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Lee, E.
Mayes <i>MSM 8/28/92</i>
Moir
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RS, OLE <i>PM 8/28/92</i>
RS, ORE <i>MSM 8-28-92</i>

August 28, 1992

Mr. T. J. Tibbitts
 Regulatory Affairs Manager
 Production Department, Western Division
 Exxon Company, U.S.A
 P.O. Box 5025
 Thousand Oaks, CA 91359-5025

Re: Santa Ynez Unit
 Topside Installation,
 Platforms Harmony and Heritage

Dear Mr. Tibbitts:

By letters to this office dated June 15, and June 19, 1992, Exxon Company, U.S.A. (Exxon) submitted a request to install the topsides onto the previously installed Santa Ynez Unit (SYU) Platform Harmony and Heritage jackets in the Santa Barbara Channel. This operation is a continuation of the ongoing construction of the SYU Expansion Project and is projected to commence around mid-October 1992 and be completed by the end of December 1992. The topside work will be concentrated primarily in the vicinity of the Harmony and Heritage jackets and will mainly involve the setting of a number of topside modules onto the respective jackets using the derrick barge DB51. Other primary construction vessels involved in the topside installation will include a support tug/supply boat for the derrick barge, 8 transportation barges with the topside modules, 8 transportation tugboats, and an anchor handling tugboat.

In support of the topside proposal, Exxon submitted a number of technical and environmental documents to the Minerals Management Service (MMS) including a project description, a topside installation execution plan, a pre-hookup execution plan, an Environmental Mitigation Report (EMR), an oil spill contingency plan supplement and a post-construction survey plan. On June 23, 1992, the MMS mailed copies of the EMR to several State, Federal and local government agencies and other parties. Agencies that provided written comments were the National Marine Fisheries Service (NMFS), California Department of Fish and Game (CDFG), U.S. Coast Guard (USCG), Santa Barbara County Air Pollution Control District (SBCAPCD), and Santa Barbara County Resource Management Department (SBCRMD). Agency comments and recommendations including verbal recommendations from SBCRMD and the California Coastal Commission (CCC) have been incorporated into MMS conditions of approval for this project which are enclosed with this letter.

On July 31, 1992, Exxon submitted a revised anchor plan including anchor changes to support topside installation at Platforms Harmony and Heritage. These anchor changes will facilitate the initial anchor setting and allow flexibility in the event of inclement weather during the installation of the topsides. The changes included expanding most of the 500-foot radius anchor target zones to 1000-foot radius target zones to allow more flexibility in making minor field adjustments to compensate for sea conditions, currents and prevailing winds while setting the anchors. The changes also included adding two temporary (for less than 1 day) 500-foot radius anchor target zones each at Harmony and Heritage to assist in properly setting the anchors in the construction anchor zones and two 1000-foot radius target anchor zones each at Heritage and Harmony as inclement weather contingencies for topside installation.

In a telecon between MMS and the CCC staff on August 26, 1992, the CCC requested that the topside installation anchor scope be limited to the same anchor scope that was used for the 1989 Harmony and Heritage jacket installation (which was within a 7300-foot radius of the jackets) or that additional documentation be provided to the CCC supporting the expanded anchor scopes (i.e. beyond a 7300-foot radius of the jackets) proposed in Exxon's July 31, 1992 revised anchor plan. After consulting with Exxon, the MMS is limiting Exxon at this time to the anchor target zones within a 7300-foot radius (see condition no. 11) pending further documentation to support the expanded anchor scope proposed in the July 31, 1992 revised anchor plan. MMS will continue to work with Exxon, the CCC and SBCRMD concerning the expanded radius (beyond 7300-feet) proposed by Exxon since this expanded radius will allow greater flexibility during anchor setting operations and will provide for greater safety by allowing minor field adjustments to be made to better compensate for sea conditions and prevailing winds.

The MMS has conducted an environmental review of Exxon's proposal. The MMS environmental review focused on potential impacts to air quality, water quality, marine biology (hard bottoms), cultural resources, commercial fishing, and marine mammals. From an environmental view point, we have determined that Exxon's proposed project will not result in any significant changes in the types or levels of environmental impacts analyzed in the 1984 Final Environmental Impact Statement/Report for SYU/Las Flores Canyon Development and Production Plan and subsequent environmental documents.

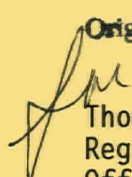
In addition to the environmental review, an in-depth technical and regulatory review of Exxon's proposal was conducted. The MMS review included consultation with our Office of Structural and Technical Support. Our review concludes that Exxon's topside installation proposal is based upon sound engineering and scientific principles and meets MMS regulations at 30 CFR 250 and other applicable regulations and requirements. Based on our review of Exxon's proposal, in particular the EMR, we have determined that the topside installation falls within the scope of the previously approved SYU Development and Production Plan and subsequent revisions.

Therefore, based upon our technical, regulatory and environmental review, Exxon's proposal for installation of the Platform Harmony and Heritage topsides as submitted in the documents listed above is hereby approved subject

to the enclosed conditions. This approval includes all anchor target zones or portions thereof proposed by Exxon in both the original and revised anchor plans which fall within a 7300-foot radius as measured from the center of each jacket. However, Exxon shall not commence installation of the platform topside structures onto the respective jackets until the topside fabrication report prepared and submitted by the Fabrication Certified Verification Agent (Tokola Offshore, Inc.) for that platform has been approved by MMS. Exxon must also contact the MMS District Supervisor, Camarillo to obtain any additional approvals and/or to satisfy any other requirements that he may have before proceeding with the topside installation activities.

Sincerely,

Orig. Sgnd. By Nabil F. Masri


Thomas W. Dunaway
Regional Supervisor
Office of Field Operations

Enclosure

cc: Chief, Office of Structural and Technical Support
Tokola Offshore, Inc.
California Coastal Commission
Santa Barbara County RMD
Santa Barbara County APCD
National Marine Fisheries Service
U.S. Coast Guard
California Department of Fish and Game

bcc: FILE: 1703-02a(1) DPP Corres., Santa Ynez Unit (w/encl.)
RD (w/encl.)
Chron (w/encl.)
DS/C (w/encl.)
RS/OLE <Attn: EOPS> (w/encl.)
C/POS (w/encl.)
S/OAEU (w/encl.)
S/PPPU (w/encl.)
J.Smith (w/encl.)
D.Panzer (w/encl.)
G.Shackell (w/encl.)

OF0: GShackell/pfm:pf:wp51:ltr:TOPINSYU.GS:08/10/92

Enclosure

Conditions of Approval
Platforms Harmony and Heritage Topside Installation
Santa Ynez Unit

August 28, 1992

1. Exxon shall contact the Port Safety Division of the U.S. Coast Guard Marine Safety Office, Los Angeles/Long Beach, at least two days in advance of the arrival of any transportation barges that might need to be prestaged in the harbor or in the vicinity of the Long Beach sea buoy and shall request staging in a specific area. The Port Safety Division can be reached at (310) 980-4455. Pertaining to the arrival and placement of the derrick barge, Exxon shall notify the Eleventh Coast Guard District Aids to Navigation Branch at least two weeks prior to the arrival and placement of the derrick barge. A local Notice to Mariners will be broadcast to apprise mariners of Exxon's operations in the Santa Barbara Channel. The Aids to Navigation Branch can be reached at (310) 980-4300, ext. 501. Exxon shall provide copies of all such notifications and related correspondence to the Regional Supervisor, Office of Field Operations (RS/OFO).
2. Exxon shall use ignition timing retard on all marine vessels where feasible, excluding the derrick barge. Two weeks prior to commencing construction activities, Exxon shall provide the RS/OFO a listing of all construction vessels to be used during the project indicating which vessels will be required by the Santa Barbara County Air Pollution Control District (SBCAPCD) to use ignition timing retard. For vessels without ignition timing retard, Exxon shall explain why the use of ignition timing retard is not feasible.
3. Exxon shall contact the Joint Oil/Fisheries Liaison Office (JOFLO) at least 2 weeks prior to commencement of any in-water activities to provide early notification to fishermen regarding the schedule for this project. Exxon shall provide the RS/OFO a copy of all notifications and related correspondence.
4. Exxon shall submit to the RS/OFO for review and approval a revised (4 copies) supplement to Exxon's Oil Spill Contingency Plan (OSCP) that reflects MMS suggested changes. This OSCP supplement shall be submitted at least two weeks before the topside installation operations commence and must be received and approved by the RS/OFO before construction activities commence. A copy of the approved OSCP supplement will be forwarded to the California Coastal Commission (CCC).
5. Exxon shall submit to the RS/OFO for review and approval a critical operations and curtailment plan (3 copies) for the derrick barge which will be used to install the topside modules. This plan shall identify weather and other constraints under which activities will either be curtailed or not proceed. This plan shall be submitted at least two weeks before the topside installation commences. A copy of the approved plan shall be available on site.

6. Exxon shall schedule a meeting(s) with their contractors prior to commencing topside installation activities to review: procedures for adhering to vessel traffic corridor lanes and setting and retrieving anchors; procedures that will be used to ensure that the anchors and anchor cables will not impact the pipelines and power cables or the potential cultural resource site southeast of Platform Heritage; protocols for reporting lost objects and recording the locations of these objects; methods for sighting and reporting marine mammals; the fisheries and wildlife training video and laws concerning marine mammals; protocols for emergency situations involving marine mammals; guidelines to avoid harassment of marine mammals; and procedures Exxon will take to heighten the awareness of their contractors concerning avoiding offshore conflicts with marine mammals. MMS representatives shall be invited to attend this meeting(s).
7. Exxon shall use the lease Sale 80 Western Oil and Gas Association (currently Western States Petroleum Association) Fisheries and Wildlife Training Program for all offshore personnel. Exxon shall ensure and document that all offshore personnel involved with the SYU topside construction activities are presented with this training program.
8. Exxon shall provide the District Supervisor, Camarillo (DS/C) a 48-hour advance notice of the commencement of topside installation activities. The following information shall be provided: projected time and date for commencement of each activity associated with topside installation; name of contractor and derrick barge; availability of heliport facilities on the derrick barge; approximate completion date of the installation; and other relevant information.
9. Exxon shall notify the RS/OFO of any changes or proposed changes to Exxon's topside installation proposal (including the schedule) as soon as it is known. Should the topside installation work extend beyond December 31, 1992, additional review and coordination with other government agencies, including the CCC and Santa Barbara County Resource Management Department (SBCRMD) will be needed. Additional mitigations or other requirements may also be needed.
10. All operational vessels and barges involved in this project shall comply with vessel traffic corridors established by the Joint Oil/Fisheries Committee. Copies of the vessel traffic corridor maps shall be available on all vessels.
11. Exxon shall set all anchors within the anchoring target zones approved for this project. Additionally, Exxon shall limit the scope for setting the anchors to a maximum 7300-foot radius as measured from the center of each jacket. All anchors shall be deployed using an anchor handling vessel equipped with a precision navigation system that has horizontal accuracy of at least plus or minus 3 meters. All anchors shall be vertically lowered and vertically raised into position to minimize seafloor scarring. All anchors and anchor cables shall also avoid impacting the pipelines and power cables and the potential cultural resource site 4600 feet southeast of Platform Heritage.

12. Exxon shall implement the cultural resources protection plan developed in consultation with the California Office of Historical Preservation and submitted to MMS by Exxon by letter dated February 6, 1989.
13. Helicopters will be used for some personnel transport according to page 4 of the Environmental Mitigation Report (EMR) project description. By letter to MMS dated July 10, 1992, SBCAPCD indicated that it would be necessary for Exxon to track and report to them helicopter emissions (including engine certification), stay within permitted emission limits, and provide the relative mitigation. Exxon shall comply with these requirements and provide copies of the certifications and all relevant emission reports to the RS/OFO.
14. Exxon shall not station more than two transportation barges at the SYU construction site without prior approval from the RS/OFO. Barges that arrive in the Southern California area before they are needed at the construction site shall stand by at staging areas in the vicinity of the Long Beach sea buoy or enter port as required by the U. S. Coast Guard. Barges shall be towed to the respective platforms along prescribed routes which follow the Santa Barbara Channel Shipping Lanes.
15. Exxon shall immediately notify the DS/C, JOFLO, CCC, and SBCRMD in the unlikely event that conflicts with commercial fishermen occur during construction activities, including conflicts associated with the transit of work boats, vessels, and barges between the construction site and shore.
16. Construction vessel captains shall immediately notify the Exxon on-site representative or compliance monitor in the unlikely event that physical contact, entanglement or other conflicts with marine mammals occur. The Exxon representative shall immediately make the following notifications in the order listed:

Marine Mammal Center Hotline:	(805) 687-3255
National Marine Fisheries Service (NMFS)	
Protected Species Division	
Jim Lecky	(310) 980-4015
Craig Wingert:	(310) 980-4021
Irma Lagomarsino	(310) 980-4016
after hours:	
Enforcement Division	(310) 980-4050
after hours recording:	(310) 980-4017
 MMS DS/C, Rishi Tyagi:	 (805) 389-7775

No conflicts with gray whales or other marine mammals are anticipated due to the localized nature of the construction work at the platforms, the relatively short duration of the project, and the fact that the schedule for completing the work does not overlap into the peak gray whale migration season. In the unlikely event that physical conflicts,

entanglements or other problems with gray whales occur during the topside installation activities, Exxon shall immediately prepare a gray whale monitoring plan. This plan shall be submitted to the RS/OFO. Exxon shall implement this plan as soon as it is approved by the MMS in consultation with NMFS, SBCRMD, and CCC.

17. Exxon shall submit to the RS/OFO for review and approval a gray whale monitoring plan by December 7, 1992. Exxon shall implement the monitoring plan on January 1, 1993 should the topside installation activities extend beyond that date. Exxon's plan will be reviewed and approved by MMS in consultation with NMFS, SBCRMD, and the CCC.
18. Exxon shall immediately notify the DS/C, if any object is lost during topside installation activities and shall provide the DS/C for review and approval a proposed plan of action to promptly locate and recover the lost object. Exxon shall record the locations of all lost objects and maintain a log of these lost objects on site.
19. Exxon shall comply with the provisions of the CCC-certified National Pollutant Discharge Elimination System (NPDES) Permit Numbers CA0110842 and CA0110851 and all other relevant NPDES permits for discharges from Platforms Harmony and Heritage.
20. Exxon shall continue their monthly progress reports to the RS/OFO. The monthly reports shall include information on the progress of all SYU-related offshore (including ongoing topside hookup which will continue after the topsides are installed) and onshore activities. Exxon shall also provide weekly progress reports to the DS/C concerning the progress of topside installation and hookup activities. In these reports, Exxon shall describe any instances where vessels have had to deviate from the vessel traffic corridors as required in condition #10.
21. Within 60 days of completion of the topside installation, Exxon shall submit to the RS/OFO a report (3 copies) describing the anchoring activities that were conducted during topside installation. The report shall include a map showing the proposed and actual anchor placement locations, pipelines, power cables, the 7300-foot radius identified in condition #11 and the potential cultural resource site southeast of Platform Heritage. The report shall include a record of all actual anchor locations in Lambert and Latitude/Longitude coordinates. The report shall also discuss any anchoring problems that may have occurred.
22. Within 60 days after completing the topside installation work, Exxon shall submit to the RS/OFO a detailed report (3 copies) describing the topside installation work performed and shall note any deviations from the proposed topside installation procedures.