

CALIFORNIA COASTAL COMMISSION

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TO GLENN SHACKELL	FROM C/O GUY PETER WILSON, Governor
CO. MMS	CU. ECL, 6/22/67
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October 19, 1993

Copy to

RSCOE) Attn: C/Ed

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Shackell
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Mr. Thomas Dunaway, Regional Supervisor
Office of Field Operations
Minerals Management Service (MMS), Pacific OCS Region
770 Paseo Camarillo
Camarillo, CA 93010

Subject: Chevron Platform Gail SulferOx Operations - Proposed
Transport-to-Shore and Injection of SulferOx Process Water

Dear Mr. Dunaway:

This letter is in reply to your October 5, 1993 letter, with attachments, to staff requesting comments on Chevron's proposed modification to its MMS-approved SulferOx operations at OCS Platform Gail.

As proposed, Chevron plans to transport approximately 100 gpd of SulferOx process water² from Platform Gail, using existing crew and supply boat runs, for disposal onshore at the Class II injection well "Fletcher" 143 in northern Santa Barbara County. Transport and injection of the SulferOx fluids would continue until (1) the Environmental Protection Agency (EPA), Region 9 issues a National Pollutant Discharge Elimination System (NPDES) permit authorizing ocean discharge of the process water and (2) the Coastal Commission concurs in a consistency certification by Chevron pertaining to such discharge.

Based on its review of the information submitted, the staff believes that Chevron's proposal (1) is consistent with the Platform Gail DPP and the staff's related May 25, 1993 determination [see footnote 1] and (2) will thus not affect the coastal zone for purposes of 15 CFR, Section 930.51(b).

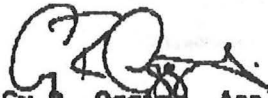
¹ On May 25, 1993, the staff determined that (1) no further consistency review of Chevron's proposal to install the SulferOx unit was necessary pursuant to 15 CFR, Section 930.51(b) and (2) the Commission would need to review and concur with a certification by Chevron that SulferOx Unit discharges under an EPA-approved NPDES permit were consistent with the federally-approved CCMP. Chevron's original proposal called for discharge of SulferOx process water to the ocean under a revised Final NPDES permit (No. CA0110737) approved by the EPA, Region 9. The Commission's consistency review of discharges pursuant to Final NPDES Permit No. CA0110737 for Gail is pending.

² The SulferOx unit uses a chelated iron solution to reduce H₂S in natural gas to elemental sulfur and water. Wastewater results from sulfur cake rinsing, clean-out of processing vessels, and periodic purging of the system to remove contaminants. (EPA, Fact Sheet for NPDES Permit No. CA0110737, Platform Gail, p. 4.)

Specifically, the staff has determined that (1) transport-to-shore of the SulferOx fluids will not result in adverse impacts to air quality, marine water quality, marine resources, commercial fishing, or vessel traffic since the fluids will be transported during existing crew and supply boat runs, and (2) impacts to land resources or related to increased motor vehicle traffic during transport of the fluids to the injection site are expected to be insignificant. In addition, the State Division of Oil and Gas (DOG) has approved injection of the SulferOx fluids into the "Fletcher" 143 injection well. (Letter from William Brannon, DOG, to M.P. Monroe, Chevron, October 18, 1993.) The Commission staff has consulted with the DOG and the Santa Barbara County Resource Management Department (SBCRMD) in reaching this staff determination. (Pers. comm. with Al Koller, DOG, October 18, 1993; and Vida Strong, SBCRMD, October 15, 1993.)

If you have any questions, please call me at (415) 904-5249.

Sincerely,



Cy R. Oggins, Analyst
Energy and Ocean Resources Unit

cc: Mr. Eugene Bromley, EPA, Region 9
Mr. A. Cornelius, Chevron USA
Mr. Bill Douros, SBCRMD
Mr. Al Koller, DOG

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