

# **Gulf of Mexico Plans Workshop**

## **Overview of Exploration and Development Plan Approval Process**

**July 18, 2017**

**Hyatt Regency New Orleans**

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**Office of Leasing and Plans**

**Gulf of Mexico Region**

# Plan Approval Process

## Additional Presenter:

Office of Environment

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Senior Technical Specialist,  
Environmental Operations Section

# EPs, DPPs, or DOCDs

- Exploration Plan (EP) - submitted prior to conducting exploration activities
- Development and Production Plan (DPP) - submitted prior to conducting development and production activities in any OCS area other than the Western Gulf of Mexico
- Development Operations Coordination Document (DOCD) – submitted prior to conducting development and production activities in the Western Gulf of Mexico

# Activities Requiring EP, DPP, or DOCD

- Exploration activities
- Development and production activities
- Geological or geophysical (G&G) exploration or development activities that:
  - penetrate the seabed
  - use explosives
  - the Regional Director (RD) determines may have a significant adverse effect environment
  - the RD determines that a plan is necessary for certain ancillary activities (seismic surveys, scientific studies)

# BOEM Reviews EP, DPP, & DOCD to ...

Determine if the proposed activities will:

- comply with applicable federal laws and regulations
- unreasonably interfere with other uses of the area or interfere with or endanger operations on other leases
- result in pollution
- create hazardous or unsafe conditions
- disturb any site, structure, or object of historical or archaeological significance

# BOEM Reviews EP, DPP, & DOCD to ...

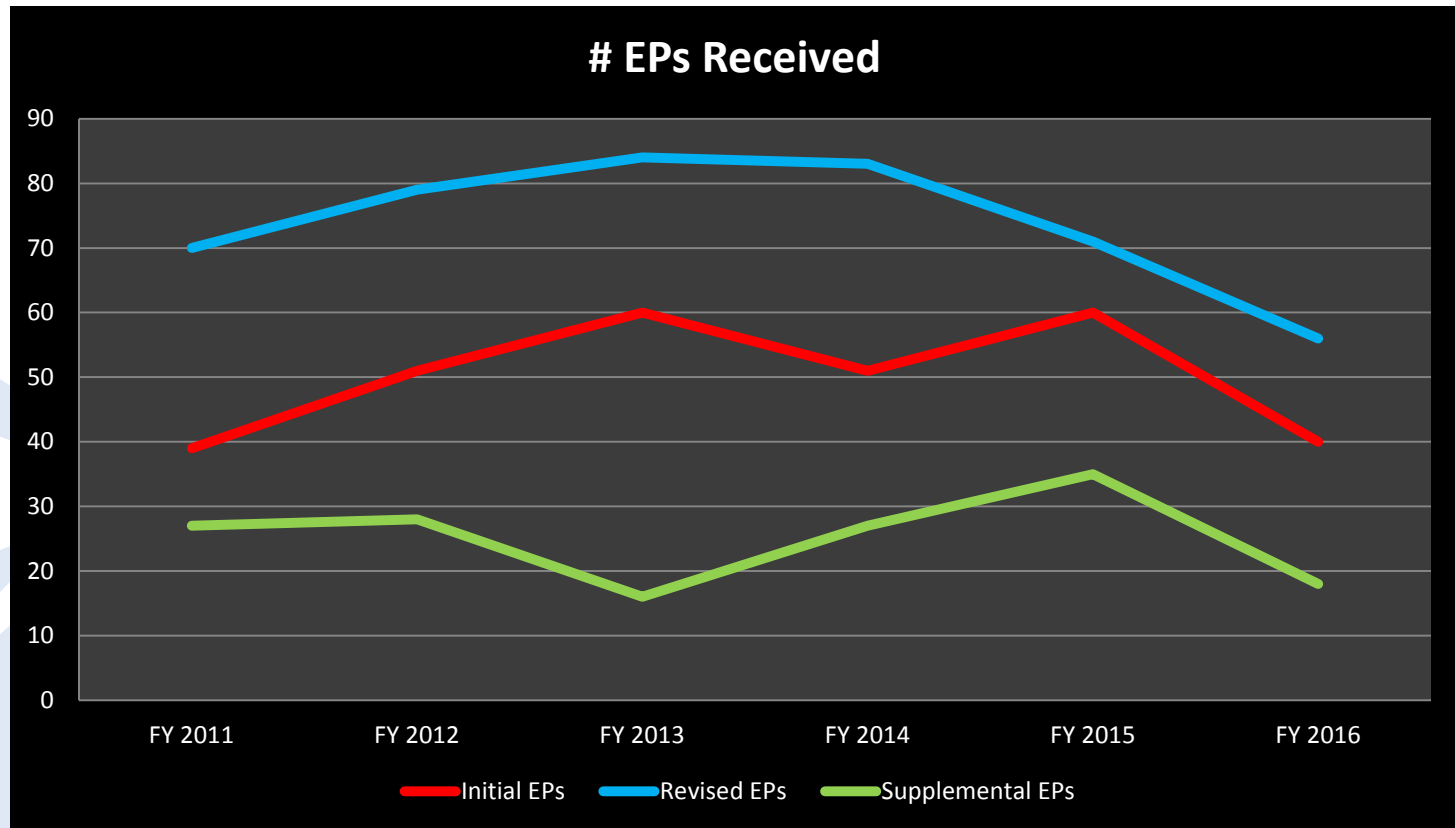
Determine if proposed activities will cause serious or undue harm or damage to:

- life
- property
- any other mineral deposits (in leased or unleased areas)
- the national security or defense
- the marine, coastal, or human environment

# Permits Requiring Plan Approval

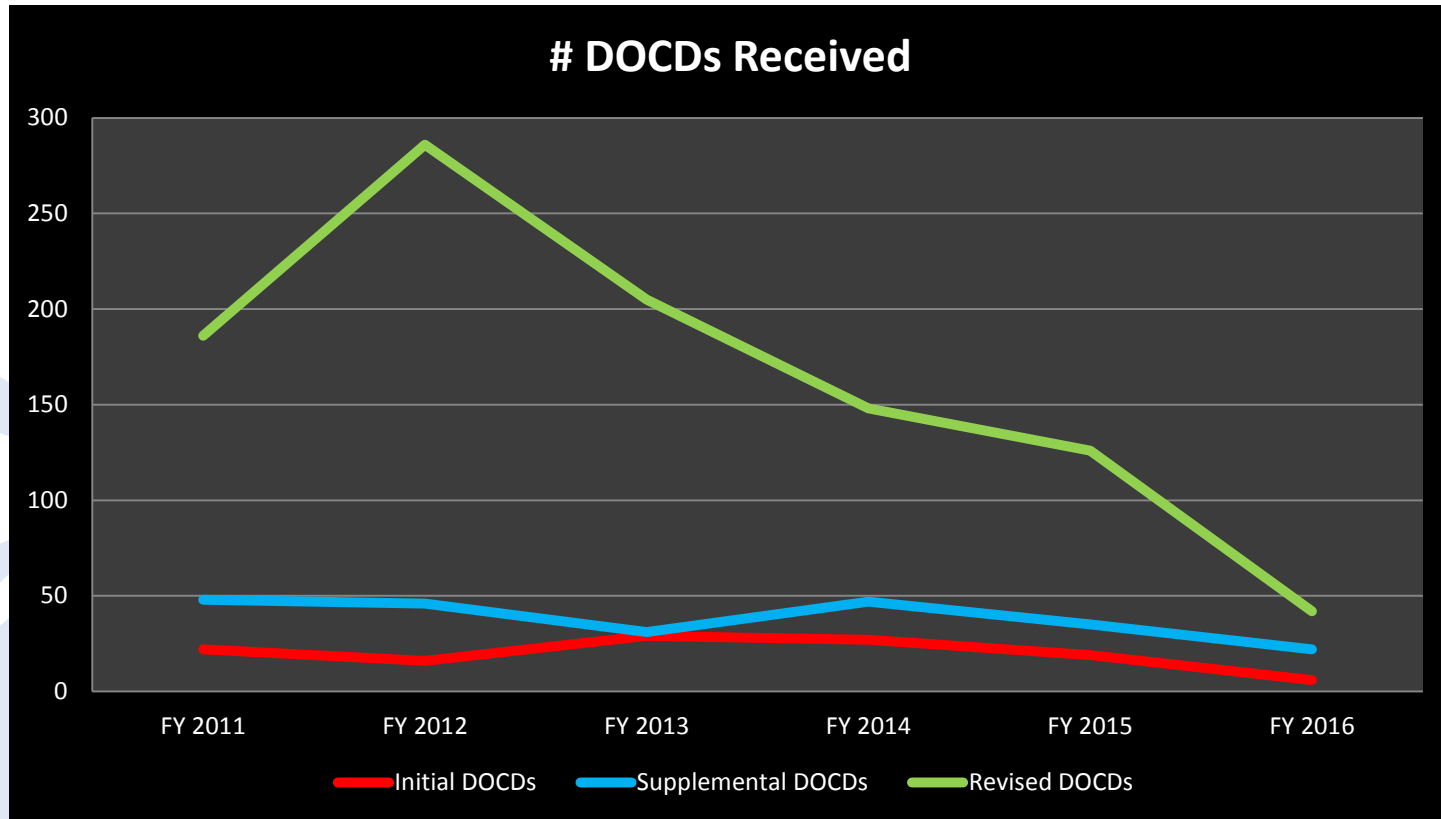
- BSEE Applications for Permit for Wells (APD, AST, APM)
- BSEE Platform applications
- BSEE Pipeline applications (lease term)

# Volume of Plans Received

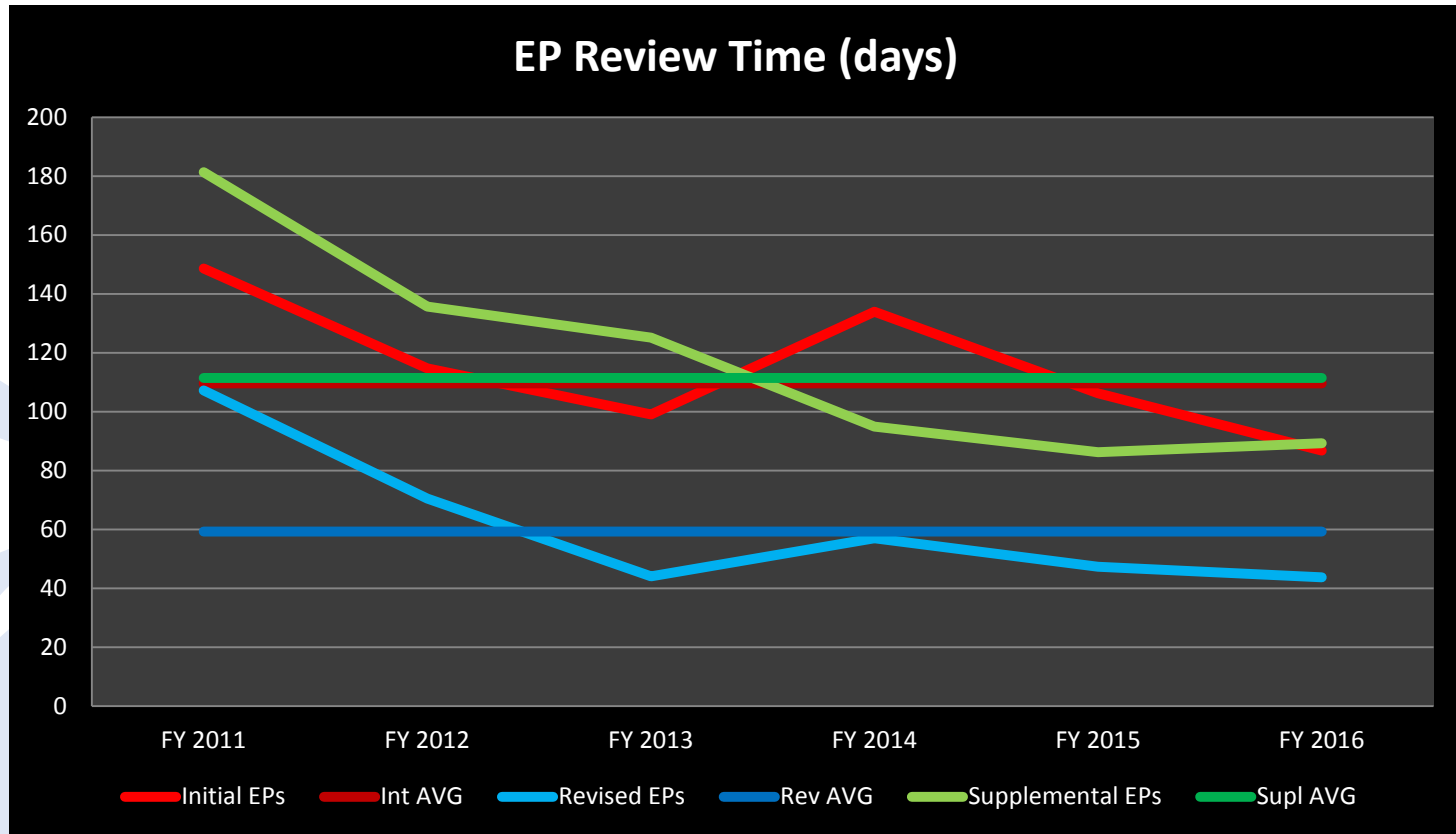




# Volume of Plans Received

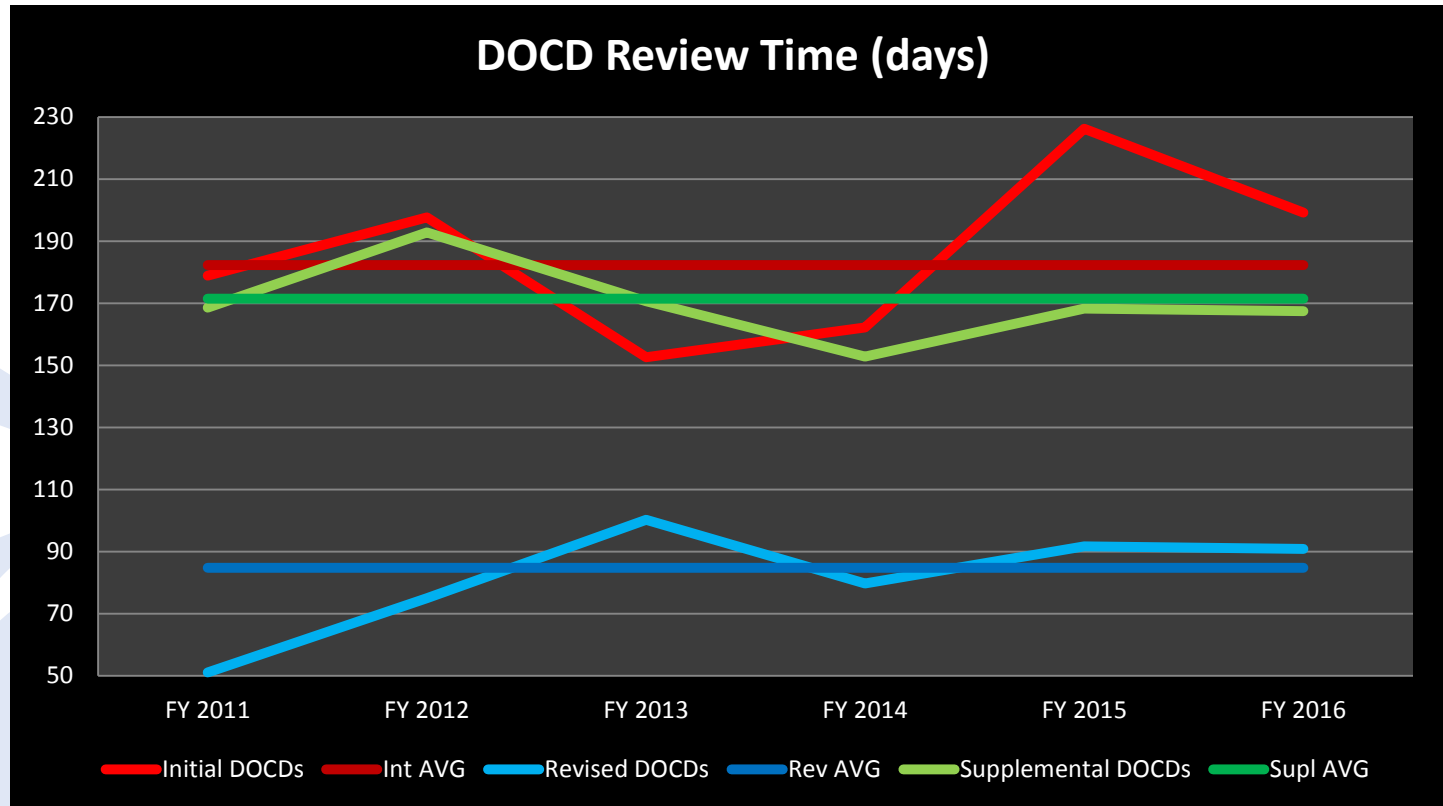


# Plan Processing Time



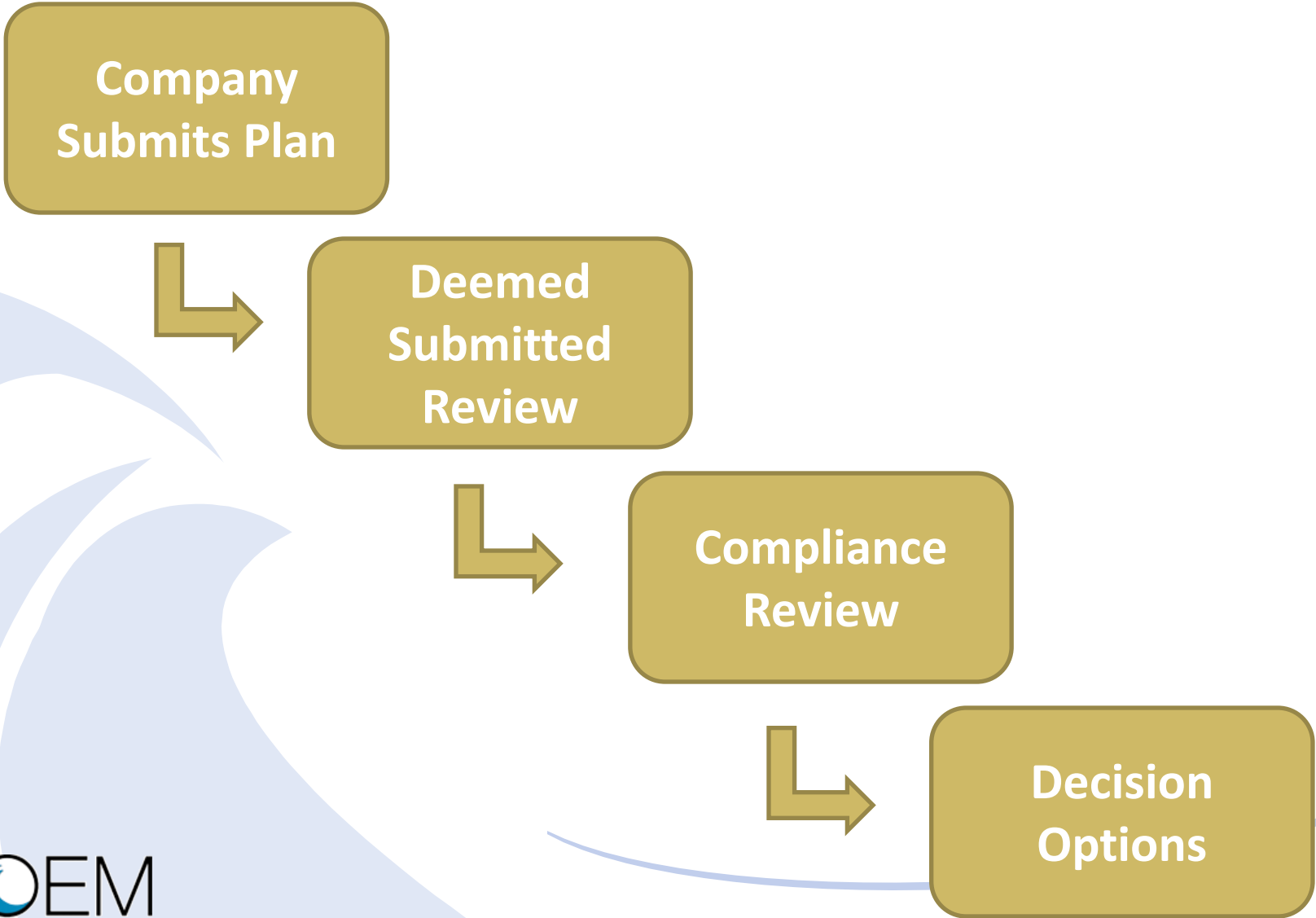
Processing time includes Requests for Information (RFI) and Operator response time to RFIs.

# Plan Processing Time



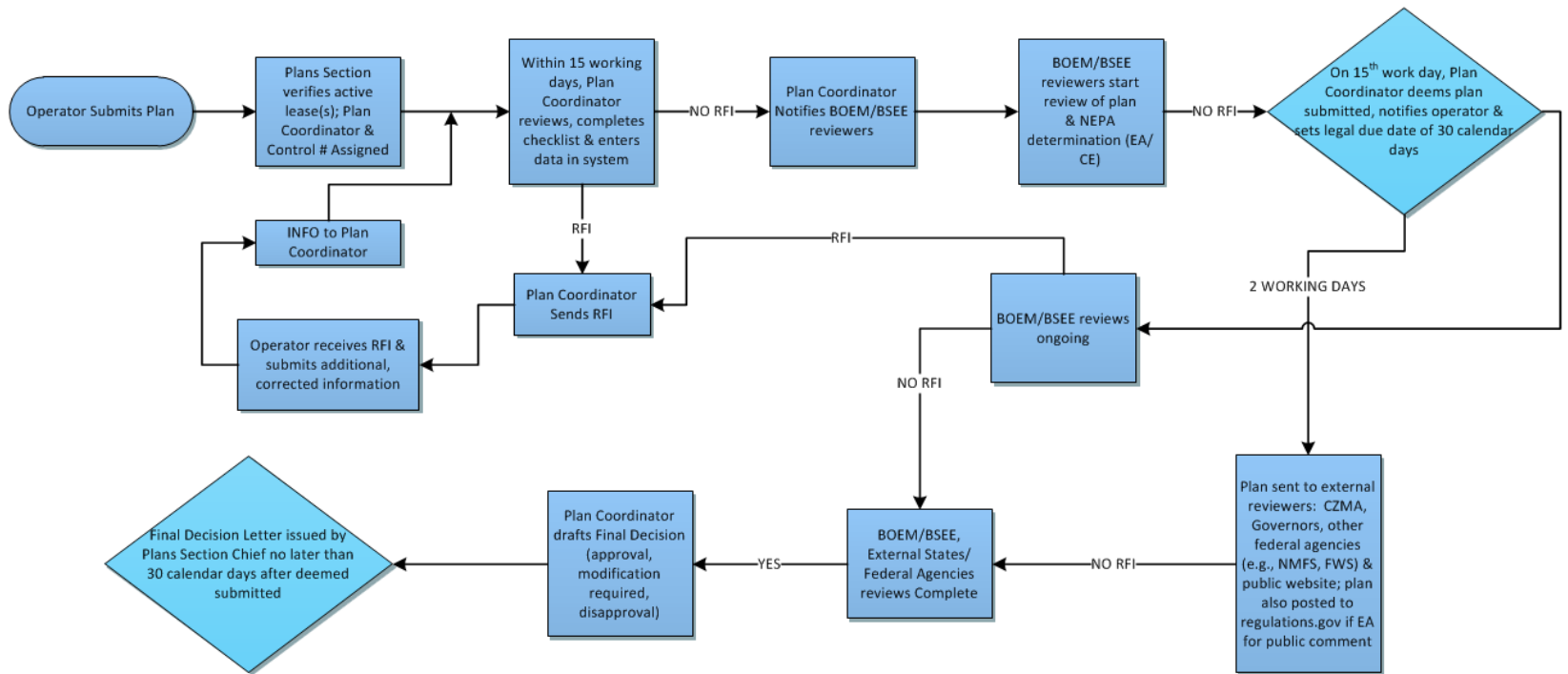
Processing time includes Requests for Information (RFI) and Operator response time to RFIs.

# Plan Review and Decision Process



# Plan Review and Decision Process

Exploration Plan Review Process



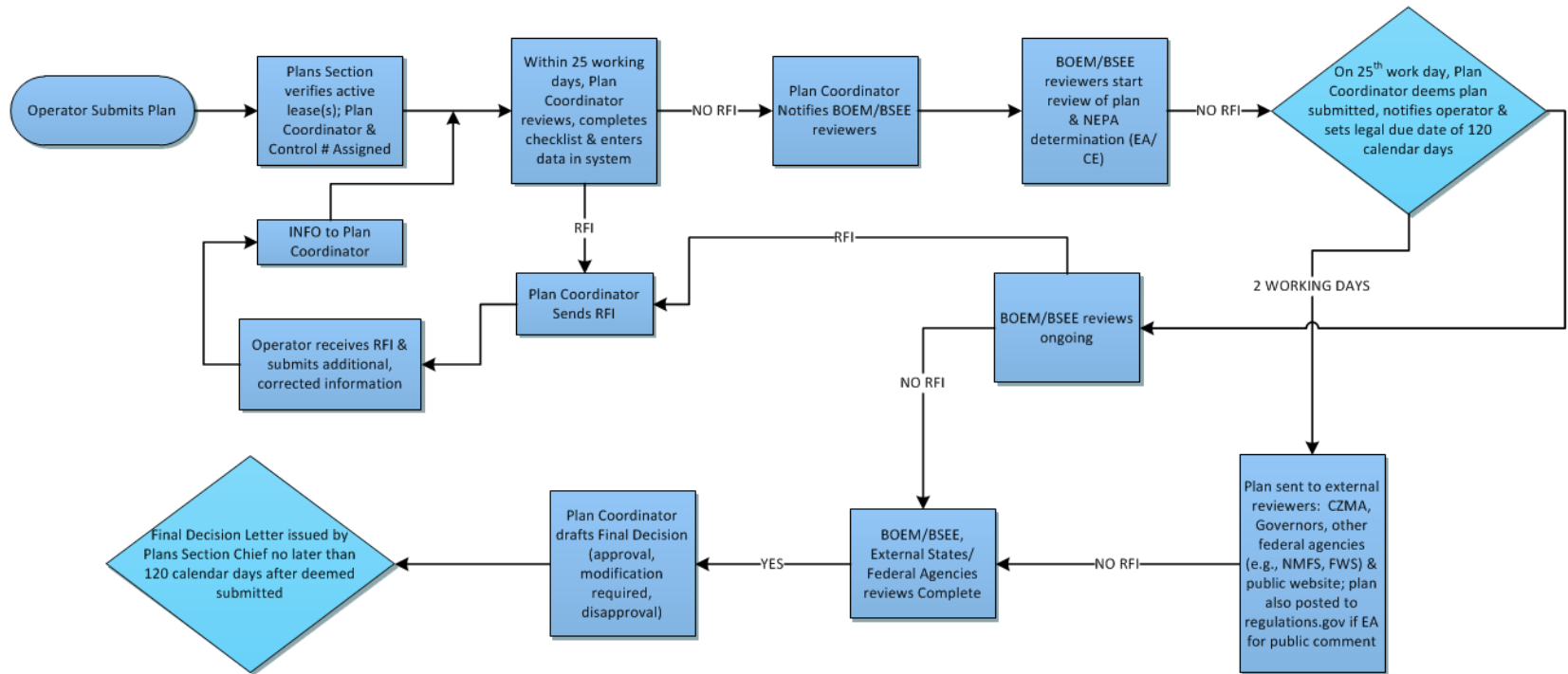
\* EP review process same for shallow water and deepwater and review timeframe set by regulations.

\* Differences in amount of time spent completing reviews and evaluating information submitted determined by complexity of proposed activities, additional analyses needed for deepwater, and additional assessments for EA NEPA determinations.



# Plan Review and Decision Process

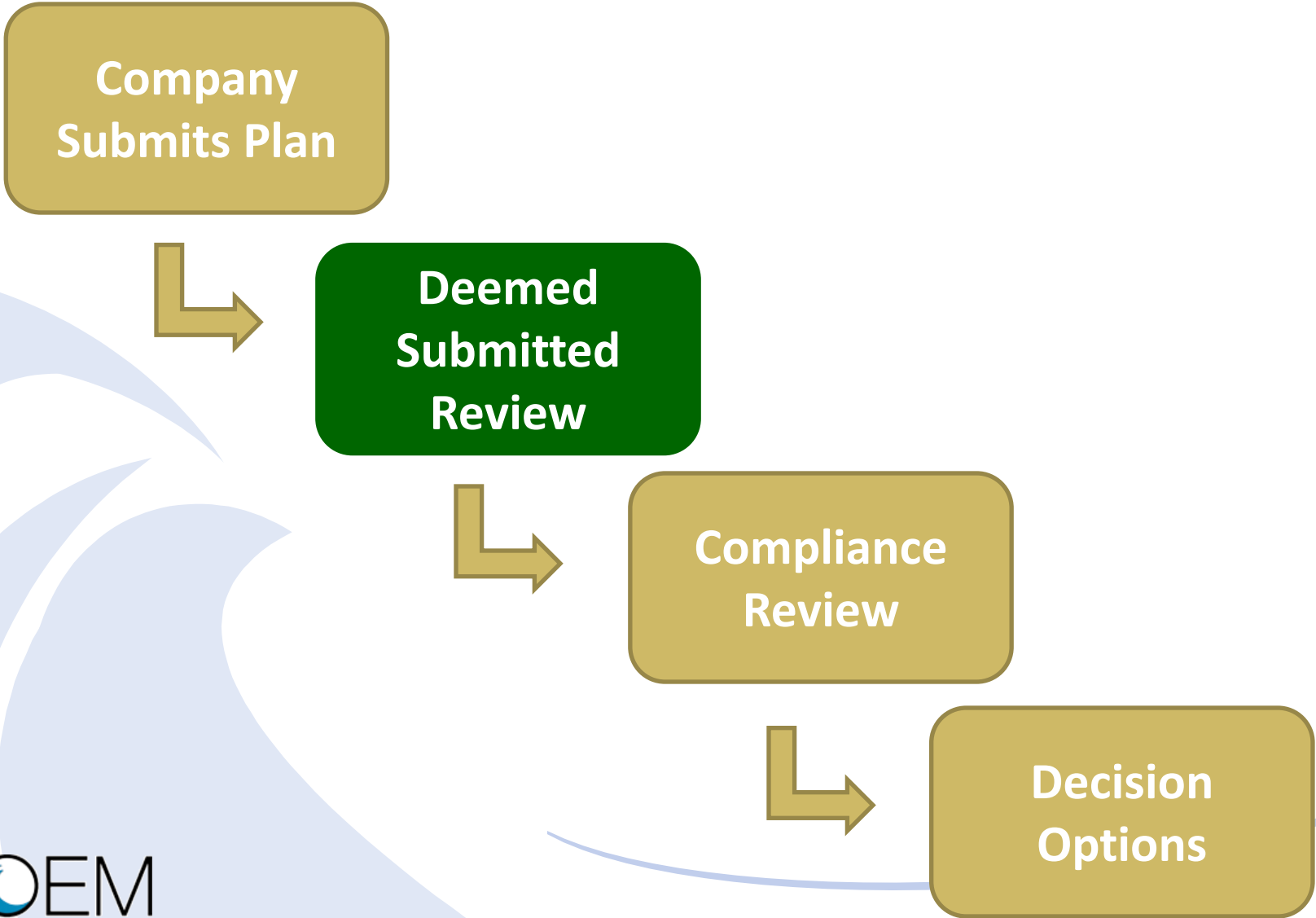
Development Plan Review Process



\* DOCD review process same for shallow water and deepwater and review timeframe set by regulations. If No Governors or local government consistency required the plan may be approved within 60 days after deemed submitted.

\* Differences in amount of time spent completing reviews and evaluating information submitted determined by complexity of proposed activities, additional analyses needed for deepwater, and additional assessments for EA NEPA determinations.

# Plan Review and Decision Process



# Plan Review and Decision Process

## Deemed Submitted Review

- 15 working days for an EP
- 25 working days for a DOCD or DPP
- Plan Coordinator reviews information to determine completeness and accuracy
- Plan Coordinator will inform operator of any deficiencies or problems that need to be addressed
- Plan Coordinator also forwards plan to other groups within BOEM to begin their review of the information submitted
- BOEM wants to ensure information is sufficiently adequate before the plan is posted for public comment and undergoes technical compliance reviews



# National Environmental Policy Act (NEPA)

- Plan submitted to OE/Environmental Operations Section (EOS) for NEPA Determination Review.
- All operator plan and permit submittals receive some type of NEPA review.
- GIS-based system used as a tool to determine the level of NEPA review to be performed.

# BOEM Postlease NEPA Compliance

## Authority

National Environmental Policy Act (NEPA) of 1969  
(Pub. L. 91-190, 42 U.S.C. 4321-4347, January 1,  
1970) as amended

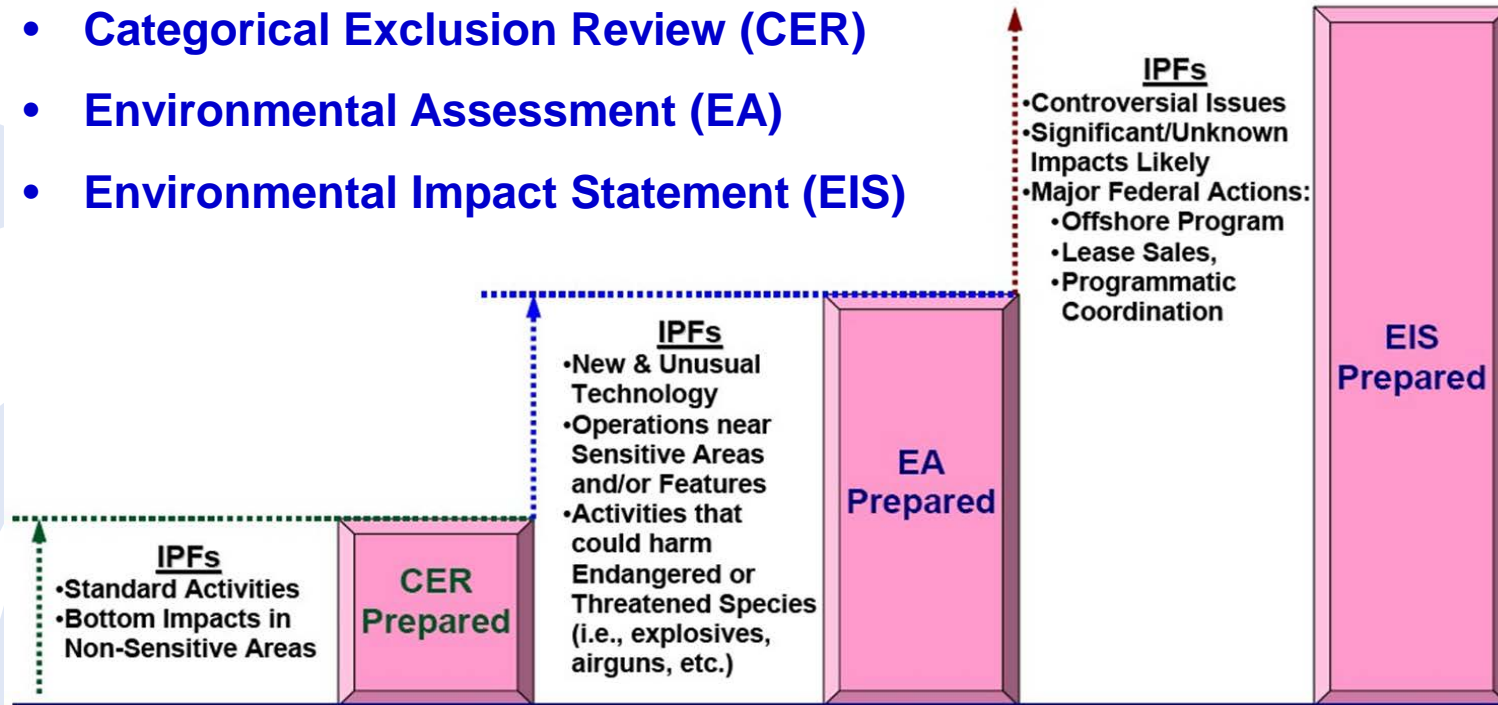
Council on Environmental Quality (CEQ) issued  
regulations (40 CFR 1500-1508) implementing NEPA  
in 1978

Department Manual Categorical Exclusions (516 DM  
15, Appendix 10)

# Levels of NEPA Review

The Level of NEPA Analysis is based upon Departmental and Agency Guidelines/Policy and Regional Triggers established for Potential Impact Producing Factors (IPFs).

- **Categorical Exclusion Review (CER)**
- **Environmental Assessment (EA)**
- **Environmental Impact Statement (EIS)**



A periodic Public Comment on  
CEs as Determined by Agency

Public Notifications Required

Public Comment Required

# Environmental Laws and Orders



Marine Mammal Protection Act

Federal Water Pollution Control Act



National Historic Preservation Act

Migratory Bird Treaty Act

**NEPA PROCESS**

Clean Air Act

Coastal Zone Management Act

Magnuson-Stevens Act



E.O. 12898: Environmental Justice

Endangered Species Act



**NEPA coordinates compliance with other environmental requirements**

# BOEM Actions Normally Requiring an EA

G&G Permit applications

- Deep stratigraphic tests

- Solid or liquid explosives

- Prospecting actions (airguns)

Deepwater\* Exploration Plans (EPs)

Development and Production Plans (DPPs)

Development Operations Coordination Documents (DOCDs) that include drilling in Deepwater\*

Applications for pipelines that go to shore or in the Eastern Planning Area of the GOM

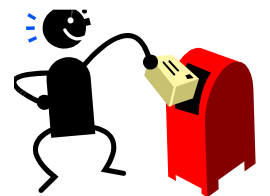
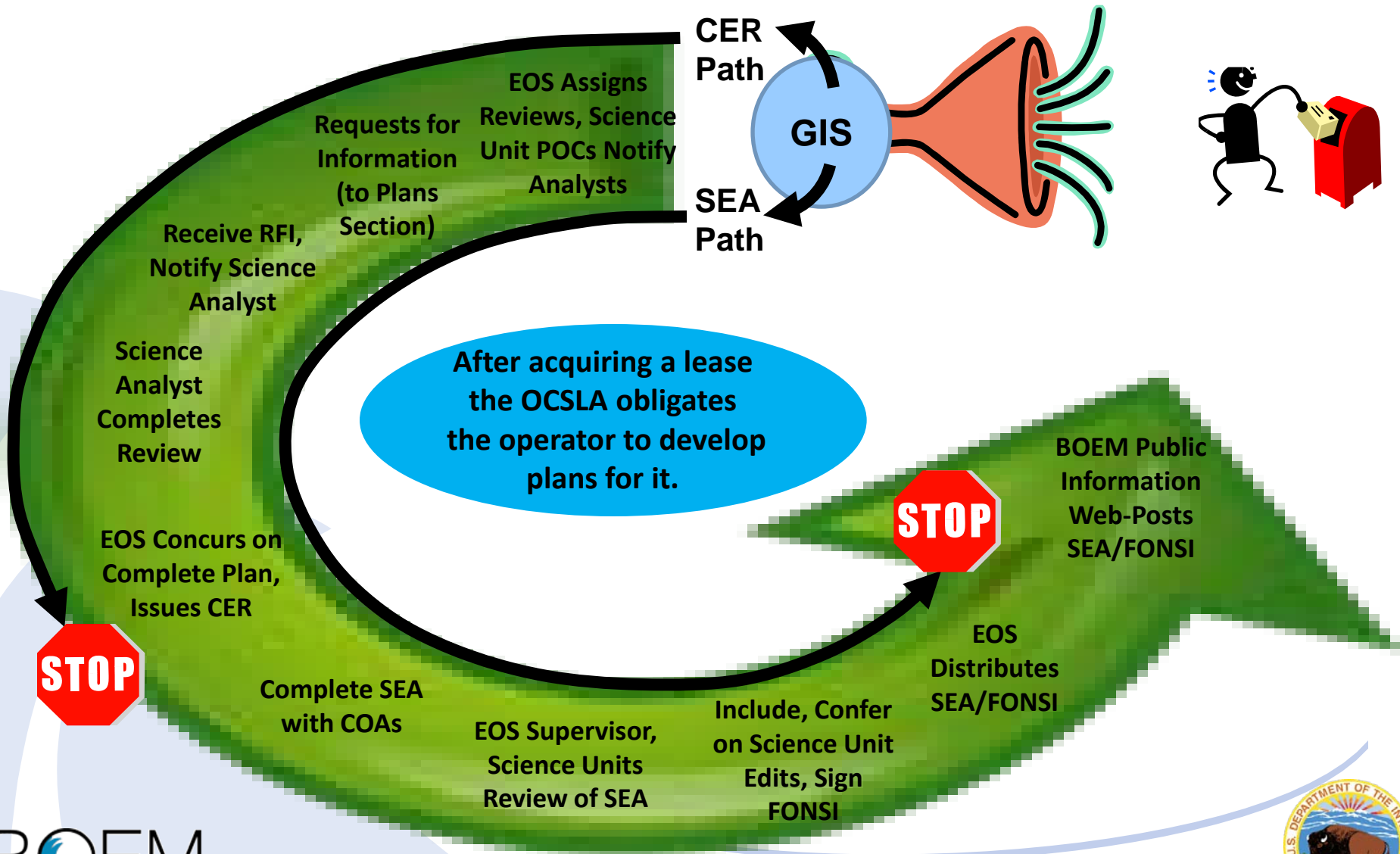
Pipeline transporting HC's with >500 ppm of H<sub>2</sub>S

Structure Removals

Activities proposing the use of New or Unusual Technology

\*Deepwater = > 500' water depth in the GOM and a subsea BOP or a surface BOP on a floating facility.

# Process for OCS Plans



# Plan Review and Decision Process

## Deemed Submitted Review

EPs must include:

- Details of the proposed activities
- Drilling locations
- Schedule of activities
- Description of equipment
- Environmental safeguards
- Oil spill information
- Onshore support facilities

# Plan Review and Decision Process

## Deemed Submitted Review

BOEM approves DPPs/DOCDs for the following additional activities:

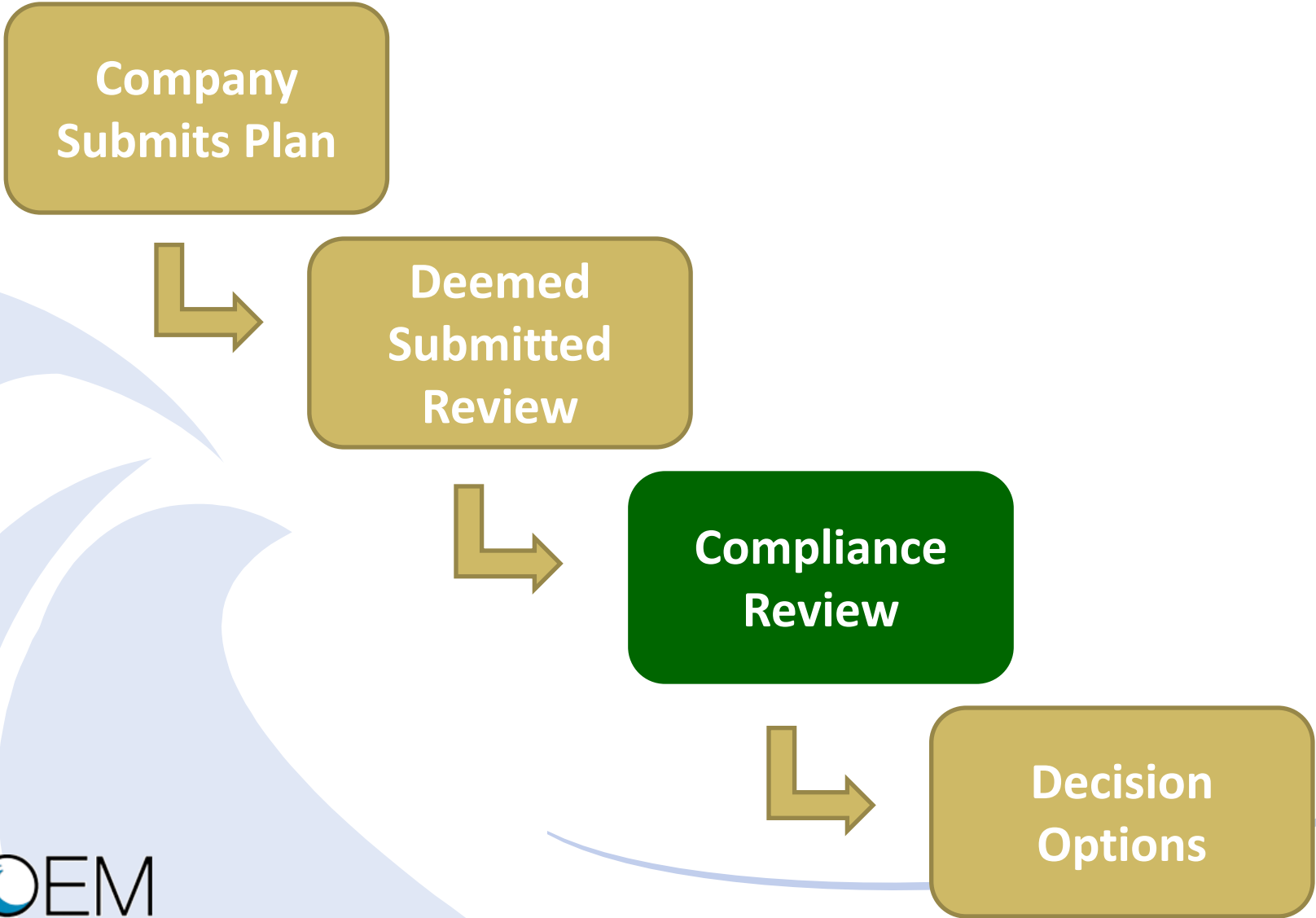
- Platform and related equipment location(s)
- Development drilling and production
- Production transportation systems

DPPs/DOCDs must include a description of:

- Activities to be performed
- Facilities and operations
- Environmental safeguards
- Safety standards
- Schedule
- Oil spill information
- Onshore support facilities



# Plan Review and Decision Process



# Plan Review and Decision Process

## Compliance Review

Within 2 working days after a plan has been deemed submitted, BOEM sends a public information copy of the plan to the following:

- The Governor and Coastal Zone Management Act (CZMA) agency of each affected State
- The BOEM website
- The website [www.regulations.gov](http://www.regulations.gov) for 10 days when an Environmental Assessment is required
- National Marine Fisheries Service (NMFS)
- Other applicable federal agencies

# Plan Review and Decision Process

## Compliance Review

- 30 calendar day review period for an EP
- 60 calendar day review period for a DOCD or DPP after:
  - The comment period closes for the Governor, local government, and general public
  - The final Environmental Impact Statement (EIS) for a DPP is released or adopted
  - The last amendment to the proposed activities is received
- If an operator submits amendments after a plan is deemed submitted, the process restarts

# Plan Review and Decision Process

## Compliance Review

**Review of the following information is completed:**

- NEPA Review and Coordination
- Air and Water Quality
- Archaeological
- Benthic and Biological
- Marine Minerals
- Geological and Geophysical Data
- Worst Case Discharge Review and Verification
- Oil Spill Information
- Lease Designation(s) and Company Bonding

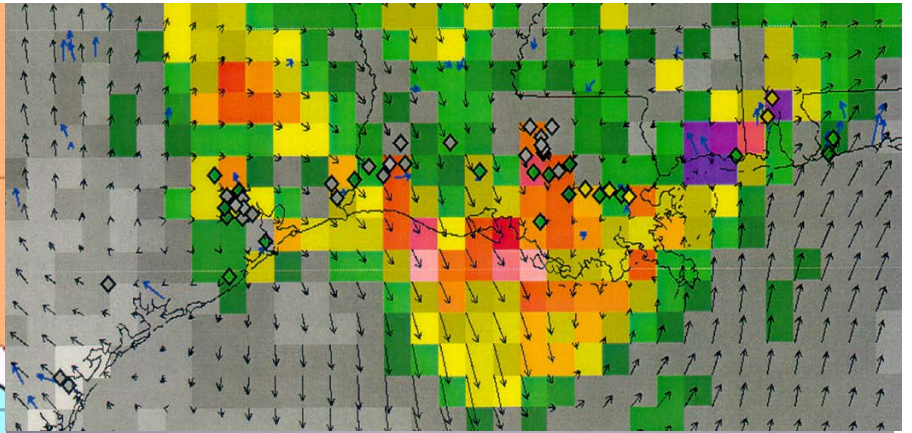
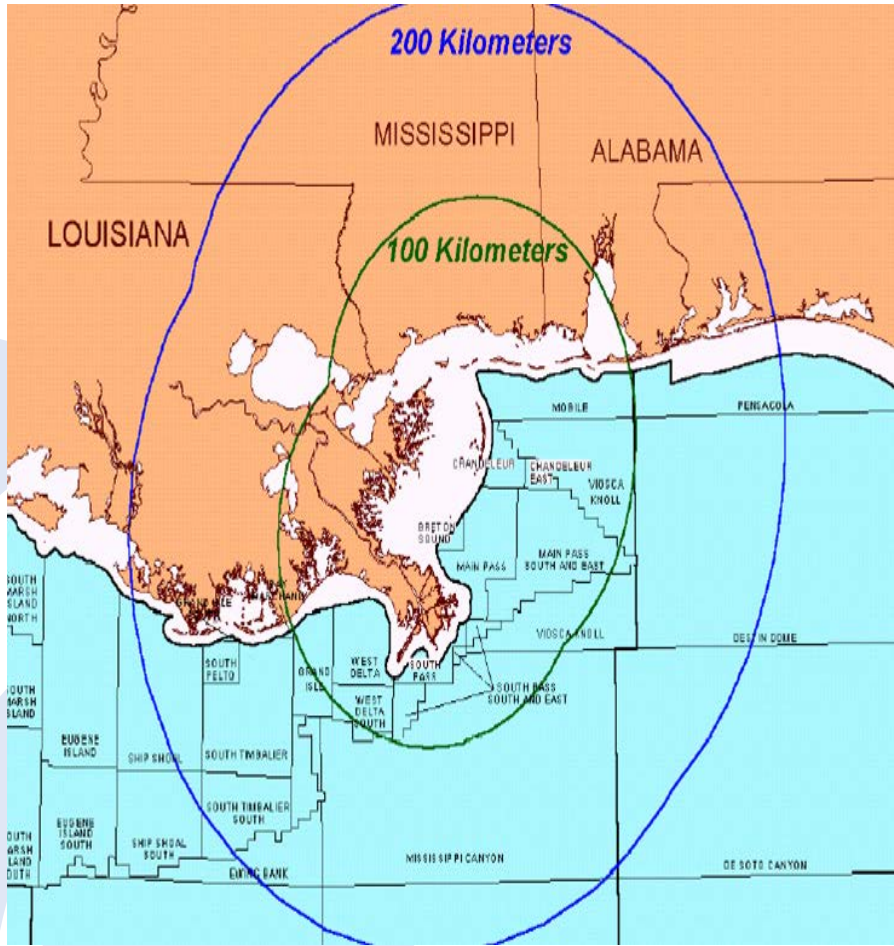
# Plan Review and Decision Process

## Compliance Review

**Review of the following information is completed:**

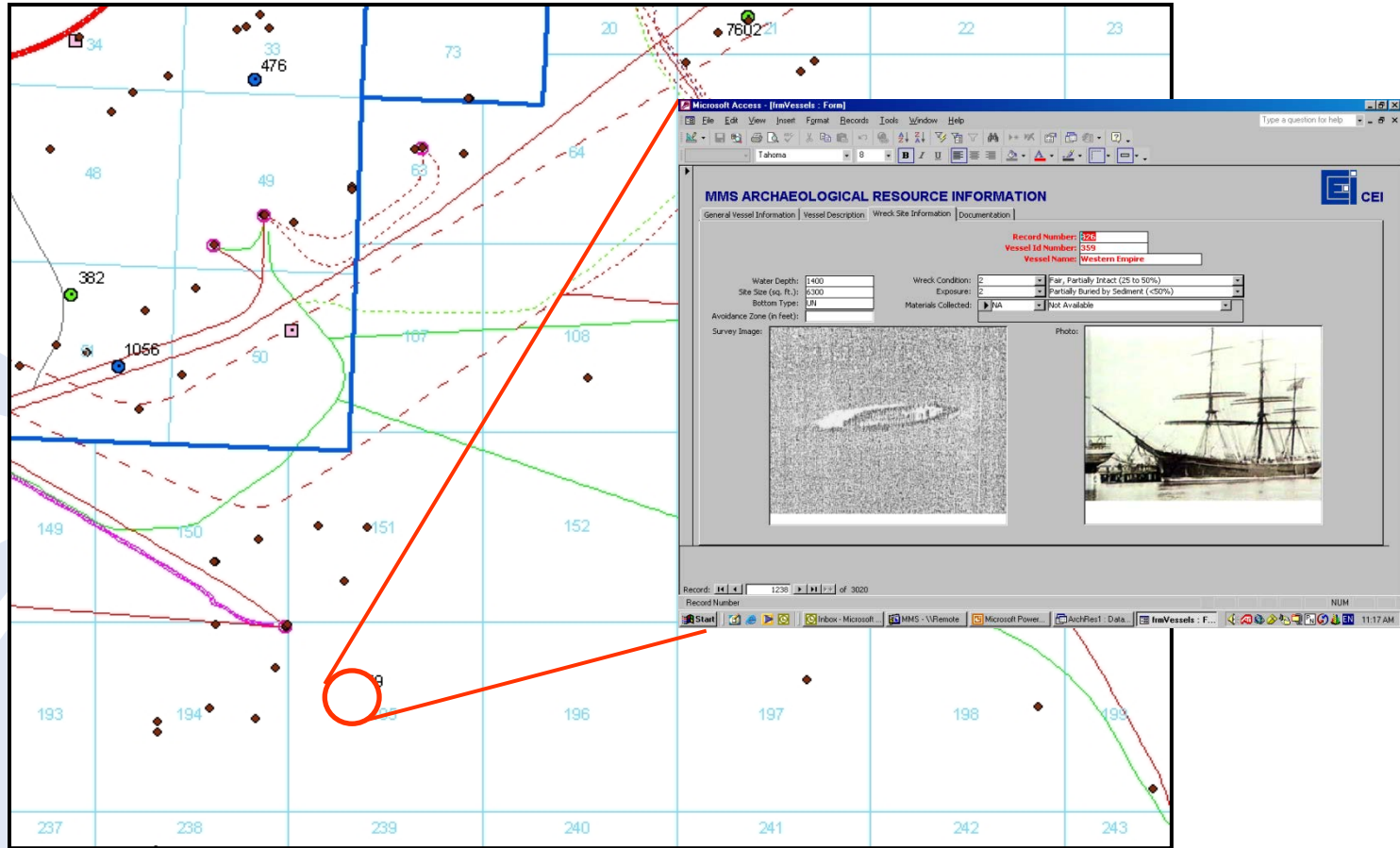
- NEPA Review and Coordination
- Air and Water Quality
- Archaeological
- Benthic and Biological
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# Air and Water Quality Reviews



Ensure operator is within air emission exemption limits.

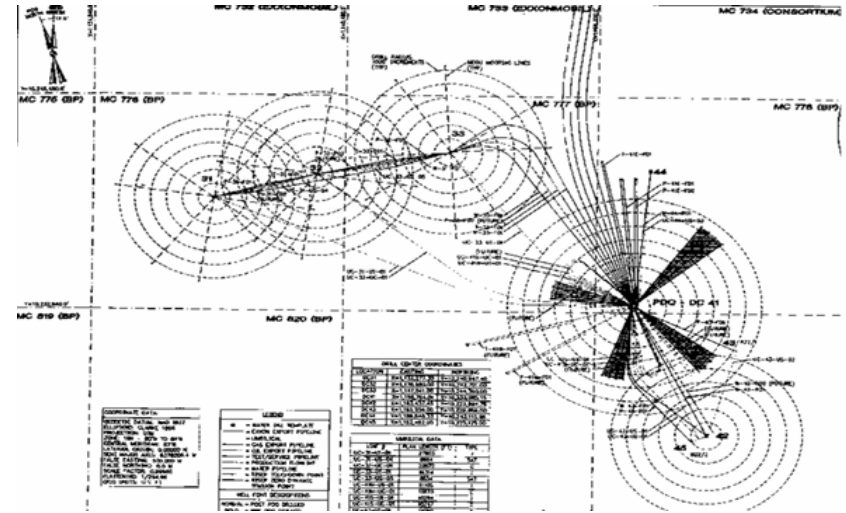
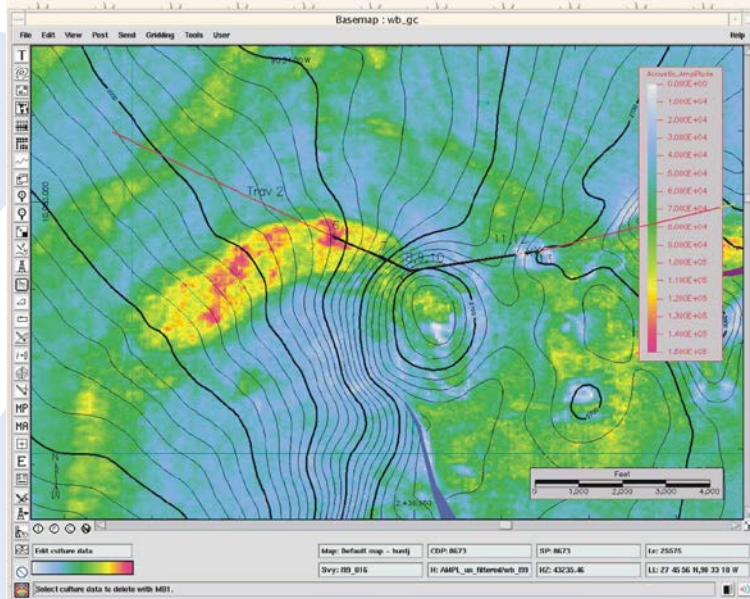
# Archaeological Reviews



Historical resources are identified to avoid contacts.

# Benthic and Biological Reviews

Avoidance in Conditions of Plan Approval is a key mitigation strategy



*Madrepora oculata*  
and gorgonian at depth  
of 4,800 ft Green  
Canyon 852



Sensitive biological areas are protected from bottom disturbances.



# Marine Minerals Reviews



Designated lease blocks with significant sand resources.

# Plan Review and Decision Process

## Compliance Review

**Review of the following information is completed:**

- NEPA Review and Coordination
- Air and Water Quality
- Archaeological
- Benthic or Biological
- Marine Minerals
- Geological and Geophysical Data
- Worst Case Discharge Review and Verification
- **Oil Spill Information**
- Lease Designation(s) and Company Bonding

# Oil Spill Information Evaluation

Plans Section Performs the following:

- ❖ Analyzes oil spill information including the Blowout Scenario and the Oil Spill Response discussion
- ❖ Ensures calculated WCD volume is sufficiently covered by an approved and/or revised Oil Spill Response Plan (OSRP) for the activities proposed in the plan
- ❖ Coordinates with NMFS and Affected Coastal State Agencies
- ❖ Consults with BSEE Oil Spill Preparedness Division (OSPD)
- ❖ Discussion between BOEM and BSEE initiated when the Plan WCD Scenario > OSRP

# Oil Spill Information Helpful Tips

- ❖ Oil Spill Information should include the most recently Approved OSRP and the date approved
- ❖ Oil Spill Information should also include the date of the most recently submitted update to the OSRP and status of submittal (i.e., In Compliance, No Further Action, Approve)
- ❖ The following Submittal Types should be used: Initial, OSRP Revision, OSRP Biennial Update, and Non-Regulatory Update
- ❖ Plans Section will validate that the last OSRP submittal does not affect the Worst Case Discharge Volume in relation to the Plans WCD Scenario

# Oil Spill Information Helpful Tips

Submittal ID	Submittal Type	Revision #	Status	OSRP Name
<input type="text"/>	<input type="text" value="contains..."/>	<input type="text"/>	<input type="text" value="contains..."/>	<input type="text" value="contains..."/>
<a href="#">11385091</a>	Government Initiated ...	64	Internal Draft	
<a href="#">11380681</a>	OSRP Revision	64	Approve	
<a href="#">11228552</a>	Operator Exercise	63	Pass	
<a href="#">11227736</a>	Other Exercise	63	Withdrawn	
<a href="#">10715836</a>	OSRP Revision	63	In Compliance	
<a href="#">10715801</a>	OSRP Revision	62	Revision Required	
<a href="#">10715758</a>	Non-regulatory update	61	Revision Required	
<a href="#">10715714</a>	OSRP Revision	60	No Further Action	
<a href="#">10715671</a>	OSRP Biennial Update	59	In Compliance	
<a href="#">10956968</a>	Operator Exercise	63	Pass	
<a href="#">10715624</a>	OSRP Revision	58	In Compliance	
<a href="#">10715580</a>	OSRP Revision	57	Revision Required	

		Location Code	Facility Type	Product Code	Expiration Date
		<input type="text" value="contains..."/>	<input type="text" value="contains..."/>	<input type="text" value="contains..."/>	<input type="text" value="mm/dd/yyyy"/>
		<b>Production &gt; 10 miles</b>	<b>Federal</b>	<b>Crude Oil</b>	
		Production < 10 miles	Federal	Crude Oil	
		Drilling > 10 miles	Federal	Crude Oil	

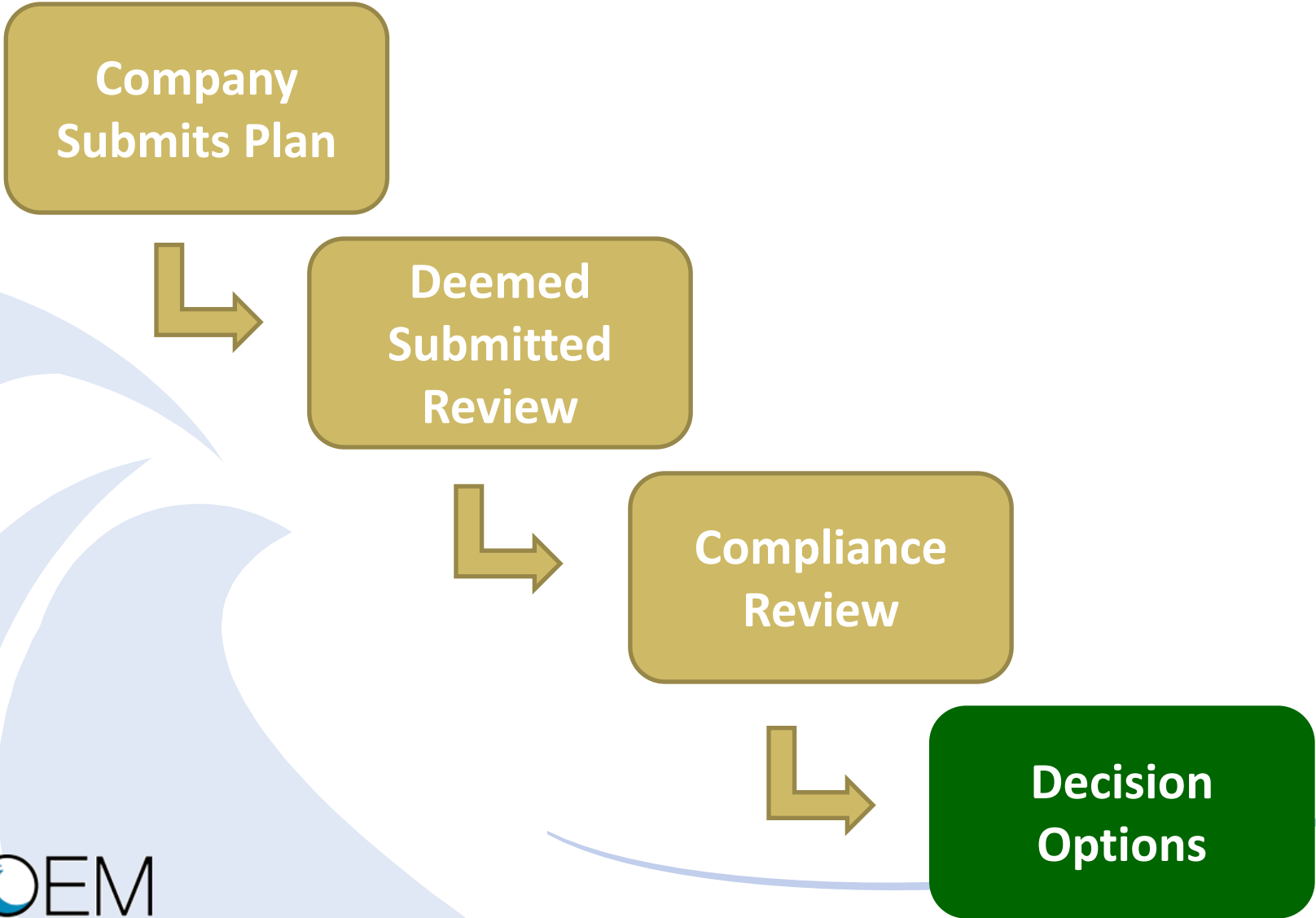
# Plan Review and Decision Process

## Compliance Review

### External Agencies Consulted:

- Coastal Zone Management Act (CZMA) Agencies
- Governor's Office of Coastal States
- National Marine Fisheries Service (NMFS)
- Fish and Wildlife Service (FWS)
- Flower Garden Banks National Marine Sanctuary
- Eglin Air Force Base

# Plan Review and Decision Process



# Plan Review and Decision Process

## Decision Options

For an EP, DPP, or DOCD the Regional Supervisor will:

- Approve the Plan
- Require the Company to Modify
- Disapprove the Plan



Thank you very much for the opportunity to speak with you!

Michelle Uli Picou  
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Contact: [michelle.picou@boem.gov](mailto:michelle.picou@boem.gov)

