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August 5, 1985

Union Oil Company of California  
 Attention: Mr. Richard S. Gillen  
 P. O. Box 6176  
 Ventura, California 93006

Re: Development and Production Plan--  
 Platform Irene, Point Pedernales  
 Field

Gentlemen:

Union Oil Company of California's Point Pedernales Field Development and Production Plan, which provides for the installation of Platform Irene on OCS-P 0441, with associated pipelines, a power cable and electrical substation, and an onshore treatment facility, was deemed submitted pursuant to 30 CFR 250.34 on September 4, 1984. An in-depth environmental review of Union's Plan was performed, with the Minerals Management Service and State of California jointly preparing an Environmental Impact Statement/Environmental Impact Report covering development activities in the central Santa Maria Basin, including this project. 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 January 22, 1985, the California Coastal Commission concurred with Union'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, Union's Development and Production Plan is hereby approved, subject to the following conditions:

- Union shall meet the requirements detailed in our September 7, 1984 letter, subject: Requirements for Platform Installation and Commencement of Operations.
- With respect to installation procedures, Union shall:
  - i. Submit an Operations Curtailment Plan which lists conditions (weather and other constraints) under which 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 any hard bottom features and cultural resources to the maximum extent possible.

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

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

1. a. Union shall replace one of the proposed diesel cranes on Platform Irene with an electric crane.

b. Union shall replace the proposed diesel dual pump cementing unit with an electric/diesel unit. Use of diesel power for this unit shall be confined to emergency situations and logged at the platform.

c. Union shall not test emergency generators during flaring episodes or when a supply boat is idling in the vicinity of the platform. Testing of the generators shall be logged at the platform.

2. Union shall instruct the oil spill cooperative Clean Seas, Inc. to modify the co-op's oil spill contingency plan by providing a more detailed analysis of how the Santa Ynez River mouth could be protected in the event of a spill.

3. Union shall install mechanical interlocks and associated instrumentation on the platform to reduce the probability of a pig launcher/receiver-related oil spill. Platform personnel shall be trained with respect to correct operating procedures and instrumentation monitoring in connection with the pig launchers/receivers.

4. a. Union shall give the MMS-approved fisheries training program, developed in connection with Lease Sale No. 53, to all offshore personnel associated with this project.

b. Union support vessels shall adhere to the established vessel traffic corridors.

This approval takes into account the project changes that have occurred since the DPP was deemed submitted, which are detailed in Union's July 15, 1985 letter to this office.

We commend Union for its willingness to work closely with us during review of the Point Pedernales Field project and its efforts leading to prompt and efficient development of this vital national resource in a manner which takes into consideration the Nation's energy needs while assuring protection of the environment.

Sincerely

Thomas W. Dunaway  
Regional Supervisor  
Office of Field Operations

DS/SM  
Chief /ORR/AS  
RD Chroob

bcc: FILE: 1 Ppt. Pedernales Field, OCS-P 0441, BPP Corres.

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