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June 4, 1984

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Shell California Production, Inc.  
Attention: Mr. John Hallett  
P. O. Box 11164  
Bakersfield, CA 93389-1164

Re: Beta Unit, Platform Eureka

Gentlemen:

Shell California Production, Inc.'s Development and Production Plan calling for the installation of Platform Eureka on Lease OCS-P 0301 (Shell's third platform in the Beta Unit), with associated subsea pipelines to Platform Ely on adjacent Lease OCS-P 0300, was deemed submitted on March 14, 1984. An in-depth environmental review of Shell's Plan has been made, resulting in the preparation of an Environmental Assessment. Based on this environmental review, we have concluded that the Plan does not constitute a major Federal action significantly affecting the quality of the human environment. An in-depth technical review of the Plan was also undertaken, resulting in our conclusion that the Plan is based on sound engineering and scientific principles. On May 9, 1984, the California Coastal Commission concurred with Shell's consistency certification which states that the proposed activities will be conducted in a manner consistent with California's Coastal Management Program.

Accordingly, since the Plan is technically and environmentally sound, Shell's Development and Production Plan is hereby approved, subject to the following conditions:

- 1.) The requirements detailed in our May 16, 1984 letter, subject: Requirements for Platform Installation and Commencement of Operations, are to be met.
- 2.) During installation of the platform and pipelines, Shell is to avoid the potential cultural feature identified as "Feature A" in the "Cultural Resource Assessment for the Beta Intrafield Pipeline Route and Eureka Platform Site" report and the rocky outcrops located south of the platform site. Submittal of anchor mooring plans to the Regional Supervisor, Field Operations Office prior to such installation is necessary.
- 3.) As Shell is aware, submittal of a separate, formal pipeline right-of-use-and-easement permit application is not needed for the two subsea pipelines to transport wet oil and wet gas from Eureka to production facilities on Ely. The requirements outlined in OCS Order No. 9 must still be met, however, and the detailed information specified therein should be submitted

SHELL CALIFORNIA PRODUCTION, INC.

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to this office as soon as possible. (Please note that a continuous volumetric comparison leak detection system is necessary for the oil line from Eureka to Elly. In addition to that presently in place for the Elly-to-shore pipeline.)

We want to commend Shell for its willingness to work closely with us during the review of this project and the effort put forth, especially that by Mr. John Hallett.

Sincerely,

*Thomas W. Dunaway*

Thomas W. Dunaway  
Regional Supervisor  
Field Operations Office

bcc: FILE: Beta Unit, POD Corres.

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Ops. Rev. & Appr.

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