

Adams	MM 9-20-85
Ahlgren	
Dunaway	
Lee	9-20/85
Mason	
Sarwar	
Schroeder	
Shackell	CC 9-20-85
Tudor	
Van Auker	
Jones	MM 9-20-85
RS, OL&E	
RS, ORE	

September 20, 1985

150

Exxon Company, U.S.A.  
 Attn: Mr. Donald E. Cornett  
 P. O. Box 5025  
 Thousand Oaks, CA 91359-5025

Re: Santa Ynez Unit  
 Development and Production Plan

Gentlemen:

Exxon Company, U.S.A.'s Development and Production Plan (DPP) for the Santa Ynez Unit was deemed submitted pursuant to 30 CFR 250.34 on December 27, 1982. The DPP, updated in June 1985, calls for three or four additional platforms in the Santa Ynez Unit and covers two crude oil treatment and storage options: A--oil to be treated on the existing OS&T, and B--oil to be transported by pipeline to new onshore oil treating facilities in Las Flores Canyon and then to a marine terminal in State waters.

Project components for both options include the platforms, associated subsea pipelines and power cables, modifications to existing onshore gas facilities, and an ocean outfall. Option A components also include modifications to the existing OS&T, while Option B components include onshore oil treating facilities with a cogeneration power plant, and a Single Anchor Leg Mooring in State waters.

An in-depth environmental review of Exxon's Plan was performed, with the Minerals Management Service and State of California jointly preparing an Environmental Impact Statement/Report. 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 June 23, 1983, the California Coastal Commission (CCC) objected to Exxon's consistency certification for Option A while concurring with the consistency certification for the portion of Option B covering facilities in Federal waters. The certification for Option B's State waters/onshore facilities was withdrawn by Exxon at that time. Consistency review of this nearshore portion of Option B was resumed in March 1985. On August 30, 1985, the CCC concurred with the consistency certification.

The MMS hereby approves Option B of the Development and Production Plan, with conditions of approval corresponding to mitigation measures specified for adoption in the enclosed Record of Decision. However, if Exxon cannot obtain the necessary onshore permits in a reasonable and timely manner, the MMS would then consider Option A, again with conditions corresponding to adopted mitigation

measures, subject to resolution of the California Coastal Management Program consistency issue in favor of Exxon. Regardless of the above, the MMS favors Option B, with its corresponding greater rate of production, because it more strongly fulfills the mandate of the OCS Lands Act, as amended, for prompt and efficient development of the Nation's natural resources.

This approval is granted with the following conditions:

- ° Exxon shall adhere to the requirements detailed in our May 27, 1983 letter, subject: Requirements for Platform Installation and Commencement of Operations.
- ° The DPP approval herein does not constitute a final approval of the pipeline system nor a waiver of pipeline permitting requirements. Review of pipeline details, including the subsea tie-in, is still proceeding.

(The remaining conditions of approval are based on various environmental impact mitigation measures identified in the aforementioned EIS/R and adopted by the MMS after a feasibility review.)

1. Exxon shall modify its Oil Spill Contingency Plan to address the incidental take provisions of the U. S. Fish and Wildlife Service Biological Opinion on endangered species (Record of Decision, pp. 57 and 58.)
2. Exxon shall utilize offshore construction techniques that minimize or avoid potential environmental impacts, such as turbidity.
3. Exxon shall remove construction equipment as soon as practicable after installation operations.
4. Exxon shall use a Fisheries and Wildlife Training Program for all offshore personnel.
5. Exxon shall use vapor balance lines during loading operations at the Marine Terminal.
6. Exxon shall use a vapor recovery system on all non-floating roof storage tanks and storage vessels.
7. If Exxon proceeds with the two-platform option for development of the Pescado Field, then additional surveying will be required in connection with the Pescado B-1 (OCS-P 0183) platform. At such time, the MMS will provide additional specifics with respect to coverage and then determine, for subsequent operations, the necessary radius of avoidance around potential cultural resources.
8. a. Exxon shall submit an Operations Curtailment Plan which lists conditions (weather and other constraints) under which pipelaying operations will not proceed.  
b. Exxon shall conduct post-installation geophysical surveying over the area of platform and pipeline installation operations and submit a side-scan sonar mosaic with survey results.

- 9. Exxon shall plan final pipeline routing to avoid and/or minimize all potential adverse impacts, including such impacts from falling objects.

We commend Exxon for its willingness to work closely with us during review of the Santa Ynez Unit project and its efficient development of this vital natural resource in a manner which takes into consideration the Nation's energy needs while assuring protection of the environment.

Sincerely,

*Thomas W. Dunaway*

Thomas W. Dunaway  
Regional Supervisor  
Office of Field Operations

Enclosure

- bcc: FILE: Santa Ynez Unit, DPP Corres.  
Chron  
RD  
RS, OL&E  
DS,V  
DS, SM  
C,ORA  
ELEE

OFO:ELe:fjj:Disk 26:Doc.18:9-20-85