

Adams	11-17-86
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Lee, E.	
Lee, S.	
Mason	
Sarwar	
Shackell	
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RS, OL&E	
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NOV 14 1986

Mr. Clair Ghylin  
Chevron U.S.A. Inc.  
P. O. Box 5050  
San Ramon, California 94583-0905

Re: Development and Production Plan,  
Platform Gail, Lease OCS-P 0205,  
Santa Clara Unit

Dear Mr. Ghylin:

Chevron U.S.A. Inc.'s Development and Production Plan, which provides for the installation of Platform Gail on Lease OCS-P 0205 with associated subsea pipelines to existing Platform Grace on Lease OCS-P 0217, was deemed submitted pursuant to 30 CFR 250.34 on January 29, 1986. On July 8, 1986 the California Coastal Commission objected to Chevron's consistency certification. Findings were adopted by the Commission on July 10, 1986.

On July 15, 1986 Chevron filed an amended version of the above Plan with the MMS which was deemed submitted pursuant to 30 CFR 250.34 effective July 15, 1986, and transmitted to the Commission that day for initiation of consistency review. At the September hearing, the Commission again voted to object to Chevron's consistency certification. The Commission failed to adopt findings on its vote to object to the Amended Plan at any time prior to October 15, 1986.

An in-depth environmental review of Chevron's Plan has been performed, with the MMS preparing an Environmental Assessment covering development activities in the Santa Clara Unit's Sockeye Field. National Environmental Policy Act (NEPA) requirements have been fulfilled by completion of an Environmental Assessment (EA). The EA has resulted in a determination of a Finding of No Significant Impact (FONSI). An in-depth technical and engineering review of the Plan has also been performed. The Plan is based upon sound engineering and scientific principles. Chevron's Plan thoroughly fulfills, and in some instances exceeds, our regulatory requirements.

Mr. Clair Ghylin

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Accordingly, the Plan is environmentally and technically sound and meets the appropriate regulatory requirements. Chevron's Development and Production Plan is hereby approved, subject to the enclosed conditions.

Sincerely,

*Thomas W. Dunaway*

Thomas W. Dunaway  
Regional Supervisor  
Office of Field Operations

**Enclosure**

bcc: FILE Santa Clara Unit DPP Corresp., Lease OCS-P 0205  
Chron  
RD  
RS/OLE  
DS/Ventura  
C/ORR  
J. Van Auker

Urich Disk 7, Document 53

Conditions of Approval  
Development and Production Plan  
Platform Gail, Lease OCS-P 0205, Santa Clara Unit

\_\_\_\_\_  
[Date]

Chevron's DPP is subject to the following six conditions:

1. In accordance with the regulations of the Channel Islands National Marine Sanctuary (15 CFR 935.6(b)), Chevron shall maintain at Platform Gail the following equipment: (a) 1500 feet of open ocean containment boom and a boat capable of its deployment; (b) an oil skimming device capable of open ocean use at either Platform Gail or Grace; and (c) 15 bales of oil sorbent material.
2. Chevron shall participate in an oil spill exercise proximal to Anacapa Island.
3. In accordance with the Biological Opinion resulting from the Endangered Species Act (ESA) Section 7 consultation with the U. S. Fish and Wildlife Service (FWS), MMS will require Chevron to modify the Oil Spill Contingency Plan for Platforms Gail and Grace to further protect listed species pertinent to the proposed project. The required modifications include: (a) the use of maps (at a scale of 1:48,000 or larger) illustrating environmentally sensitive areas, especially endangered species habitats, and (b) the development of an endangered species oil spill avoidance plan, designed to result in listed species avoiding an oil spill. The oil spill avoidance plan shall be developed in association with the FWS and the California Department of Fish and Game.
4. Chevron will prepare and submit to MMS for approval prior to initiation of drilling activities a Performance Plan to document source testing of actual air emissions from operation of equipment (including platform turbines) at Platform Gail.
5. Chevron will prepare and submit to MMS for approval prior to initiation of drilling activities an Inspection and Maintenance (I & M) program for operations at Platform Gail. This program is intended to reduce fugitive hydrocarbon emissions and shall be consistent with prudent operating practices at Platform Gail.
6. With respect to installation procedures, Chevron shall:
  - i. Submit an Operations Curtailment Plan which lists conditions (weather and other constraints) under which platform installation and pipe-laying operations will not proceed;
  - ii. Submit detailed anchoring plans; the corridors for anchor placement during installation procedures shall be selected

to minimize impacts to hard bottom features to the maximum extent possible; and

- iii. Conduct post-installation geophysical surveying over the area of operations and submit a side-scan sonar mosaic with survey results.
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