



United States Department of the Interior

MINERALS MANAGEMENT SERVICE
PACIFIC OCS REGION
1340 WEST SIXTH STREET
LOS ANGELES, CALIFORNIA 90017



In Reply Refer To:
MMS—Mail Stop

150

Exxon Company, U.S.A.
Attention: Mr. G. T. Theriot
P.O. Box 5025
Thousand Oaks, CA 91359-5025

Adams	<i>Mba 4-4-88</i>
Ahlgren	
Dunaway	
Lee	<i>SA 4/4/88</i>
Mason	
Mitchell	
Sarwar	
Shackell	
Van Auker	
Graham	
Jones	<i>for S.J.J.</i>
RS, OL&E	<i>for S.J.J. 4/4/88</i>
RS ORE	

April 4, 1988

Re: Santa Ynez Unit Revised Development
and Production Plan

Dear Sir or Madam:

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, called for three or four platforms in the Santa Ynez Unit and contained two crude oil treatment options: A--offshore, and B--onshore. On June 23, 1983, the California Coastal Commission concurred with Exxon's consistency certification for the portion of Option B covering facilities in Federal waters. The CCC concurred with the consistency certification for the nearshore portion of Option B on August 30, 1985. On September 20, 1985, the Minerals Management Service (MMS) approved Option B of the DPP.

On September 29, 1987, Exxon Company, U.S.A.'s revised DPP, which provides for the installation of three platforms (Harmony, Heritage and Heather) in the Santa Ynez Unit with associated subsea pipelines to facilities in Las Flores Canyon, was deemed submitted pursuant to 30 CFR 250.34.

The California Coastal Commission received the DPP revision from the MMS on December 22, 1987. On January 15, 1988, the California Coastal Commission agreed with its Executive Director's determination that no additional consistency review of Exxon's DPP revision is required.

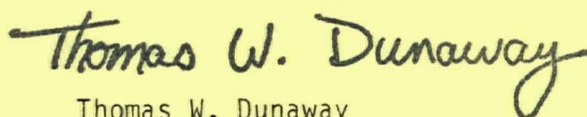
A detailed environmental evaluation of Exxon's revised plan has been performed, with this agency preparing an Environmental Assessment (EA) covering the revised DPP. The National Environmental Policy Act (NEPA) requirements have been fulfilled by completion of the EA and its accompanying Finding of No Significant Impact. An in-depth technical review of the plan has also been performed. The plan is based upon sound engineering and scientific principles. Exxon's plan thoroughly fulfills, and in some instances exceeds, our regulatory requirements.

Accordingly, the revised DPP is environmentally and technically sound and meets the appropriate Department of the Interior regulations. Exxon's revisions to the DPP are hereby approved, subject to the enclosed conditions.

Our September 20, 1985 approval of Option B of the DPP contains eleven conditions (copy of approval letter enclosed). That approval still stands.

We commend Exxon for its willingness to work closely with us during review of this project. We appreciate your cooperative efforts toward development of this vital energy resource in a manner which takes into account our Nation's domestic energy needs while ensuring protection of the environment.

Sincerely,



Thomas W. Dunaway
Regional Supervisor
Office of Field Operations

Enclosure

bcc: File: Santa Ynez Unit, DPP Corr. (all bcc's w/o encl.)
Chron
RD
RS,OLE
DS,V
DS,SM
C,ORA
ELee
JVanAuker

OFO:EL/JVA Disk EL III

Conditions of Approval
Revised Development and Production Plan
Santa Ynez Unit

1. Exxon shall adhere to the requirements our September 20, 1985 DPP approval letter and our May 27, 1983 letter, Subject: Requirements for Platform Installation and Commencement of Operations.
2. Exxon shall submit to the MMS for review and approval any additional amendments to its revised DPP during the life of the project. The MMS will consider all aspects related to any such change and will conduct a thorough NEPA and technical review.
3. Prior to any curtailment or shut-in of OCS operations, Exxon shall submit to the MMS for review and approval plans and reasons for the action. Prior approval is not required for emergency situations.
4. Exxon shall submit to the MMS for review and approval plans and scheduling covering shutdown and removal of the Offshore Storage and Treatment vessel (OS&T), no later than six months prior to implementation.
5. Exxon shall submit to the MMS within nine months from the date of this approval a plan showing compliance with MMS procedures for the protection of potential cultural resources as agreed upon in the consultation with the California State Office of Historic Preservation (summarized in Record of Decision).
6. Exxon shall submit detailed anchoring plans to the MMS for review and approval no later than six months prior to jacket installation; anchor placement during installation procedures shall be selected to minimize impacts to hard bottom features to the maximum extent possible.
7. Exxon shall conduct post-installation geophysical surveying over the area of platform installation operations and submit to the MMS a side-scan sonar mosaic with survey results. Exxon shall submit a survey plan to the MMS for review and approval no later than three months prior to installation. The results of the survey shall be submitted to the MMS no later than three months after installation is completed.
8. Exxon shall notify the MMS Ventura District of any inspections on OCS facilities by representatives of State or local agencies, with sufficient lead time to allow MMS personnel to be present.
9. Exxon shall submit to the MMS for review and approval a schedule for start-up of production no later than six months prior to start-up.
10. Exxon shall expeditiously seek approval of transportation modes handling Santa Ynez Unit production at rates greater than 100,000 BOPD when necessary.
11. For OCS facility abandonment, Exxon shall submit to the MMS for review and approval plans to remove the platforms and equipment in accordance with the applicable MMS regulations in force at that time.

12. Exxon shall submit to the MMS for review and approval any plans to reinject produced water into the Santa Ynez Unit reservoirs, for the purpose of disposal or pressure maintenance.
13. Exxon shall submit for review and approval annual updates to the Oil Spill Contingency Plan for the Santa Ynez Unit. The plan shall cover procedures, equipment and techniques as required by the MMS, in cooperation with the U.S. Coast Guard.
14. Exxon shall consult with the MMS during preparation and execution of the existing Marine Construction Mitigation Plan (also referred to as the construction impact reduction plan), to the extent that marine resources on the OCS may be impacted by construction.
15. Exxon shall submit to the MMS for review and approval, within one year after the date of this revised DPP approval, a schedule covering installation of Platform Heather.
16. Exxon shall prepare and submit to the MMS for approval, at least six months prior to initiation of drilling activities, a Performance Plan to verify and document actual emissions from equipment on the new platforms.
17. Exxon shall prepare and submit to the MMS for approval at least six months prior to initiation of drilling activities an Inspection and Maintenance Program for operations on the new platforms. The program will be implemented 30 days after the start of development drilling. The program shall detail the following:
 - a. Method(s) of leak detection to be employed.
 - b. Frequency of inspection and maintenance for various component types.
 - c. Definition of emission/concentration threshold levels to be used to trigger repair or replacement.
 - d. Time allowed between leak detection and repair or replacement.
 - e. Record-keeping procedures including I&M logs.
 - f. Format for monthly report to MMS detailing inspection, maintenance, and repair or replacement activities.
18. Exxon shall also comply with the requirements for quarterly reporting of air emissions for each facility in accordance with our January 29, 1986 letter.
19. Flaring will be allowed only in emergency situations or for short periods of time when approved by the MMS. Exxon shall design and construct its OCS facilities to minimize flaring and maximize oil production during non-routine, non-emergency situations including cutback or interruption in sales gas deliveries.
20. Exxon shall submit to the MMS flaring reports on a monthly basis, including detailed information on both emergency and non-emergency events. The following information is to be included in the flaring reports: time of flaring event, volume of gas flared, duration of the event, estimated sulfur content of the gas, cause of the flaring event, and remedial measures.

21. Exxon shall consult with the MMS in the preparation and implementation of the nearshore Construction Air Pollution Curtailment Plan.
22. Exxon shall submit to the MMS information on projected production rates for each Santa Ynez Unit platform, i.e. separate anticipated production curves and data in tabular form, within 45 days from the date of this approval.
23. Exxon shall submit to the MMS for review and approval the completed design specifications for the central process heaters proposed for the new platforms, within 45 days from the date of this approval.
24. Exxon shall submit to the MMS for review and approval the design of heli-decks for the new platforms within six months from the date of this approval.
25. Exxon shall resume submitting to the MMS monthly progress reports covering the Santa Ynez project starting in May 1988.
26. Exxon shall provide access to onshore facilities for MMS personnel for inspection purposes.