



# United States Department of the Interior

## BUREAU OF OCEAN ENERGY MANAGEMENT

Pacific OCS Region  
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Camarillo, CA 93010-6064

Memorandum

MAY - 2 2013

To: Regional Supervisor, Office of Strategic Resources

From: Regional Supervisor, Office of Environment *ptf*

Subject: Findings Summary for the Environmental Assessment for Revisions to the Platform Hidalgo Development and Production Plan to Include Development of the Western Half of the Northwest Quarter of Lease OCS-P 0450

Please see the attached Findings Summary which states that based on the analysis presented in the attached Environmental Assessment (EA), no new or supplemental environmental impact statement is necessary, and no further NEPA analysis is required for the proposed project.

In the *Accompanying Information Volume* submitted as part of the application by Plains Exploration and Production Company (PXP), a number of specific actions were proposed in order to avoid or minimize potential environmental impacts. In the course of completing the attached EA, we identified several additional specific measures. We recommend that the following actions are identified as conditions of approval in your response to PXP's application:

1. PXP shall ensure thorough consultation with the Santa Barbara County Air Pollution Control District so that the proposed project provides emission offsets for the maximum allowable project emissions expected, consistent with that entity's applicable rules and regulations (PXP Environmental Evaluation, p. 87);
2. PXP will take the following measures when murrelets are present in the project area (PXP Environmental Evaluation, p. 77)
  - a. Minimization of use and wattage of night lighting to the extent feasible while not compromising safety, spill detection capabilities, or platform operations,
  - b. Shielding of lights, covering of filaments, and directing lighting downward as much as is feasible,
  - c. Requiring that all marine vessels associated with the project also employ measures 2(a) and 2(b), above, and
  - d. Developing a comprehensive monitoring program for the waters around the platform for Scripps's and Guadalupe murrelets, Ashy Storm-petrel, and Cassin's auklet.
3. PXP shall consult with the Joint Oil/Fisheries Liaison Office (JOFLO, PXP Biological Evaluation p. 53) in the following circumstances
  - a. When marine vessels are used for the project, to ensure use of JOFLO approved traffic corridors, and

- b. To resolve disputes over alleged damage to commercial fishing gear arising from the project;
4. All personnel associated with marine support vessel operations should be trained with the Wildlife and Fisheries Training video (Pacific Operators Offshore, LLC, 2009).

If you have any questions on these measures, or need any further information, please do not hesitate to contact me.

**Attachment**

## Findings Summary

In 1984, Minerals Management Service developed the *Point Arguello Field and Gaviota Processing Facility Area Study and Chevron/Texaco Development Plans EIR/EIS* (ADL, 1984). The purpose of this joint State of California/Federal document was to evaluate different construction and development scenarios for developing oil and gas in the Point Arguello Field. The document evaluated the potential impacts of the alternatives on a comprehensive list of physical, biological, and socioeconomic resources. BOEM has tiered this EA to the 1984 document.

Since the finalization of the 1984 EIR/EIS, Platform Hidalgo was installed in 1986, a supplemental EIR was finalized in 1988 to build the Gaviota processing facility and production began from the Point Arguello Field in 1991. Since that time, technology has developed in extended-reach drilling so that new production fields can be accessed by existing platforms. In 2003, a DPP revision was approved to allow the development of the eastern half of Lease OCS-P 0451 (i.e., Rocky Point Field), not originally considered by the Platform Hidalgo DPP. Plains Exploration and Production Company (PXP) proposes to develop and produce commercial quantities of oil and gas from Platform Hidalgo, located on the Federal OCS, by drilling two wells into the Electra Field located in the northwest quarter of Federal Lease OCS-P 0450. The proposed development of the Electra Field will add production of oil and gas to the existing Point Arguello Unit facilities and production operations. The purpose of this EA is to evaluate effects of the proposed project and determine whether (1) the proposed project is a substantial change from the actions evaluated in the original 1984 EIR/EIS relevant to environmental concerns; or whether, (2) there are significant new circumstances or information relevant to environmental concerns and bearing on the actions described in the original 1984 EIR/EIS or its impacts (40 C.F.R. §1502.9(c)).

Current baseline operations are defined as the No Action Alternative, which are described in Chapter 2. Chapter 3 evaluates effects of the proposal relative to current operations/no action alternative.

The proposal to drill in a new oil field is not a substantial change from the actions evaluated in the 1984 EIR/EIS to produce oil and gas elsewhere in the same lease. The size and location of the proposed project, and the scope of the incremental environmental impacts resulting from the proposed project, are roughly equivalent to those described in the 1984 EIR/EIS.

The discussions in Chapter 3 focus on new circumstances or information not previously disclosed in the 1984 EIR/EIS. The new circumstances or information relevant to environmental resources identified in this analysis include:

- Greenhouse gases;
- Lighting effects on marine birds;
- Essential Fish Habitat (EFH); and
- Environmental Justice

Impacts to these resources, while not considered in the 1984 EIR/EIS, do not represent significant, new circumstances or information relevant to the environment and bearing on the proposed action, primarily because the incremental impacts are temporary in nature and negligible as compared to the current baseline operations on Platform Hidalgo. GHG emission

increases from the proposed drilling activities are less than the local regulatory body's preliminary established thresholds. Increase in lighting associated with the project is one-eighth the total wattage that currently exists on Platform Hidalgo, and have multiple measures planned to minimize the potential for impacts to sensitive seabird species. The requirements for both EFH and Environmental Justice came into being after the 1984 EIR/EIS was completed. However, neither of these resources is expected to be significantly impacted by the proposed project.

The remaining effects identified in this EA are considered additional details, or clarifications of, effects that were previously disclosed in the 1984 EIR/EIS. These effects include:

- Changes (listing and delisting) of Federally endangered species;
- Decrease in commercial fishing activities;
- Changes in air quality regulatory transfer of jurisdiction; and
- Changes to specially designated areas.

Therefore, based on the analysis presented in this EA, no new or supplemental environmental impact statement is necessary, and no further NEPA analysis is required for the proposed project.



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Rick Yarde  
Regional Supervisor  
Office of Environment



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Date