



# United States Department of the Interior

## BUREAU OF OCEAN ENERGY MANAGEMENT

Gulf of Mexico OCS Region  
1201 Elmwood Park Boulevard  
New Orleans, LA 70123-2394

In Reply Refer To: GM 235D

August 14, 2020

Ms. Sylvia Bellone  
Shell Offshore Inc.  
One Shell Square  
P.O. Box 61933  
New Orleans, Louisiana 70161-1933

Dear Ms. Bellone,

Reference is made to the following plan:

Control No. S-8008  
Type Supplemental Exploration Plan  
Received March 20, 2020, amended June 2, July 15 and 16, 2020  
Lease(s) OCS-G 19409, Block 815, Alaminos Canyon Area (AC)  
OCS-G 20871, Block 859, Alaminos Canyon Area (AC)

The Mineral Management Service, Alaminos Canyon Block 859 Unit Agreement Number is 754307006.

You are hereby notified that the approval of the subject plan has been granted as of August 14, 2020, in accordance with 30 CFR 550.233(b)(1).

This approval includes the activities proposed for Subsea Wells No. 2, No. 2 Alt1, No. 2 Alt2, SA006, SA006 Alt1, SA006 Alt2, SA007, SA007 Alt1, SA007 Alt2, SA008, SA008 Alt1, SA008 Alt2, SA009, SA009 Alt1, and SA009 Alt2 in AC Block 815.

In accordance with 30 CFR 556.901(d), additional security may be required for your proposed activities. Prior to conducting activities in which you need to obtain approvals and/or permits described in 30 CFR 550.281(a) from the appropriate District Manager or BSEE Regional Supervisor, you must contact BOEM Risk Management Operations Group by email at [boemrmog@boem.gov](mailto:boemrmog@boem.gov) to determine if additional security is required and comply with any demand for this security.

The projected NO<sub>x</sub> emissions amounts in your plan were calculated using historic fuel consumption rates. Maintain monthly records of the total annual fuel consumption for the drilling rigs and support vessels with a limit of 7,300,000 gallons/year for rigs and 3,621,804 gallons/year for vessels and provide the information to the BOEM Regional Supervisor, Office of Leasing and Plans, Plans Section (GM 235D) annually by February 1<sup>st</sup> of each year, beginning in the year 2021. If no activities were conducted during a calendar year, provide a statement to that effect in lieu of the required records. If at any time during your activities these records indicate that your NO<sub>x</sub> annual emissions may exceed the annual limit approved in your plan or the total annual fuel consumption limit, you must immediately prepare a revised plan pursuant to

30 CFR 550.283 to include the recalculated emissions amounts. You will not proceed with the actions that could cause the potential annual increase in emissions until the revised plan has been submitted to and approved by BOEM.

In response to the request accompanying your plan for a hydrogen sulfide (H<sub>2</sub>S) classification, the area in which the proposed drilling operations are to be conducted is hereby classified, in accordance with 30 CFR 250.490(c), as "H<sub>2</sub>S absent."

Exercise caution while drilling due to indications of shallow gas, faulting, and possible water flow.

You must comply with the following species protective measures in all activities conducted pursuant to the plan:

- **COMPLIANCE WITH BIOLOGICAL OPINION TERMS AND CONDITIONS AND REASONABLE AND PRUDENT MEASURES:** This approval is conditioned upon compliance with the Reasonable and Prudent Measures and implementing Terms and Conditions of the Biological Opinion issued by the National Marine Fisheries Service (NMFS) on March 13, 2020. This includes mitigation, particularly any appendices to Terms and Conditions applicable to the plan, as well as record-keeping and reporting sufficient to allow BOEM and BSEE to comply with reporting and monitoring requirements under the Biological Opinion; and any additional reporting required by BOEM or BSEE developed as a result of Biological Opinion implementation. The NMFS Biological Opinion may be found here: <https://www.fisheries.noaa.gov/resource/document/biological-opinion-federally-regulated-oil-and-gas-program-activities-gulf-mexico>. The Appendices and protocols may be found here: <https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.
- **SUPPORT BASES AND VESSEL TRANSIT ROUTES:** Approval of your plan is conditioned upon your use of the support bases and vessel transit routes as described in your plan. BOEM/BSEE must be notified at least 15 days prior to any vessel route changes that require transit of the Bryde's Whale area, and you must receive prior approval for that transit from BOEM/BSEE.
- **MARINE TRASH AND DEBRIS AWARENESS AND ELIMINATION:** The applicant will follow the guidance provided under Appendix B. Gulf of Mexico Marine Trash and Debris Awareness and Elimination Survey Protocols found in the Biological Opinion issued by NMFS on March 13, 2020. The guidance can be accessed on the National Oceanic and Atmospheric Administration (NOAA) Fisheries internet website at <https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.
- **VESSEL-STRIKE AVOIDANCE/REPORTING:** The applicant will follow the guidance provided under Appendix C. Gulf of Mexico Vessel Strike Avoidance and Injured/Dead Aquatic Protected Species Reporting Protocols found in the Biological Opinion issued by NMFS on March 13, 2020. The guidance can be accessed on the NOAA Fisheries internet site at <https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.

- **SEISMIC SURVEY OPERATION, MONITORING, AND REPORTING GUIDELINES:** The applicant will follow the guidance provided under Appendix A. Seismic Survey Mitigation and Protected Species Observer Protocols found in the Biological Opinion issued by NMFS on March 13, 2020. The guidance can be accessed on the NOAA Fisheries internet site at <https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.
- **MOON POOL MONITORING AND REPORTING:** A moon pool has been identified during review of your plan submittal. If any sea turtle or other marine mammal is detected, you are required to contact NMFS at [nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov) and BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov) for additional guidance and incidental report information.

The following measures regarding moon pools shall also be taken by the applicant:

- Prior to movement of the vessel and/or deployment and retrieval of equipment, the moon pool must be monitored continuously by a dedicated observer with no other tasks, to ensure no Endangered Species Act (ESA) listed species are present in the moon pool. Monitoring time depends on moon pool size as follows: large moon pools (i.e., greater than 45 feet in length on any side or a diameter greater than 40 feet for circular pools) should be monitored for at least 30 minutes prior to activity; medium moon pools (i.e., 20 feet to 45 feet in length on any side, or 20 to 40 feet in diameter for circular pools) should be monitored for at least 20 minutes prior to activity; small moon pools (i.e., smaller than 20 feet in length on any side or 20 feet or less in diameter for circular pools) should be monitored for at least 10 minutes prior to activity. If visibility is limited in the moon pool due to turbidity or low light, 30 minutes of monitoring is required regardless of moon pool size.
- Equipment should be deployed and retrieved at a slow enough rate to ensure that any potential for interaction with an undetected ESA listed species would not cause harm.
- If the moon pool has hull doors that can be closed, then the moon pool must be monitored continuously prior to and following closure by a dedicated crew observer with no other tasks to ensure that no ESA listed species are contained within the moon pool prior to transit. Monitoring time should be based on moon pool size as described above. If visibility is limited in the moon pool due to turbidity or low light, 30 minutes of monitoring are required regardless of moon pool size.
- If the moon pool has hull doors that can be closed, the operator should attempt to keep hull doors closed at all times when no activity is occurring within the moon pool, unless the safety of crew or vessel require otherwise.
- **ENTANGLEMENT AND ENTRAPMENT MONITORING AND REPORTING:** Any interaction with equipment or entanglement/entrapment of any ESA listed species (i.e., the animal cannot or does not leave the pool of its own volition) must be reported immediately. For assistance with marine mammals and sea turtles contact the stranding network listed at [www.fisheries.noaa.gov/report](http://www.fisheries.noaa.gov/report) and contact BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov) for additional guidance on continued monitoring requirements, recovery assistance needs (if required), and incidental report information. Other ESA listed species (e.g., giant manta ray) should be reported to relevant state agency wildlife lines, the ESA Section 7 biologist, and BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov).
- Any observation of a leatherback turtle (regardless of whether interaction with equipment or entanglement/entrapment is observed) must be reported immediately using contact information above.

- The vessel should not be moved and equipment should not be deployed or retrieved to/from the pool, to the extent practicable, until NMFS and BSEE are contacted and provide input on how to proceed.
- Any ESA listed species observed within a moon pool that then leaves the moon pool of its own volition should be reported within 24 hours to NMFS at [nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov) and BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov).
- If the observed animal is no longer observed in the moon pool, monitoring should take place for at least 30 minutes to ensure it has left the moon pool. After 30 minutes, activities may commence.
- **SEA TURTLE RESUSCITATION GUIDELINES:** The applicant will follow the guidance provided under Appendix J. Sea Turtle Handling and Resuscitation Guidelines found in the Biological Opinion issued by the NMFS on March 13, 2020. The guidance can be accessed on the NOAA Fisheries internet site at <https://www.fisheries.noaa.gov/resource/document/appendices-biological-opinion-federally-regulated-oil-and-gas-program-gulf-mexico>.
- **SLACK-LINE PRECAUTIONS AND REPORTING REQUIREMENT:** If operations require the use of flexible, small diameter (< 1 inch) nylon, plastic, or fiber lines to support operations (with or without divers), operators and contractors must reduce the slack in the line to prevent accidental entanglement of ESA listed species. The following measures are required (noting that diver safety is paramount, and the following measures should be followed only in cases where they do not jeopardize human safety).
  - Operators must utilize tensioning tools and/or other appropriate procedures to reduce unnecessary looseness in the lines and/or potential looping.
  - The lines must remain taut.
  - A line tender must be present at all times during dive operations and must monitor the line(s) the entire time a diver is in the water.  
Should the line tender and/or diver become aware of any ESA listed species entanglement, the following protocols must be followed as soon as safety permits.

Should an ESA listed species interaction result in entanglement, entrapment and/or injury occur, the interaction must be reported immediately or after diver safety (if present) is ensured.

For assistance with marine mammals contact the number(s) below:

<b>Marine Mammals</b>	
<b>State Stranding Network</b>	<b>Telephone</b>
Texas	(800) 962-6625
Louisiana	(504) 235-3005
Mississippi	(888) 767-3657
Alabama	(877) 942-5343
Florida	(888) 404-3922

\* Note: If you do not receive a response, go to the following website to ensure the listed number is correct:

<https://www.fisheries.noaa.gov/report>.

For assistance with sea turtles contact the number(s) below:

<b>Sea Turtles</b>	
<b>State Stranding Network</b>	<b>Telephone</b>
Texas	(361) 949-8173 x 226
Louisiana	(844) 732-8785
Mississippi	(228) 369-4796
Alabama	(866) 732-8878
Florida	(888) 404-3922

\* Note: If you do not receive a response, go to the following website to ensure the listed number is correct:  
<https://www.fisheries.noaa.gov/report>.

Assistance with other ESA listed species (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) should contact the ESA Section 7 biologist at (301) 427-8413 ([nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov)) and report all incidents to [takereport.nmfs@noaa.gov](mailto:takereport.nmfs@noaa.gov).

After the appropriate stranding networks have been contacted for assistance, you may contact BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov) for questions or additional guidance on recovery assistance needs (if still required), continued monitoring requirements, and incidental report information which at minimum is detailed below.

Within 24 hours of any event or observation, notify NMFS at [nmfs.psoreview@noaa.gov](mailto:nmfs.psoreview@noaa.gov) and BSEE at [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov) with the following information:

1. Time, date, water depth, and location (latitude/longitude) of the first discovery of the interaction;
2. Name, type, and call sign of the vessel (or platform) in which the event occurred;
3. Species identification (if known) or description of the animal involved;
4. Condition of the animal during the event;
5. Photographs or video footage of the animal;
6. Stranding network line that was contacted for assistance; and
7. General narrative and timeline describing the events that took place.

These measures are designed to promote environmental protection, consistent environmental policy, compliance with environmental laws, and safety.

If you have any questions or comments concerning this approval, please contact Chiquita Hill at (504)736-2668.

Sincerely,

for Bernadette Thomas  
 Regional Supervisor  
 Office of Leasing and Plans