent uses, buildings or structures or to the public health, safety or general welfare.
4. The site for the proposed use is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other items as required.
5. The site for the proposed use will be served by streets and highways adequate in width and structure to carry the kind and quantity of traffic such use will generate.

6. The site for the proposed use will be provided with adequate sewerage, water, fire protection and storm drainage facilities.

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission of the City of Oxnard hereby approves said special use permit, subject to the following conditions. The decision of the Planning Commission is final unless appealed in accordance with the provisions of Section 34-155 of the Oxnard City Code.

GENERAL CONDITIONS

1. The special use permit is granted for the land as described in the application, shown as Exhibit "A" (Tentative Parcel Map), and including Exhibits "B" (Proposed Lease Parcel), "C" (Plot Plan), "D" (Elevations), "E" (Signing), and "F" (Materials Board), and shall not be transferable from one property to another.
2. The special use permit shall become null and void within twelve months from the date of its issuance, unless the proposed development or use has been diligently pursued. The issuance of a grading, foundation, or building permit for structural construction shall be the minimum requirement for evidence of diligent pursuit.
3. The special use permit is granted subject to the approval of a zone change application.
4. The special use permit shall be granted subject to the approval of a tentative and final parcel map and recordation of said map. Building permits shall be issued only after map recordation. All conditions of the required parcel map shall be complied with prior to occupancy of the use applied for in this permit.
5. Any covenants, conditions and restrictions shall be subject to the review and approval of the City Attorney and the Planning Director.
6. All conditions of this special use permit shall be complied with prior to the approval of occupancy, unless occupancy is approved by the Planning Director or Planning Commission.

7. As a condition of approval of this permit, the developer agrees to defend, at his sole expense, any action brought against the City based upon approval or use of this permit or, in the alternative, to relinquish this permit. The developer shall reimburse the City for any court costs and attorney's fees which the City may be required to pay as a result of any such action. The City may, at its sole discretion, participate in the defense of any such action, but such participation shall not relieve the permittee of the obligations under this condition.

Commencement of construction of operations under this permit shall be deemed to be acceptance by the developer of all the conditions of this permit.

8. As a condition precedent to any building permit being issued by the City, the developer shall file for, or cause to be filed, an annexation of the subject 1.8 acre parcel to the Calleguas Municipal Water District and the Metropolitan Water District.
9. The location of buildings and structures shall conform substantially to the plot plan submitted, labeled Exhibit "C", except as amended at the time of approval.
10. The elevations of all buildings shall be substantially in conformance with the elevation plan submitted as part of Exhibit "D", except as amended at the time of approval.
11. The final design of buildings and masonry walls, including materials and colors, shown in Exhibits "D", "E" and "F", is subject to the approval of the Planning Director.
12. Any minor changes or minor increase in the extent of use or size of structures may be approved by the Planning Director, but any substantial change or increase will require the filing and approval of a major modification or an amended special use permit by the Planning Commission. Any request for minor modification shall be made to the Planning Director in writing and shall be accompanied by three copies of any plans reflecting the requested modification. Any subsequent modification of the development plans initially approved by the Planning Commission shall be designed to minimize impacts on the visual resources of the area. (LCP, #15)

UTILITIES

13. No exterior refuse storage or pick-up facilities are permitted.
14. On-site and adjacent offsite utility service shall be installed underground in accordance with adopted City Council Ordinance and Policies.

PARKING AND ACCESS

15. Offstreet parking, including number of spaces, stall size, paving, striping, location and access, shall comply with Sections 34-5 and 34-6 of the Oxnard City Code.

SIGNS AND APPURTENANT STRUCTURES

16. Building signs corresponding to Exhibit "E" may be approved by the Planning Department. Sign area, size and location shall be in accordance with sign regulations of the M-2 zone, as established by the Oxnard City Code. The applicant shall submit color scheme information with any request for change of copy.
17. On-site lighting, if provided, shall be shielded from abutting properties so as to produce no nuisance or annoyance. No lighting shall be of the type or in a location such that it constitutes a hazard to vehicular traffic, either on private property or on abutting streets. The spacing and height of the standards and luminars shall be such that a maximum of seven foot candles and a minimum of one foot candle of illumination are obtained on all vehicle access ways and parking areas. The height of light standards shall not exceed twenty feet above the finished interior base pad elevation. To prevent damage from automobiles, standards shall be mounted on reinforced concrete pedestals or otherwise protected. Lighting elements shall be placed in such a manner as not to direct light onto the adjacent park area.
18. All open storage of materials shall be located as shown in Exhibit "C". Open storage areas shall be screened from adjacent properties and streets by construction of a wall, fencing or screening. All fence or wall materials shall match major design and materials elements of the main structure.

FIRE SAFETY CONDITIONS

19. Onsite and/or boundary water mains, fire hydrants, and services shall be designed and installed to Fire Department and Water Service Division specifications.
20. Adequate fire protection, as determined by the Fire Chief, shall be available prior to the issuance of any building permit. The developer, prior to the start of construction, shall present a plan to the Fire Chief designed to insure the integrity of providing both fire equipment access and water for fire combat operations to all areas of captioned property. Such plan shall meet the approval of the Fire Chief. All vehicle access driveways will be 25 feet in width, and will be striped and signed to Fire Lane Standards.
21. A comprehensive plan pertaining to the treatment facility and associated pipelines within the City for fire suppression, prevention of explosion, and prevention of the escape of hazardous gases (i.e., hydrogen sulfide, etc.) shall be submitted to and approved by the Fire Chief prior to starting construction of either the treatment facility or pipeline. A comprehensive plan of the onsite fire suppression system shall be designed by a qualified fire prevention engineering firm or engineer.
22. No burning of combustible refuse on the subject property is permitted.
23. A permit shall be obtained from the Oxnard Fire Department for the handling, storage and use of all flammable, combustible and hazardous materials.
24. All flammable liquid installations shall be in conformance with Standard No. 30, "Flammable and Combustible Liquids Code", 1979 edition, of the National Fire Protection Association.
25. Three copies of prints showing the proposed equipment and material delivery routes shall be approved, and a moving permit issued by the City Traffic Engineer, prior to any equipment or material deliveries to the site. The developer shall be responsible for the design and construction of any improvements necessary for the safe and orderly movement of traffic.

26. Oil transmission pipelines will not be allowed to be suspended or in any other way connected to the existing brackets now supporting the City water main on the west side of the Harbor Boulevard bridge at the Edison Canal bridge. The developer shall use alternate means, such as the east side or underside of the bridge. Alternate plans shall be subject to and have prior approval of the Public Works Director.
27. Conditions 27a through 27g are based upon mitigating measures recommended in E-78-19. The numbers in parentheses refer to sections in Volume I of E-89-19. The conditions are as follows:

- a. Mitigation of Potential Effects of Seismic and Hydrologic Phenomena (5.1.1)

A qualified engineer, licensed in the State of California, shall review all project elements (treatment facility and pipeline) proposed for installation, construction, and operation within the City for adequacy of their design related to: maximum creditable earthquake ground motion, liquefaction potential, differential settlement, and erosion. The certification must be submitted to the Department of Building and Safety for review prior to the issuance of a grading or building permit.

- b. Mitigation of Potential Effects on Soil and Water (5.1.2)

1. Wherever disturbance of agricultural or productive soils is necessary, they should be stockpiled and replaced in a manner such that resulting profiles are as similar as is practicable to those which existed prior to the disturbance.

2. Consumptive use of fresh water during hydrostatic testing of onshore pipelines should be minimized by testing the pipelines in sections, if practicable.

- c. Mitigation of Potential Effects on Air Quality (5.2)

1. Water sprays should be used during construction to minimize fugitive dust.

2. The applicant shall certify that the burners specified for installation on the heater treaters are designed to reduce NO emissions to the lowest level practical, and are acceptable to the Ventura County Air Pollution Control District (APCD).
3. Total hydrocarbon (THC) emissions from all vessels shall be controlled by using a vapor recovery and compression system that is not vented to the ambient air.
4. The applicant shall develop, maintain, and implement a program of regular maintenance and inspection of all valves, flanges, and pump and compressor seals to reduce THC emissions to a level that is acceptable to the Ventura County APCD.
5. The applicant shall comply with all conditions and permits issued by the Ventura County APCD.

d. Mitigation of Ambient Noise Levels (5.2.2)

Offshore pipeline-pulling activities should be initiated at 7:00 a.m. early in the week, so that tug and barge operations will be further from shore during the first and subsequent nights and the weekend.

e. Mitigation of Potential Effects on Terrestrial Biology (5.5)

Revegetation associated with restoration of surface conditions after construction activities at the offshore pipeline marshalling and fabrication areas and along the onshore pipeline systems, as well as the onshore treating facility after project termination, shall be dictated by the type and nature of the adjacent vegetation as follows:

1. Fore-dunes and dune scrub habitat should be revegetated with native species or introduced dune stabilizers presently dominating many areas, or left without vegetation on flat strand used intensively for recreation.

2. Agricultural and urban habitat should be revegetated with the appropriate crops or landscape species.
 3. Ruderal habitat should be revegetated with annual or perennial grass or other appropriate cover.
 4. Riparian habitat in the vicinity of the Santa Clara River should be allowed to revegetate naturally.
 5. For projects where a revegetation plan and/or habitat restoration plan has been required, the area crossed by the pipeline shall be resurveyed one year after the completion of construction to determine the effectiveness of the plan. This survey shall continue, on an annual basis, to monitor progress in returning the site to preconstruction conditions until the City has determined that the vegetation restoration is complete.
 6. Herbicides shall not be used during pipeline construction. The sidecasting of soil may be restricted, where the City deems necessary, by removal of excess soil to an approved dumping site after the excavation has been backfilled and compacted. The City may require that the trenches be filled by replacing the soil horizons in sequence.
- f. Mitigation of Potential Effects on Surrounding Land Uses (5.6)
1. Detour lane recommendations listed in Table 5.6-1 of E-73-19 are subject to the review and approval of the Public Works Director before implementation.
 2. The block wall surrounding the treating facility shall be beige, or a color that is compatible with the natural surroundings. The wall shall be regularly maintained to remove graffiti and repair the effects of vandalism. No ornamental landscaping should be introduced on the exterior of the wall, as it would highlight the facility against the natural color of the surrounding dunes.

g. Mitigation of Potential Effects on Cultural Resources
(5.3)

1. Avoidance is the preferred mitigation in all cases where a proposed project element would intrude on the known location of a cultural resource.
 2. A qualified archaeologist shall be present to monitor all subsurface work during treatment facility and onshore pipeline construction.
 3. Should any object of potential cultural significance be encountered during construction of offshore and onshore facilities, a qualified cultural resources consultant should evaluate the find and recommend any further mitigation measures needed to the Planning Director. Upon receipt of this recommendation, the Planning Director may require that subsurface work be stopped in the affected area until a mitigation plan is prepared that is acceptable to the City.
 4. Any buried sites discovered during onshore construction should be excavated by a qualified archaeologist, using professionally accepted methods and techniques, in accordance with an acceptable research design. During such site excavation, a qualified representative of the local descendants of the Chumash Indians should be employed to assist in the study, ensure proper handling of cultural materials, and ensure proper curation or reburial of finds of religious importance or sacred meaning.
 5. Access to permanent facilities construction areas and the offshore pipeline fabrication/marshalling area near the SCE Mandalay Generating Station should be strictly controlled during construction and operation to avoid encroachment on the basket material site located to the southeast.
28. Conditions 23a through 23d are based upon policy recommendations included within the adopted City of Oxnard Local Coastal Plan (LCP). The numbers in parentheses refer to policy sections in the LCP.

- a. Any person developing property within the 100-year flood line shall agree to indemnify, and hold the City harmless, from any liability or damages resulting from the construction of his development. (18)
- b. Because it is not possible to route pipelines around coastal resource areas (extending from the mean high tide line to Harbor Boulevard and designated as habitat, recreational and possibly subsequent archaeological areas), they shall be permitted to cross the areas with the following conditions: (33)
 1. In case of a break, pipeline segments, except for natural gas pipelines, shall be isolated by automatic shut-off valves or with other safety techniques approved by the City, Department of Transportation (DOT), or other appropriate agency. An automatic shutoff valve will be required at the point where the DOT pipeline intersects the Harbor Boulevard right-of-way. If the City determines it is necessary, the valves may be located at intervals less than the maximum required by the DOT.
 2. Any routing of pipelines, other than natural gas pipelines, through resources areas shall be designed to minimize the impacts of a spill, should it occur, by considering spill volumes, durations, and trajectories. Plans for appropriate measures for clean-up shall be submitted with the franchise applications for all pipeline project proposals. This shall include a risk management plan, including oil spill prevention measures and contingency plans, which shall be developed and placed on file with the Public Works, Fire and Police Departments.
 3. All alarm malfunction systems for pipeline pressure drops, breaks, etc., shall be supervised twenty-four hours a day.
 4. Certification shall be presented to the Oxnard Fire Department yearly by an outside, widely recognized testing agency. This certificate will attest to the condition of all lines, valves, storage containers and pressure systems.

5. The portions of the oil and gas pipeline systems that are within the City shall be designed, installed, and operated in accordance with DOT standards, as if the pipelines were under the jurisdiction of the DOT.
- c. Oil processing and shipping facilities shall be consolidated to the maximum extent feasible, as determined by the City. Union Oil shall make space or treatment capacity available to other companies if it is technically feasible to do so after taking into account Union Oil's short and long term needs for the facility. (u2)
- d. Pipelines shall be used to transport all petroleum products produced in the City's Coastal Zone to other areas for further processing. Existing pipelines shall be used, including multi-company use, whenever possible. (u3)
29. Upon completion of production, the oil and gas separation facility area shall be restored to a state approximating its original condition, with respect to topography and vegetation.
30. Sanitary wastes generated during the onshore treatment facility construction, operation and power cable and pipeline installation will be collected in portable chemical toilets. At regular intervals, the contents shall be emptied and trucked to an approved offsite disposal facility by a licensed contractor, and disposed of by methods approved by local regulatory agencies.
31. Any agreement entered into between Union Oil Company and the County of Ventura related to the use of or access to the subject property shall be subject to review and approval by the Oxnard City Council. Union shall request a review of any agreements in effect at the time this permit is issued within thirty days of the date of final approval and, subsequently, thirty days prior to changing any existing agreement or entering into a new agreement.
32. The pipeline fabrication shown in Exhibit "B" and all access routes must be restored to conditions existing before the disturbance (or better) after construction of the pipeline and laying of the pipelines and cables are completed.

33. Permanent surface access to the treatment facility is to be provided by an easement that is contiguous with and parallels the southerly boundary of the generating facility and shall cross the area indicated on Exhibit "A" (tentative parcel map) as Drill Site No. 1, unless this is proven infeasible to the satisfaction of the Planning and Public Works Directors and an acceptable alternative is presented for their approval. No departure from the concept of contiguity is permitted without review and report by the Recreation Director and approval by the Planning Commission.
34. The applicant shall follow the recommendation of the California Department of Fish and Game (E-78-19, Vol. III, P. 22-1), which states: "Onshore and offshore pipeline and power cable placement activities [shall only] be conducted from September through February." This construction timing limitation shall be reflected in any franchise agreement requested by the applicant of the City and adhered to unless the recommendation by the Department of Fish and Game is modified by a written report and approved by the Planning Director.
35. The 1.3 acre treatment facility design pad elevation shall be designed to provide flood proofing from a 100-year level of wave runup.
36. The interrelationships of the sand dune system, beach aggradation and degradation, and the facility, shall be evaluated by a qualified consultant. The findings, conclusions, and recommendations shall be taken into account during the development of the final design specifications for the treatment facility before the final specifications are submitted to the Building and Safety Department for review and approval. A plan for restructuring and revegetating the sand dunes to the west of the facility after completion of construction shall be submitted to the Parks Director for review and approval prior to the Building and Safety Department issuing a building permit for the 1.3 acre treatment facility.
37. A plan for perimeter and internal security shall be developed and submitted to the Police Department for review and approval prior to obtaining an electrical permit from the Building and Safety Department.

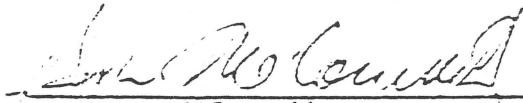
Page 13
Resolution No. 6218

PASSED AND ADOPTED by the Planning Commission of the City of Oxnard on
this 18th of December, 1980, by the following vote:

AYES: Commissioners: Dressler, Duff, Flores, Stoll,
O'Connell


NOES: Commissioners: None

ABSENT: Commissioners: Lopez



John A. O'Connell, Jr., Chairman

ATTEST:



Gene L. Rosford, Secretary

APPENDIX D
RESOLUTION NO. 7519

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF OXNARD APPROVING MODIFICATION TO SPECIAL USE PERMIT NO. 806 APPLIED FOR BY UNOCAL OIL AND GAS DIVISION, POST OFFICE BOX 6176, VENTURA, CALIFORNIA 93003 TO REPAIR A PORTION OF THE 6-5/8" PIPELINE WHICH EXTENDS FROM PLATFORM GINA TO THE MANDALAY SEPARATION FACILITY AND THEN CONVERT THE USE OF THE PIPELINE FROM RETURN WATER SERVICE TO PRODUCED GAS TRANSPORT SERVICE. THE PIPE STAGING AND WELDING AREA IS NORTH OF THE ORIGINAL PIPELINE, TOWARD THE EDISON OUTFALL CANAL ON THE WEST SIDE OF THE SOUTHERN CALIFORNIA EDISON COMPANY MANDALAY FACILITY SITE, IN THE EC (COASTAL ENERGY FACILITY) ZONE, SUBJECT TO CERTAIN CONDITIONS.

WHEREAS, the Planning Commission of the City of Oxnard has considered an application for a modification to Special Use Permit No. 806, filed by Unocal Oil and Gas Division in accordance with Section 34-146 through 34-157.1 of the Oxnard City Code; and

WHEREAS, the Planning Commission finds that, after due study, deliberation and public hearing, the following circumstances exist:

1. That the proposed use is in conformance with the General Plan and other adopted policies of the City of Oxnard.
2. That the proposed use will not adversely affect or be materially detrimental to the adjacent uses, buildings or structures or to the public health, safety or general welfare.
3. That the site for the proposed use is adequate in size and shape to accommodate the setbacks, parking, landscaping, and other City standards except as may be specifically excepted by the special findings and conditions of this resolution.
4. That the site for the proposed use will be served by streets and highways adequate in width and structure to carry the kind and quantity of traffic such use will generate.
5. That the site for the proposed use will be provided with adequate sewerage, water, fire protection and storm drainage facilities.

WHEREAS, in accordance with the California Environmental Quality Act the Community Development Director has provided public notice of the intent of the City to adopt a negative declaration for this project and the Planning Commission has reviewed the initial study and staff report and hereby finds that this project will not have a significant effect on the environment and adopts said negative declaration; and

WHEREAS, the Planning Commission finds that the applicant agrees with the necessity of and accepts all elements, requirements, and conditions of this resolution as being a reasonable manner of preserving, protecting, providing for, and fostering the health, safety, and welfare of the citizenry in general and the persons who work, visit or live in this development in particular.

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission of the City of Oxnard hereby approves modification to Special Use Permit No. 806, subject to the following conditions:

1. The applicant shall comply with the intent and requirements of the City of Oxnard's letter of authorization extending the applicability of Coastal Development Permit No. 85-5 dated November 18, 1988, the conditions included in Coastal Development Permit No. 85-5, and Resolution No. 6218 approving Special Use Permit No. 806, plus references and all documents referred to in each such document.
2. Gas production from Platform Gina, pipeline repair, replacement, and conversion to produced gas transport service and the onshore receiving shall be in compliance with the procedures outlined in the Unocal Project Description (Platform Gina to the Mandalay Facility 6-5/8 Pipeline Repair and Conversion, Revision 1, prepared by Unocal Oil and Gas Division, December 1989) included as Exhibit A to the Initial Study and as described in the Risk Assessment Study, Platform Gina Gas Production and Pipeline Mandalay Onshore Receiving, prepared by EnerSource Engineering, November 21, 1989.
3. The hydrogen sulfide redundant monitoring, detection, shutdown and alarm system shall be implemented as described in the Unocal Project Description (Platform Gina to the Mandalay Facility 6-5/8 Pipeline Repair and Conversion, Revision 1, prepared by Unocal Oil and Gas Division, December 1989) included as Exhibit A to the Initial Study and as assessed in the Risk Assessment Study, Platform Gina Gas Production and Pipeline Mandalay Onshore Receiving, prepared by EnerSource Engineering, November 21, 1989.
4. The City reserves the right to review it's policies concerning the assessment of franchise fees as they may apply to the conveying of fuel from the Mandalay Separation Facility to a public utility.
5. Applicant shall bury the new line to a depth of three feet after two years from the completion of construction should the line fail to do so, during the period under natural conditions.
6. Applicant shall provide the City with a report concerning the annual pipeline tests on an annual basis.
7. In the event that the existing pipeline is abandoned, it shall be filled with concrete.
8. Condition No. 4 of pipeline replacement approval dated November 13, 1988, is amended to require a guard 24 hours a day during construction. Condition No. 9 of the letter is amended to provide that during times of non-pipeline pulling operations construction activity landward of the mean high tide line is limited from 7:00 a.m. to 7:00 p.m. or a similar 12 hours within a 24-hour period.

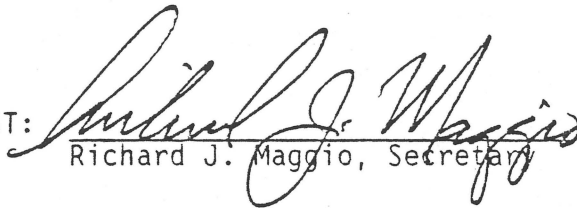
PASSED AND ADOPTED by the Planning Commission of the City of Oxnard on this
7th day of February, 1991, by the following vote:

AYES: Commissioners: Schumacher, Duff, Flores, Grey, Spray, Dressler,
Perez

NOES: Commissioners: None

ABSENT: Commissioners: None


Manuel L. Perez, Chairman

ATTEST: 
Richard J. Maggio, Secretary

APPENDIX D



COMMUNITY DEVELOPMENT DEPARTMENT • 305 W. THIRD ST. • OXNARD, CA 93030 • (805) 984-4657

RICHARD J. MAGGIO, DIRECTOR

October 3, 1985

Mr. Michael T. Bridges
Union Oil Company
2323 Knoll Drive
P.O. Box 6176
Ventura, CA 93006

Dear Mr. Bridges:

Re: Development Review Permit No. 85-5

The City of Oxnard Planning Division staff has reviewed your application for Development Review Permit No. 85-5.

The purpose of the project is to replace approximately 600 ft. (linear distance) of two 6.625 inch return water lines between your company's separation facility at Mandalay Beach and the mean high tide line--the lines return produced water to Platforms Gina and Gilda.

Prior to approving your company's request, findings were made as follows:

1. The proposed use is one permitted within the subject sub-zone and complies with all of the applicable provisions of this Chapter;
2. The proposed use would not impair the integrity and character of the sub-zone in which it would be located;
3. The subject site would be physically suitable for the land use being proposed and the proposed use will protect and maintain coastal resources including environmentally sensitive areas, adjacent to the project site; and
4. The proposed use would be consistent with all policies of the Oxnard Coastal Land Use Plan.

Based upon the above findings, Development Review Permit No. 85-5 is hereby approved subject to the following conditions:

1. The intent of all conditions set forth in Resolution No. 6213, approving Special Use Permit No. 806 to permit an onshore treating facility, associated pipelines, and a pipe fabrication area shall be met. For reference, emphasis should be placed on the requirements set forth in

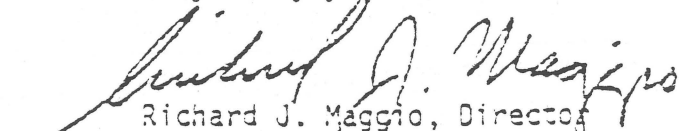
Development Review Permit No. 85-5
October 3, 1985
Page 2

conditions numbers 27 "e" (introductory paragraph) 1, 3, and 5; "g" 1, 2 (deleted), 3, 4, and 5; and 34; and 36 (the report previously prepared by Intersea Research may be utilized for the intended purpose, if upgraded and approved by both the Parks and Community Development Directors).

2. Alternative number 6 (Bore Casing through Dune, conventionally replace remaining sections of pipelines) as described in the Engineering Study and Report--Mandalay Facility-- 6 in. Water Return Pipelines (July 1985) is approved.
3. A copy of this Development Review Permit and Resolution No. 6218 must be posted at the construction site or on an interior wall of the control room at the Mandalay Separation Facility.

Building permits and authorizations for any improvements requiring approval by the Building Division must be pursued separately. Should you have any questions regarding this permit, please call Ralph J. Steele-Planner of this office at (805) 984-4657.

Very truly yours


Richard J. Maggio, Director
Community Development Department

agu

RJS:mcd

cc: Coastal Commission

Enclosure

APPENDIX E
STATE LANDS COMMISSION MITIGATION

APPENDIX E

CALIFORNIA STATE LANDS COMMISSION
MITIGATION MONITORING AND REPORTING PLAN
FOR THE
PLATFORM GINA PROPOSED RETURN WATER LINE REPLACEMENT
AND CONVERSION TO PRODUCED GAS PROJECT

RECEIVED
SEP 13 1991

CALIFORNIA
COASTAL COMMISSION

INTRODUCTION

This document contains the Mitigation Monitoring and Reporting Plan (the Plan) for Union Oil Company of California's (Unocal) replacement of a portion of a 6.625-inch diameter water line from Platform Gina to the onshore treating facility immediately downcoast of the Mandalay Generating Station in Oxnard, Ventura County, and conversion of the entire line to a produced natural gas pipeline.

Recently adopted California legislation (AB 3180, CORTESE) requires public agencies to adopt monitoring programs to ensure that mitigation measures contained in the environmental document adopted for a project are effectively implemented. This document is designed to ensure that mitigation measures contained in the Negative Declaration for "Platform Gina Proposed Return Water Line Replacement and Conversion to Produced Gas" (State Clearinghouse Number 90010478) are properly implemented.

This plan consists of a narrative text and attachments and will serve as a part of the California State Lands Commission's Mitigation Monitoring and Reporting Plan for this project.

IMPLEMENTATION

Responsibilities

Unocal (LESSEE), its representatives, or successors-in-interest remain responsible for full implementation of all mitigation measures adopted in the Negative Declaration.

The California State Lands Commission (SLC), as the State's trustee for the use of the sovereign tide and submerged lands, and as a Responsible Agency under the California Environmental Quality Act (CEQA), is responsible for assuring full compliance with the provisions of this Plan. The SLC may contract with outside consultants or contractors for monitoring activities. The SLC will also ensure that monitoring reports are received complete, in a timely manner, and that violations are promptly corrected.

The implementation requirements designed to achieve the environmental objectives of this construction project are as follows:

1. LESSEE shall allow LESSOR'S staff and/or LESSOR'S consultant open and non-discriminatory access to the pipeline repair and conversion project for the purposes of the Mitigation Monitoring and Reporting Plan (the Plan) including inspection of the construction and related operations.
2. LESSEE shall provide temporary field office space on or in close proximity to the project construction site for LESSOR'S staff use during the period of the project. The office shall be furnished for staff use and shall be supplied with electric power, light and telephone service. All costs associated with the provision of such field office shall be borne by LESSEE.
3. LESSEE shall provide LESSOR with copies of certified reports of all tests conducted by LESSEE or his appointed agent that verify the structural integrity and safety of all elements of the construction.

Such reports shall be provided to LESSOR promptly as they become available to LESSEE during the course of the project and they shall include but not be limited to:

- a. pipe manufacturer's mill tests to certify that the pipe supplied meets the project's structural and dimensional specifications.
- b. tests qualifying the application of the XTRU polypropylene corrosion coating, the concrete weight coating and the cathodic protection anodes, including their attachment to the pipe.
- c. test results qualifying the pipe welding procedure.
- d. test results qualifying project pipeline welders.
- e. non-destructive examination results of all welds, weld repairs and cut-out rewelds made on the pipeline including appurtenances (flanges, fittings, connectors, etc.). LESSOR'S staff shall be provided timely and unrestricted access to review all pipeline weld radiographic examinations.

- f. manufacturer's report certifying the PLIDCO subsea fitting to be used on the project.
 - g. results of all hydrotesting or other pressure testing procedures conducted on the pipeline together with a certified analysis of each test's results.
 - h. any other reports or information related to the project when requested by LESSOR.
4. LESSEE shall inform LESSOR of what construction vessel is selected and submit a complete pipeline pulling operations plan for staff approval, a minimum of 60 days prior to the start of construction.
 5. LESSEE shall submit a complete set of construction contract documents, including construction drawings and specifications, together with the contractor's project execution plan and critical operations and curtailment plan, to the Commission staff for approval a minimum of 60 days prior to the start of construction.
 6. LESSEE shall provide LESSOR with written notice at least five (5) days in advance of any pressure test to be conducted on the pipeline.
 7. The replacement pipeline shall be buried under a minimum four (4) feet of sand cover across the beach area and seaward to at least zero (0) feet mean lower low water (MLLW).

In the event that natural conditions should fail to bury the new pipeline to a depth of two feet from zero (0) MLLW to minus fifteen (-15) below MLLW, within two (2) years from completion of construction, LESSEE shall bury the line with hydraulic jetting to three (3) feet below the sand bottom within these limits.

The replacement pipeline shall be placed so that a lateral separation of at least three (3) feet is maintained from any portion of the original (replaced) pipeline left in place.

8. In the event that LESSOR'S staff determines that the work being performed is not in conformance with the project plans and specifications, with LESSOR'S rules and regulations and generally accepted industry codes and standards governing the integrity and safety of the

construction, or with any of the conditions set forth in this lease amendment, LESSOR'S staff may immediately order LESSEE, either orally or in writing, to redirect or suspend a specific activity until LESSOR is assured that the non-conformance issue is resolved. If such redirection or suspension can be shown by LESSEE to be potentially threatening to life, health or safety, the required corrective action may be temporarily deferred but shall be implemented as soon as the potential threat is past.

9. LESSEE shall submit for LESSOR'S review and approval all contract changes affecting the design and/or construction of the project before such changes are implemented.

10. LESSEE shall make internal and external inspections of that portion of the pipeline on STATE tide and submerged lands at least once a year following the completion of the pipeline repair project. The internal inspection shall include running an electronic survey tool through the pipeline. If LESSEE can demonstrate that running an internal inspection tool is not feasible, LESSEE may submit an alternate testing procedure for review and approval by LESSOR'S staff. External inspections shall be visual for the purpose of determining evidence of unburial, free-spanning, corrosion or any other condition that may be hazardous to the pipeline. Upon the request of LESSEE the frequency and method of inspections may be reduced by LESSOR depending on the degree of corrosion or other observed problems.

shall be changed

LESSEE shall make additional internal or external inspections if so directed by LESSOR whenever LESSOR determines that such inspections are warranted by any unsafe or emergency conditions.

Copies of the results of all internal and external inspections including reports, analyses and recommendations prepared by or for LESSEE shall be submitted promptly to LESSOR.

11. LESSEE shall test the corrosion control cathodic protection system of the pipeline at least once a year to determine that the system meets its designed protection criteria and the cathodic protection requirements of Title 49 CFR (October 1990 Edition), Part 192, Subpart I - Requirements for Corrosion Control. LESSOR shall be promptly notified of any deficiencies indicated by the testing and any needed remedial action shall be taken as expeditiously as possible.

12. LESSEE shall conduct semi-annual maintenance inspections to test the satisfactory operating condition of each emergency block valve and emergency shut-down valve protecting the pipeline. Any deficiencies discovered during such semi-annual inspections shall be corrected as expeditiously as possible. LESSEE shall provide LESSOR with a written report of each semi-annual inspection. The report shall describe any deficiencies discovered and the remedial action taken.
13. LESSEE shall provide LESSOR an "as-built" report within one hundred and twenty (120) days after completion of construction. This report shall include the results of a survey of the route of the pipeline and pertinent maps and text indicating any debris, potential hazards or changes to the seafloor that may have occurred during installation. Hazardous debris shall be removed and other concerns shall be mitigated as specified by LESSOR'S staff. Such "as-built" report shall consist of map(s) with grid references (Lambert and Latitude-Longitude coordinates) for all turning points in the line, beginning and end points, and other pertinent data as may be required by LESSOR'S staff. LESSEE shall submit a certified declaration by a licensed engineer or licensed surveyor indicating that the improvements are accurately located and depicted on the map(s).
14. The three thousand (3,000) foot portion of the original 6 5/8 inch pipeline that is to be replaced shall be removed from its onshore end to zero (0) feet below mean lower low water depth (MLLW). The remaining portion of the original pipeline left in place shall be filled with concrete for its entire length and it shall be capped with one quarter (1/4) inch steel cover plates welded onto each end. This option is to be considered a temporary abandonment of the concrete filled portion of the 6 5/8 inch pipeline left in place, with the understanding that complete removal of this portion may be required by LESSOR in the future if removal of the adjacent 10 3/4 inch line is also required upon its abandonment.
15. LESSEE shall furnish LESSOR a yearly report detailing the volume of gas or other fluid transported through the pipeline and an analysis of the gas or fluid content, especially the presence and concentration of any corrosive elements such as hydrogen sulfide (H₂S).

16. LESSEE shall assume full responsibility for keeping informed of and being in compliance with all federal, State, and local laws, ordinances and regulations which in any way govern the execution of the project. LESSEE shall ensure that LESSEE'S employees and LESSEE'S agents and their employees shall observe and comply with all such regulations.

LESSEE shall protect, indemnify and in all respects hold harmless LESSOR and all LESSOR's staff and/or consultants against any claim or liability from any source or cause whatsoever arising from the execution of the project.

Reporting

Compliance with mitigation measures shall be verified by SLC's project monitor(s) using the enclosed reporting form.

COMPLIANCE

The SLC, or its designated site monitor(s), may be present at the project site throughout the construction phase of the project to ensure compliance. Within five (5) working days of completion of construction activities the SLC will notify LESSEE, in writing, of its determination that the required project construction mitigations have been complied with.

VIOLATIONS

If the monitoring reports identify violations of the mitigation program, the SLC shall:

- notify LESSEE or its designated representative(s) by telephone and order immediate compliance;
- prepare a written notification to LESSEE or its designated representative(s) of the violation ordering compliance; and
- identify the need for a follow-up field inspection.

If LESSEE fails to comply with the required mitigation plan, the SLC monitor(s) may order work to be stopped until compliance is achieved and notification is given by the SLC that work may commence.

If a dispute arises concerning the implementation or success of a mitigation, the dispute may be referred to the Chief of Enforcement and Compliance for a decision and for possible legal action. In such a case, work on the project will be stopped until the dispute is resolved.

COST REIMBURSEMENTS

All costs for the administration and implementation of the Plan shall be paid by LESSEE. Prior to commencement of construction, LESSEE shall execute a Reimbursement Agreement with the SLC to provide for the recovery of the total cost to implement the Plan. LESSEE shall deposit with the SLC an applicable expense deposit, including, but not limited to the amount required under the Reimbursement Agreement. The Plan fees are calculated based on actual or estimated costs plus proportional overhead. If the deposit amount is less than actual cost, LESSEE shall be required to submit additional costs within an allowable time period.

ENFORCEMENT AND PENALTIES

A determination of non-implementation or non-compliance will result in immediate notification by the SLC to LESSEE as described above. If possible, the SLC or its designated monitor(s) will order and achieve immediate compliance. If the project is not brought into immediate compliance, a stop-work-order may be prepared. The period of time the stop-work-order will be enforced will be the time required to assure compliance has been achieved. Work on the project may not be resumed until compliance is achieved. Violations of an approved mitigation measure which are not discovered until after construction has been completed will result in one or more of the following actions:

- written notification and demand by the SLC for correction,
- issuance of an infraction citation,
- forfeiture of any bond trust account, or other financial assurance, and/or
- action to recover funds assured under a letter of credit.

PROJECT TITLE		ISSUE AREA	
MITIGATION MEASURE	REQUIREMENT TO COMPLY	LESSEE/PERMITTEE: _____	
		MONITOR: _____	
		DATE	COMMENTS
		Compliance: Date _____	
		Yes [] No []	