## CALIFORNIA COASTAL COMMISSION

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November 25, 1991

William Weldon Unocal North American Oil and Gas Division 2323 Knoll Drive, Box 6176 Ventura, California 93006

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RE: Consistency Certification No. CC-65-91: Platform Gina DPP Revision

Dear Mr. Weldon:

The Coastal Commission received Unocal's consistency certification for the Platform Gina DPP Revision on September 27, 1991. This DPP Revision covers the following activities: 1) repair and replacement of the water return pipeline (located in state waters); 2) conversion of the water return pipeline to gas sales service; 3) drilling of a maximum of seven additional wells at Platform Gina; 4) addition of temporary gas processing facilities at Platform Gina; and eventually, 5) expansion of the deck and the addition of permanent gas processing facilities to Platform Gina, when production proceeds to full field development.

Pursuant to 15 CFR 930.79, at the earliest practicable time, the Commission shall notify the applicant, the Minerals Management Service, and the Assistant Adminstrator for Coastal Zone Management of the National Oceanic and Atmospheric Administration of its concurrence or objection to the consistency certification. If the Commission has not issued a decision within three months following commencement of review, it shall notify the applicant, the Minerals Management Service, and the Assistant Administrator for Coastal Zone Management of the National Oceanic and Atmospheric Administration of the status of the review and the basis for further delay in issuing a final decision. Notice shall be in written form and postmarked no later than three months following the Commission's receipt of the certification and supporting information.

In accordance with its responsibilities under the California Coastal Management Act, the Commission has consulted with a number of agencies, including the California Air Resources Board, the Ventura County Air Pollution Control District (APCD), and the Santa Barbara Air Pollution Control District (APCD). As you are aware, both the Ventura County APCD and Santa Barbara APCD have reviewed the information sent to them by the Minerals Management Service. Both have requested additional information in order to allow them to complete their review. In addition, Ventura County APCD and MMS are working

to resolve the following issues: 1) how the APCD's onshore air rules can be addressed by this project; and, 2) how needed conditions, which UNOCAL has verbally agreed to and included as part of the project description, can be incorporated into the MMS permit. Thus, we are still in the process of our required coordination with the other affected state and local agencies concerning the air quality impacts, which were raised during this consistency review.

Since the Commission's required coordination with the APCDs will not be completed in time for the Commission to evaluate and review the entire proposed project at its December 10-13, 1991 meeting, the Commission will not be able to issue a decision within three months following commencement of review. Accordingly, we are informing you that we require the full six-month period for consistency review. As we have discussed, the project will be scheduled for the Commission's January hearing, provided we get the APCD issues resolved.

Sincerely,

Robin T. BLanchfield Project Manager

cc: Mr. Thomas Dunaway
Regional Supervisor - Office of Field Operations
Minerals Management Service, Pacific OCS Region
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Camarillo, CA 93010

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