October 12, 2022

UNITED	STATES	GOVERNMENT
MEMORAN	IDUM	

То:	Publi	c Information
From:	Plan	Coordinator, OLP, Plans Section (GM 235D)
Subject: Control # Type	Publi - -	c Information copy of plan Control S-8091 Supplemental Development Operations Coordination Document
Lease(s) Operator Description		OCS-G 33178 Block - 816 Mississippi Canyon Area LLOG Exploration Offshore, L.L.C. Wells SS001, SS02 and SS03
Rig Type	-	Drillship

Attached is a copy of the subject plan.

It has been deemed submitted and is under review for approval.

Nicole Martinez Plan Coordinator LLOG Exploration Offshore, L.L.C. 1001 Ochsner Blvd. Suite 100 Covington, Louisiana 70433

# SUPPLEMENTAL

# DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

# LEASE OCS-G-33178

# **MISSISSIPPI CANYON BLOCK 816**

# **"TAGGART"**

# **PUBLIC INFORMATION COPY**

**PREPARED BY:** 

Sue Sachitana Regulatory Specialist LLOG Exploration Offshore, L.L.C. (985) 801-4300 Main (985) 801-4716 Direct sue.sachitana@llog.com

Dated: August 1, 2022

### SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

#### PLAN CONTROL NUMBER S-8091

### Mississippi Canyon Block 816 OCS-G 33178 Lease

# **RECORD OF CHANGES**

Date of Submittal	Section/Page	Brief Synopsis
8/8/2022	Appendix I – Section D Page 28	Amended plan number in paragraph 3 to read N-9551 instead of N-9951.
9/8/2022	Appendix H – Attachment	Added distance to shore to Air Emission Form BOEM-139

### LLOG EXPLORATION OFFSHORE, L.L.C. SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT OCS-G-33178 LEASE MISSISSIPPI CANYON BLOCK 816

APPENDIX APlan ContentsAPPENDIX HAir Emissions InformationAPPENDIX IOil Spill InformationAPPENDIX MRelated Facilities and Operations InformationAPPENDIX RAdministrative Information

# APPENDIX A PLAN CONTENTS (30 CFR PART 550.211 AND 550.241)

### A. Plan Contents

Lease OCS-G-33178 Lease, Mississippi Canyon Block 816 was acquired by Houston Energy, L.P. and Red Willow Offshore, LLC at the Central Gulf of Mexico OCS Sale No. 208 held on March 18, 2009. The lease was issued with an effective date of June 1, 2009 and a primary term ending date of May 31, 2019. Effective June 1, 2009 Houston Energy, L.P. assigned 50% of Lease OCS-G-33178 Lease to LLOG Exploration Offshore, L.L.C. who was designated Operator February 18, 2010.

Effective June 21, 2013, BOEM approved LLOG's Initial Exploration Plan (Control No. N-09709) providing for well locations A, B, C and D. A Revised Exploration Plan (R-06094) was approved April 30, 2014 for wells B, C & D. A Supplemental Exploration Plan (S-07929) to reinstate well "D" was approved on April 18, 2019.

LLOG spud the OCS-G 33178 Lease, Mississippi Canyon Block 816 Well No. 001 (API #608174126500) on August 8, 2013 and temporarily abandoned the well on September 17, 2013 under approved Initial Exploration Plan (N-09709) Location "A" approved by BOEM on June 21, 2013.

LLOG spud the OCS-G 33178 Lease, Mississippi Canyon Block 816 Well No. 002 (API #608174130100) on March 11, 2015 and temporarily abandoned the well on April 10, 2015 under the Revised Exploration Plan (R-06094) Location "C" approved by BOEM on April 30, 2014.

LLOG spud the OCS-G-33178 Lease, Mississippi Canyon Block 816 Well No. 003 (API #608174140900) on May 22, 2019 and temporarily abandoned the well on June 12, 2019 under Supplemental Exploration Plan (S-07929) Location "D" approved by BOEM April 18, 2019.

The Initial Development Operations Coordination Document was filed to cover the installation of umbilical's, jumpers and to commence production from the Mississippi Canyon Block 816 Well Nos. SS001, SS002 and SS003. The subsea wells Nos. SS001, SS002 and SS003 will be connected via a proposed single 40,315' long x 6.625" O.D. ROW pipeline that will flow to the OCS-G-19996 Lease, Mississippi Canyon Block 773 "A" Platform operated by Eni US Operating Co. Inc. This Supplemental Development Operations Coordination Document is being filed to include a new lease term umbilical to control the MC 816 Well SS003. The proposed umbilical originated from an additional UTA near MC 816 well SS003 to another UTA located near the MC 816 SS002 well.

#### B. Location

Included are the following attachments:

Attachment A-1: Form MMS 137 – OCS Plan Information Form Attachment A-2: Well Location Plats Attachment A-3: Bathymetry Map Attachment A-4 – Conceptual Field Development

### C. Safety and Pollution Prevention Features

No drilling operations are proposed in this plan.

Safety of personnel and protection of the environment during the proposed operations is of primary concern with LLOG, and mandates regulatory compliance with the contractors and vendors associated with the proposed operations as follows:

**Bureau of Ocean Energy Management, Regulation, and Enforcement** mandates that the operations in this Plan comply with well control, pollution prevention, construction and welding procedures as described in Title 30 CFR Part 550, Subparts C, D, E, G and O; and as further clarified by Notices to Lessees.

Bureau of Ocean Energy Management, Regulation and Enforcement conducts periodic announced and unannounced onsite inspections of offshore facilities to confirm operators are complying with lease stipulations, operating regulations, approved plans, and other conditions; as well as to assure safety and pollution prevention requirements are being met. The National Potential Incident of Noncompliance (PINC) List serves as the baseline for these inspections supplemental with a civil penalties program.

**U.S. Coast Guard** regulations contained in Title 33 CFR mandate the appropriate life rafts, life jackets, ring buoys, etc. be maintained on the facility at all times.

**U.S. Environmental Protection Agency** regulations contained in the NPDES General Permit GMG290000 mandate that supervisory and certain designated personnel on-board the facility be familiar with the effluent limitations and guidelines for overboard discharge into the receiving waters.

### D. Storage Tanks and Vessels

The following table details the storage tanks and/or production vessels that will store oil (capacity greater than 25 bbls. or more) and be used to support the proposed activities (MODU, barges, platforms, etc.):

The following table details the storage tanks and/or production vessels that will store oil (capacity greater than 25 bbls. or more) and be used to support the proposed activities (MODU, barges, platforms, etc.):

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of tanks	Total Capacity (bbls)	Fluid Gravity (API)
N/A					

# Note: NO ADDITIONAL DRILLING OPERATIONS – PROPOSED UNSCHEDULED WORKOVERS ONLY

# E. Pollution Prevention Measures

Not applicable. The State of Florida is not an affected State by the proposed activities in this plan.

# F. Additional Measures

LLOG does not propose any additional safety, pollution prevention, or early detection measures, beyond those required in 30 CFR 550.

# G. Cost Recovery Payment

Since this is a Supplemental Development Operations Coordination Document that proposes no new wells, a permit fee for the proposed plan is not required.

# **OCS PLAN INFORMATION FORM**

# Attachment A-1 (Proprietary Information)

# **U.S. Department of the Interior** Bureau of Ocean Energy Management

#### **OCS PLAN INFORMATION FORM**

	General Information															
Туре	of OCS Plan:	]	Explo	oration Pla	an (EP)	Dev				lination Docur	nent (I	DOCD	)			X Supplemental
Comp	any Name: LLC	OG Explorat	ion (	Offshore,	LLC			erator Nun								
Addre	SS:							erson: Sue								
	1001 Och	nsner Boule	vard	Suite 1	00			<sup>nber:</sup> 985								
		ovington, LA						<sup>ldress:</sup> sue	.sa	ichitana@llog	j.com					
If a se	rvice fee is requ	uired under 3	0 CF					mount paid		N/A		ceipt N	0.			
				Proje	ct and			0		CD) Inform		n				
	(s): OCS-G 331			Area: M			Propage and the second s			plicable): Tag	0					
1000	tive(s) X O			Sulphu		Salt			se(s)	) <sup>:</sup> Fourchon,			27.A			
	rm/Well Name:				olume o		<sup>):</sup> 1.625 MN					Gravity	:30.8			
	ice to Closest L									<sup>out:</sup> 28,018 b	bls/da	у				0
	you previously				2500			-	-	-		Х	Yes		N	0
0805	provide the Cor								s pr	rovided		N-97	1000000			
-	u propose to us												Yes	X	N	o
	u propose to us												Yes	X	N	0
Do yo	u propose any i	facility that v	vill se	erve as a l	host fac	ility fo	r deepwater	subsea deve	elop	oment?			Yes	X	N	0
	Description of Proposed Activities and Tentative Schedule (Mark all that apply)															
	Proposed Activity Start Date End Date No. of Days															
2	ration drilling															
	opment drilling	Ş														
	completion															
	est flaring (for			8800												
Instal	ation or modifi	cation of stru	icture	<b>;</b>												
	ation of produc															
100000000000000000000000000000000000000	ation of subsea		00000000000		1875.84											
Instal	ation of lease to	erm pipeline	s Jun	npers/Um	bilicals	6	See Attach	ed Schedul	e				0			
	nence productio															
Other	(Specify and at	-		0.000		uled W	orkovers									
		Description	n of		9 0						cripti		Structu			
	Jackup		Х		lship				isso				Tension 1	•••		m
	Gorilla Jackup				form rig	-				platform			Complian		er	
	Semisubmersi				mersible			Sp					Guyed to			
	DP Semisubr			Othe	er (Atta	ch Dese	cription)		oatir stem	ng production			Other (At	tach I	Desc	cription)
Drilli	ng Rig Name (I	f Known):														
							otion of Lo	and the state of the state of the	with a second							10.00 Million
Fro	m (Facility/Are	ea/Block)		To (Fa	acility/#	Area/B	lock)		Jiar	meter (Inches	)			Len	gth	(Feet)

	OCS PL	AN INF	ORMAT	ION FO	ORM (C	ONTINUED)	
clude	one copy	y of this	page for	each pi	roposed	well/structur	e

			Include one cop	y of thi	s page for eac	h proposed well/	'struc	ture						
			Pro	posed <b>V</b>	Well/Structu	re Location								
			enaming well or IC 816 Well SS001	Prev DOC	•	under an approved	EP or	X	Yes		No			
Is this an existi or structure?	ng well				this is an existing well or structure, list the omplex ID or API No.					174	4126500			
Do you plan to	use a subs	sea BOP or a	surface BOP on a flo	pating facility to conduct your proposed activities?					Ye	S	No			
WCD info		, volume of u (Bbls/day): 2			ctures, volume o s (Bbls): 9 bbls	f all storage and		API Gravity of fluid 30.8						
	Surface I	Location		Botto	m-Hole Locatio	on (For Wells)			letion separa		multiple completions, ues)			
Lease No.	OCS OCS-G 3	3178		OCS				OCS OCS						
Area Name	Ν	lississip	oi Canyon											
Block No.		81	16											
Blockline Departures	N/S Depa		F <u>n</u> L	N/S I	Departure:	F	L		Departu epartu		FL FL			
(in feet)	6431							N/S D			FL			
	E/W Dep		F <u>w</u> L	E/W	Departure:	F	L		Depart		FL FL			
	2442	.86'						E/W Departure:         FL           E/W Departure:         FL           X:         X:						
Lambert X- Y	X:		<u></u>	X:										
coordinates														
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	,	26,208	3.51		Y: Y:									
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Anchor Radius	(if applica	ble) in feet:			N/A	r.		MD (I	Feet):		TVD (Feet):			
Anchor Lo	cations f	or Drilling	g Rig or Constru	ction <b>B</b>	arge (If ancho	or radius supplied	above	, not ne	cessar	y)				
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Leng	th of A	nchor	Chai	n on Seafloor			
			X =		Y =									
			X =		Y =									
			X =		Y =									
			X =		Y =									
			X = X =		Y = Y =									
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			X =		Y =									

	OCS	PLA	N IN	FOR	MAT	TON	FOF	RM (C	ONTIN	VUED)	
clude	one o	copy	of th	is pag	ge for	each	prop	oosed	well/st	ructure	

			Include one cop	y of thi	s page for eac	h proposed well/	/struc	ture				
			Pro	posed	Well/Structu	re Location						
structure, refere	ence previo		naming well or IC 816 Well SS002	DOC	CD?	under an approved	EP or	X	Yes		No	
Is this an existi or structure?	ng well	Y >			this is an existing well or structure, list the pomplex ID or API No.					174	4130100	
Do you plan to	use a subs	sea BOP or a	surface BOP on a flo	pating facility to conduct your proposed activities?					Ye	s	No	
WCD info		, volume of u (Bbls/day): 2			ctures, volume o s (Bbls): 9 bbls	f all storage and		API Gravity of fluid 30.8				
	Surface I	Location	·	Botto	om-Hole Locatio	on (For Wells)		Completion (For multiple completions, enter separate lines)				
Lease No.	OCS OCS-G 33	3178		OCS				OCS OCS				
Area Name	N	/lississipp	oi Canyon									
Block No.		81	6									
Blockline	N/S Depa	arture:	F <u>n</u> L	N/S I	Departure:	F	L		Departi		FL FL	
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	2672	.64" FE	L					E/W Departure:         FL           E/W Departure:         FL				
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Y coordinates	, ,											
	Y:			Y:				Y: Y:				
	10,2	28,371	.81									
Latitude/ Longitude	Latitude			Latitu	Latitude							
Longitude	1	10' 28.	339"					Latitude Latitude				
	Longitud			Long	itude			Long				
	88° 4	15' 25.	781"					Longitude Longitude				
Water Depth (I 5655'	Feet):			MD (	Feet):	TVD (Feet):			(Feet): (Feet):		TVD (Feet): TVD (Feet):	
Anchor Radius	(if applica	ble) in feet:			N/A	5		MD (.			TVD (Feet):	
Anchor Lo	cations f	or Drilling	g Rig or Constru	ction <b>B</b>	arge (If ancho	or radius supplied	above	, not no	ecessar	y)		
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Leng	th of A	nchor	Chai	n on Seafloor	
	_		X =		Y =							
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			X =		Y =							
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	OCS PL	AN INF	ORMAT	ION FO	ORM (C	ONTINUED)	
clude	one copy	y of this	page for	each pi	roposed	well/structur	e

			Include one cop	oy of thi	s page for eac	h proposed well/	struct	ure					
			Pro	posed V	Well/Structu	re Location							
			naming well or IC 816 Well SS003	Prev DOC		under an approved	EP or	X	Yes		No		
Is this an existi or structure?	ng well	Y			this is an existing well or structure, list the pomplex ID or API No.					174	4140900		
Do you plan to	use a subs	sea BOP or a	surface BOP on a fl	oating fac	pating facility to conduct your proposed activities?					S	No		
WCD info		, volume of u (Bbls/day): 2	incontrolled 8,018 bbls/day		For structures, volume of all storage and pipelines (Bbls): 9 bbls				API Gravity of fluid 30.8				
	Surface I	Location		Botto	m-Hole Locatio	on (For Wells)			letion separa		multiple completions, les)		
Lease No.	OCS OCS-G 33	3178		OCS				OCS OCS					
Area Name	N	lississipp	oi Canyon										
Block No.		81	6										
Blockline Departures	N/S Depa		F <u>n</u> L	N/S I	Departure:	F	L		Departu epartu		F L F L		
(in feet)		.55' FN	L					N/S D	epartu	re:	FL		
	E/W Dep		F <u>e</u> L	E/W	Departure:	F	L		Depart		FL FL		
	7801	' FEL						E/W Departure:FLE/W Departure:FL					
Lambert X- Y	X:			X:									
coordinates	1,069,318.24												
	Y:			Y:	Y:								
	10,22	27,470	.35										
Latitude/ Longitude	Latitude			Latitu	Latitude								
Longitude	28 10	0' 18.6	75"					Latitude Latitude					
	Longitude			Longi	itude			Longitude					
	88 46	6' 22.9	40"					Longitude Longitude					
Water Depth (H 5643'	Feet):			MD (	Feet):	TVD (Feet):		MD ( MD (			TVD (Feet): TVD (Feet):		
Anchor Radius	(if applica	ble) in feet:			N/A	5		MD (I			TVD (Feet):		
Anchor Loo	cations fo	or Drilling	Rig or Constru	iction B	arge (If ancho	or radius supplied	above,	not ne	cessar	y)			
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Leng	th of A	nchor	Chai	n on Seafloor		
			X =		Y =								
	-		X =		Y =								
			X =		Y =								
			X =		Y =								
			X =		Y =								
			X =		Y =								
			X =		Y =								
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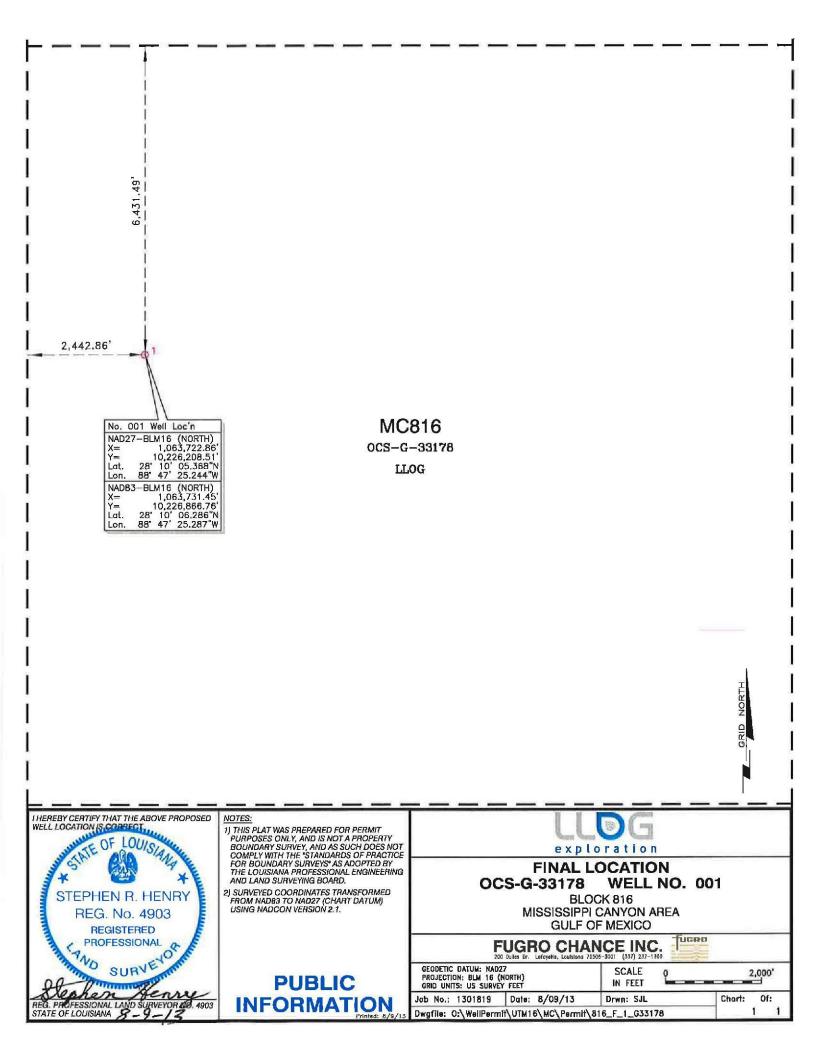
# Supplemental Development Operations Coordination Document OCS-G 33178 Lease Mississippi Canyon Block 816

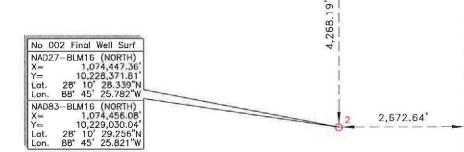
# **Proposed Activity Schedule**

Proposed Activity	Start Date	End Date	No. of Days
Lease Term Infield Umbilical	8/1/2023	8/6/2023	5
Hook-up and Commence Production	8/7/2023	8/7/2023	1

# WELL LOCATION PLATS

# Attachment A-2 (Proprietary Information)

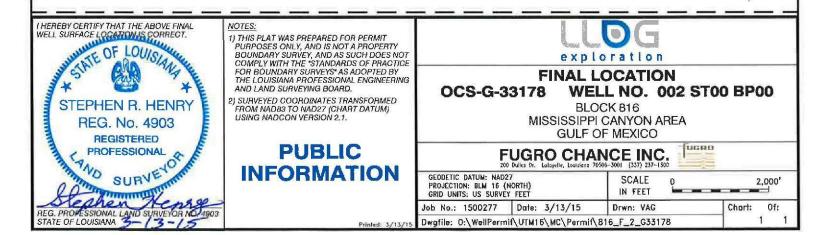


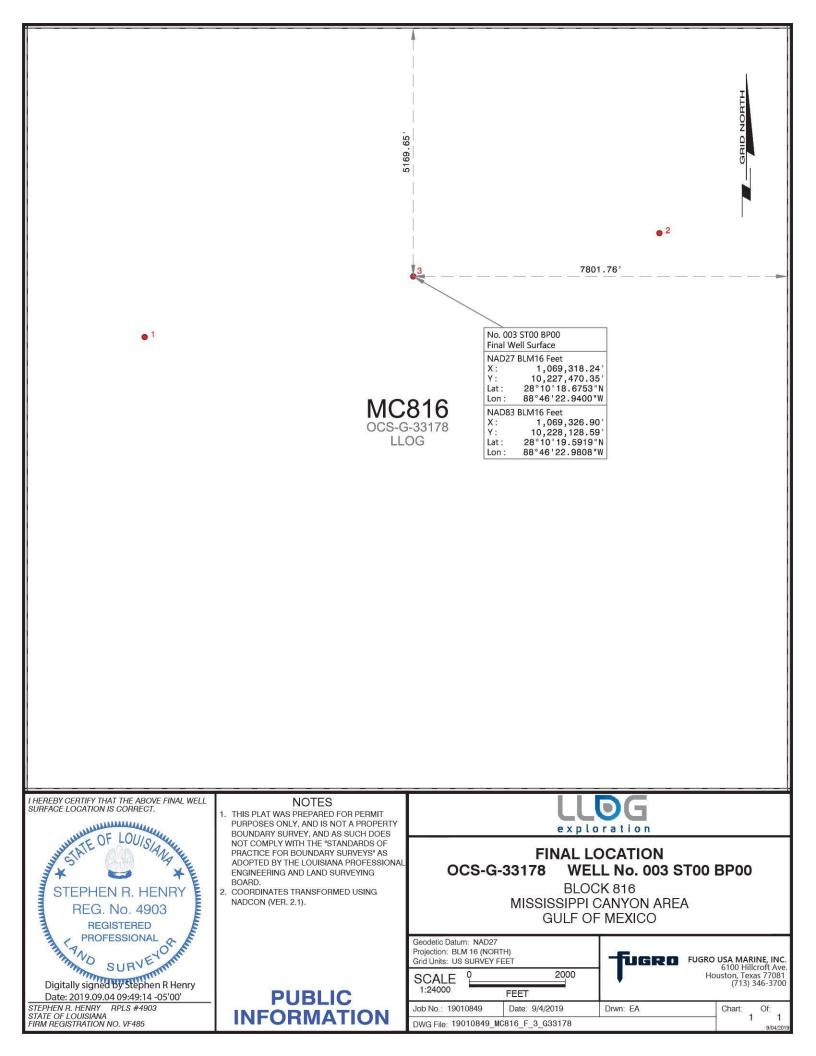


NORTH

01

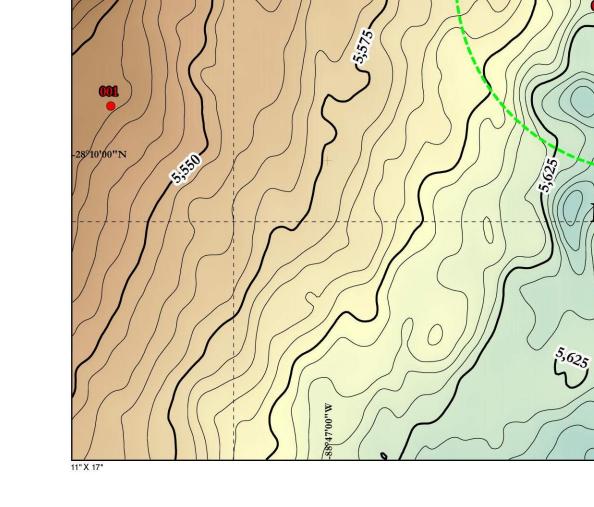
MC816 ocs-g-33178 LLOG





# **BATHYMETRY MAP**

Attachment A-3 (Public Information)



X = 1,069,318.24 ft 28° 10' 18.675'' N 7,801.76 ft FEL 5,169.65 ft FNL

UT

5,500

1525

Y = 10,227,470.35 ft 88° 46' 22.940" W

5,600

5,625

1,070

,000

D

5;675

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MASTOO

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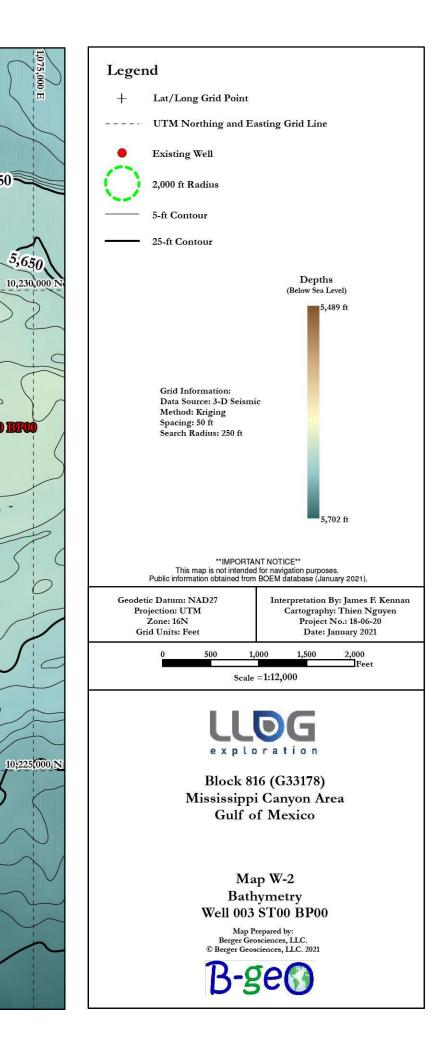
MC 816

G33178

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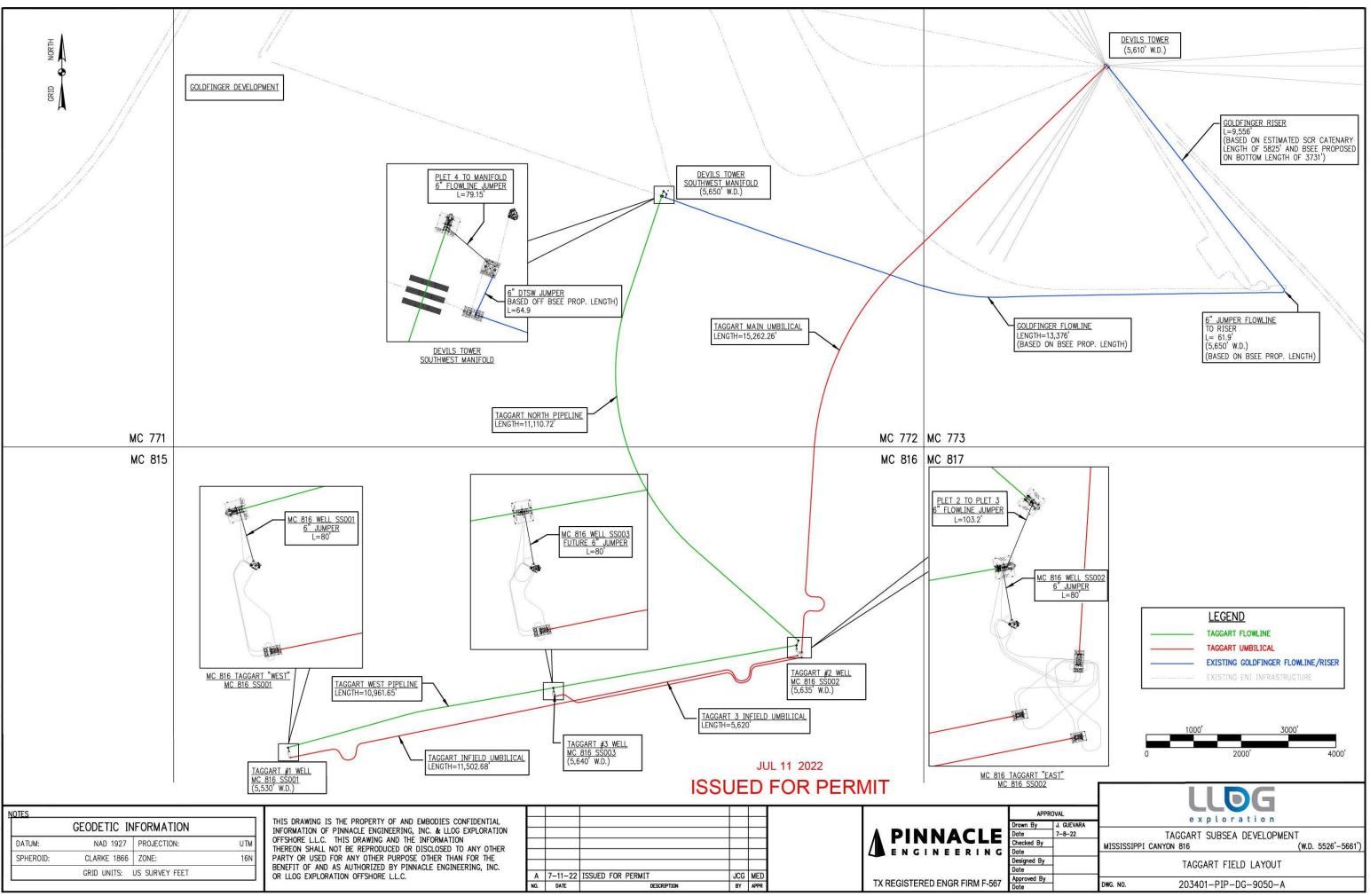
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12 ST00 BP

5,650

# **CONCEPTUAL FIELD DEVELOPMENT**

Attachment A-4 (Public Information)



JGUEVARA 7/11/2022 7:53:10 AM P:\STRUCT\203401\PIPELINE\203401-PIP-DG-9050-

# APPENDIX H AIR EMISSIONS INFORMATION (30 CFR PART 550.218AND 550.249)

The primary air pollutants associated with OCS development activities are:

- Carbon Monoxide
- Particulate Matter
- Sulphur Oxides
- Nitrogen Oxides
- Volatile Organic Compounds

These offshore air emissions result mainly from the drilling rig operations, helicopters, and support vessels. These emissions occur mainly from combustion or burning of fuels and natural gas and from venting or evaporation of hydrocarbons. The combustion of fuels occurs primarily on diesel powered generators, pumps or motors and from lighter fuel motors. Other air emissions can result from catastrophic events such as oil spills and blowouts.

# A. Emission Worksheets and Screening Questions

The Projected Air Quality Emissions Report (Form MMS-139) addresses the related support vessels and construction barge information.

### **B.** Emissions Reduction Measures

The projected air emissions are within the exemption level; therefore, no emission reduction measures are being proposed.

# C. Verification of Non-default Emissions Factors

LLOG has elected to use the default emission factors as provided in *Attachment H-1* 

### **D.** Non-Exempt Activities

The proposed activities are within the exemption amount.

# E. Modeling Report

Not applicable. The State of Florida is not an affected State for the proposed activities in this plan.

# **Air Quality Emissions Report**

Attachment H-1 (Public Information)

# **Attachment H-1**

# Air Emissions Information (§§ 550.218 and 550.249)

Screening Questions for DOCD's	Yes	No
Is any calculated Complex Total (CT) Emission amount (tons) associated with your		
proposed development and production activities more than 90% of the amounts		
calculated using the following formulas: $CT = 3400D2/3$ for CO, and $CT = 33.3D$ for		X
the other air pollutants (where D = distance to shore in miles)?		
Do your emission calculations include any emission reduction measures or modified		
emission factors?		X
Does or will the facility complex associated with your proposed development and		
production activities process production from eight or more wells?		
		X
Do you expect to encounter H2S at concentrations greater than 20 parts per million		
(ppm)?		X
Do you propose to flare or vent natural gas in excess of the criteria set forth under		
30 CFR 250.1105(a)(2) and (3)?		X
Do you propose to burn produced hydrocarbon liquids?		Х
Are your proposed development and production activities located within 25 miles (40		
kilometers) from shore?		X
Are your proposed development and production activities located within 124 miles		
(200 kilometers) of the Breton Wilderness Area?	X	

The air emissions proposed in this plan is meant to add to the air emissions previously approved in the Initial DOCD (N-10154) and not replace or reduce them in any way.

COMPANY	LLOG Exploration Offshore, L.L.C.
AREA	Mississippi Canyon
BLOCK	816
LEASE	OCS-G-33178
FACILITY	N/A
WELL	MC 816 Well SS001, SS002 and SS003
COMPANY CONTACT	Sue Sachitana
TELEPHONE NO.	985-801-4300
REMARKS	

LEASE TER	EASE TERM PIPELINE CONSTRUCTION INFORMATION:									
YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS								
2023	1	5 days total - Associated umbilical								
2024										
2025										
2026										
2027										
2028										
2029										
2030										
2031										
2032										

#### AIR EMISSIONS COMPUTATION FACTORS

Fuel Usage Conversion Factors	Natural Gas	s Turbines			Natural Ga	as Engines	Diesel Re	cip. Engine	Diesel	Furbines			]
	SCF/hp-hr	9.524			SCF/hp-hr	7.143	GAL/hp-hr	0.0514	GAL/hp-hr	0.0514			]
							-						
Equipment/Emission Factors	units	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	co	NH3	REF.	DATE	Reference Links
Natural Gas Turbine	g/bp.br		0.0096	0.0086	0.0026	1 1515	0.0095	NI/A	0.2710	NI/A	AP42 3.1-1& 3.1-2a	4/00	https://www.2.opg.gov/ttpshig1/op/2/ch02/fingl/c02c01.pdf
RECIP. 2 Cycle Lean Natural Gas	g/hp-hr g/hp-hr		0.0086	0.1293	0.0026	1.4515 6.5998	0.0095	N/A N/A	0.3719	N/A N/A	AP42 3.1-1& 3.1-2a AP42 3.2-1	7/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf https://www3.epa.gov/ttn/chief/ap42/ch03/final/c03s02.pdf
RECIP. 4 Cycle Lean Natural Gas	g/hp-hr		0.0002	0.0002	0.0020	2.8814	0.4002	N/A	1.8949	N/A	AP42 3.2-2	7/00	https://www3.epa.gov/ttn/chief/ap42/ch03/final/c03s02.pdf
RECIP. 4 Cycle Rich Natural Gas	g/hp-hr		0.0323	0.0323	0.0020	7.7224	0.1021	N/A	11.9408	N/A	AP42 3.2-3	7/00	https://www3.epa.gov/ttn/chief/ap42/ch03/final/c03s02.pdf
Diesel Recip. < 600 hp	g/hp-hr	1	1	1	0.0279	14.1	1.04	N/A	3.03	N/A	AP42 3.3-1	10/96	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s03.pdf
Diesel Recip. > 600 hp	g/hp-hr	0.32	0.182	0.178	0.0055	10.9	0.29	N/A	2.5	N/A	AP42 3.4-1 & 3.4-2	10/96	https://www3.epa.gov/ttn/chief/ap42/ch03/final/c03s04.pdf
Diesel Boiler	lbs/bbl	0.0840	0.0420	0.0105	0.0089	1.0080	0.0084	5.14E-05	0.2100	0.0336	AP42 1.3-6; Pb and NH3: WebFIRE (08/2018)	9/98 and 5/10	https://cfpub.epa.gov/webfire/
Diesel Turbine	g/hp-hr	0.0381	0.0137	0.0137	0.0048	2.7941	0.0013	4.45E-05	0.0105	N/A	AP42 3.1-1 & 3.1-2a	4/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf
Dual Fuel Turbine	g/hp-hr	0.0381	0.0137	0.0137	0.0048	2.7941	0.0095	4.45E-05	0.3719	0.0000	AP42 3.1-1& 3.1-2a; AP42 3.1-1 & 3.1-2a	4/00	https://cfpub.epa.gov/webfire/
lassala Branulsian	g/bp.br	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference	3/19	
Vessels – Propulsion	g/hp-hr							2.24E-05	1.2025		USEPA 2017 NEI; TSP refer to Diesel Recip. > 600 hp reference	3/19	https://www.epa.gov/air-emissions-inventories/2017-national-emissions-
Vessels – Drilling Prime Engine, Auxiliary	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204			0.0022			inventory-nei-data
Vessels – Diesel Boiler	g/hp-hr	0.0466	0.1491	0.1417	0.4400	1.4914	0.0820	3.73E-05	0.1491	0.0003	USEPA 2017 NEI;TSP (units converted) refer to Diesel Boiler Reference	3/19	
Vessels – Well Stimulation	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference	3/19	https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s04.pdf
Natural Gas Heater/Boiler/Burner	lbs/MMscf	7.60	1.90	1.90	0.60	190.00	5.50	5.00E-04	84.00	3.2	AP42 1.4-1 & 1.4-2; Pb and NH3: WebFIRE (08/2018)	7/98 and 8/18	https://cfpub.epa.gov/webfire/
Combustion Flare (no smoke)	Ibs/MMscf	0.00	0.00	0.00	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
Combustion Flare (light smoke) Combustion Flare (medium smoke)	lbs/MMscf lbs/MMscf	2.10	2.10 10.50	2.10 10.50	0.57	71.40 71.40	35.93 35.93	N/A N/A	325.5 325.5	N/A N/A	AP42 13.5-1, 13.5-2 AP42 13.5-1, 13.5-2	2/18 2/18	https://www3.epa.gov/ttn/chief/ap42/ch13/final/C13S05_02-05-18.pdf
Combustion Flare (heavy smoke)	lbs/MMscf	21.00	21.00	21.00	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	-
Liquid Flaring	lbs/bbl	0.42	0.0966	0.0651	5.964	0.84	0.01428	5.14E-05	0.21	0.0336	AP42 1.3-1 through 1.3-3 and 1.3-5	5/10	https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s03.pdf
· *		0.12	0.0000	0.0001	0.001	0.01	0.01120	0.112.00	0.21	0.0000			https://www.boem.gov/environment/environmental-studies/2014-gulfwid
Storage Tank	tons/yr/tank						4.300				2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	emission-inventory
Fugitives	lbs/hr/component						0.0005				API Study	12/93	https://www.apiwebstore.org/publications/item.cgi?9879d38a-8bc0-4abe bb5c-9b623870125d
Glycol Dehydrator	tons/yr/dehydrator						19.240				2014 Culturida Inventoria Augustica (unner bound of 050( Cl)	2014	https://www.boem.gov/environment/environmental-studies/2011-gulfwid emission-inventory
							19.240				2011 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)		https://www.boem.gov/environment/environmental-studies/2014-gulfwid
Cold Vent	tons/yr/vent						44.747				2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	emission-inventory
Waste Incinerator	lb/ton		15.0	15.0	2.5	2.0	N/A	N/A	20.0	N/A	AP 42 2.1-12	10/96	https://www3.epa.gov/ttnchie1/ap42/ch02/final/c02s01.pdf
On-Ice – Loader	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Other Construction Equipment	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Other Survey Equipment	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Tractor	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	https://www.epa.gov/moves/nonroad2008a-installation-and-updates
On-Ice – Truck (for gravel island)	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Truck (for surveys)	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
Man Camp - Operation (max people/day)	tons/person/day		0.0004	0.0004	0.0004	0.006	0.001	N/A	0.001	N/A	BOEM 2014-1001	2014	https://www.boem.gov/sites/default/files/uploadedFiles/BOEM/BOEM_I wsroom/Library/Publications/2014-1001.pdf
Vessels - Ice Management Diesel	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference	3/19	https://www.epa.gov/air-emissions-inventories/2017-national-emissions
Vessels - Hovercraft Diesel	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEI;TSP refer to Diesel Recip. > 600 hp reference		inventory-nei-data

Sulfur Content Source	Value	Units
Fuel Gas	3.38	ppm
Diesel Fuel	0.0015	% weight
Produced Gas (Flare)	3.38	ppm
Produced Oil (Liquid Flaring)	1	% weight

Value

0.6816

98

Units

%

Ib VOC/Ib-mol gas

Natural Gas Flare Parameters

VOC Content of Flare Gas Natural Gas Flare Efficiency

	Fuel	
Density	7.05	lbs/gal
Heat Value	19,300	Btu/lb

Heat Value of Natural Gas											
Heat Value	1,050	MMBtu/MMscf									

				- 10 - 10 - 10 - 10									St. 15,000 12,000 Jan 10												
COMPANY LLOG Exploration Offshore, L.L.	AREA C. Mississippi Canyon		816	LEASE OCS-G-33178	FACILITY N/A	WELL MC 816 Well 3	SS001 66000	and \$2003			CONTACT Sue Sachitana		PHONE 985-801-4300		REMARKS										
OPERATIONS		EQUIPMENT ID	RATING	MAX. FUEL			TIME					M POUNDS PE								ES		NS			
	Diesel Engines		HP	GAL/HR	GAL/D																				
	Nat. Gas Engines		HP	SCF/HR	SCF/D																				
	Burners		MMBTU/HR	SCF/HR	SCF/D	HR/D	D/YR	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	со	NH3
DRILLING	VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - Diesel VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00 0.00		0	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00
	VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels - Diesel Boiler		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels – Drilling Prime Engine, Auxiliary		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIPELINE	VESSELS - Pipeline Laying Vessel - Diesel		0	0	0.00	24	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INSTALLATION	VESSELS - Pipeline Burying - Diesel Support Vessel Diesel (ROV) for LT UMB		8000	411.568001	9877.63	24	5	5.64	3.41	3.30	0.08	135.22	3.89	0.00	21.21	0.04	0.34	0.20	0.20	0.00	8.11	0.23	0.00	1.27	0.00
	Support Vessel Diesel (ROV) for ET ONIB																								
FACILITY INSTALLATION	VESSELS - Heavy Lift Vessel/Derrick Barge Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PRODUCTION	RECIP.<600hp Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
	RECIP.>600hp Diesel VESSELS - Shuttle Tankers		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
	VESSELS - Shuttle Tankers VESSELS - Well Stimulation		0	0	0.00 0.00		0	0.00 0.00	0.00	0.00	0.00 0.00	0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00	0.00 0.00	0.00 0.00	0.00 0.00
	Natural Gas Turbine		0	0	0.00	0	0		0.00	0.00	0.00	0.00	0.00		0.00			0.00	0.00	0.00	0.00	0.00		0.00	
	Diesel Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Dual Fuel Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 2 Cycle Lean Natural Gas		0	0	0.00	0	0		0.00	0.00	0.00	0.00	0.00		0.00			0.00	0.00	0.00	0.00	0.00		0.00	
	RECIP. 4 Cycle Lean Natural Gas		0	0	0.00	0	0		0.00	0.00	0.00	0.00	0.00		0.00			0.00	0.00	0.00	0.00	0.00		0.00	-
	RECIP. 4 Cycle Rich Natural Gas Diesel Boiler		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00 0.00	0.00 0.00	 0.00	0.00 0.00	0.00		0.00	0.00 0.00	0.00 0.00	0.00	0.00	0.00	0.00	
	Natural Gas Heater/Boiler/Burner		0	0	0.00		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.00	0.00 0.00
	MISC.		BPD	SCF/HR	COUNT		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	STORAGE TANK				0	0	0						#DIV/0!									0.00			
	COMBUSTION FLARE - no smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
	COMBUSTION FLARE - light smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
	COMBUSTION FLARE - medium smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
	COMBUSTION FLARE - heavy smoke COLD VENT			0			0	0.00	0.00	0.00	0.00	0.00	0.00 #DIV/0!		0.00		0.00	0.00	0.00	0.00	0.00	0.00 0.00		0.00	
	FUGITIVES				0		0						0.00									0.00			
	GLYCOL DEHYDRATOR				0	0	0						#DIV/0!									0.00			
	WASTE INCINERATOR		0			0	0		0.00	0.00	0.00	0.00			0.00			0.00	0.00	0.00	0.00			0.00	
DRILLING	Liquid Flaring		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WELL TEST	COMBUSTION FLARE - no smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
	COMBUSTION FLARE - light smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
	COMBUSTION FLARE - medium smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
	COMBUSTION FLARE - heavy smoke			0		0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00	0.00	0.00	0.00	0.00		0.00	
ALASKA-SPECIFIC SOURCES	VESSELS		kW			HR/D	D/YR																		
SUURCES	VESSELS - Ice Management Diesel		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
202	3 Facility Total Emissions							5.64	3.41	3.30	0.08	135.22	#DIV/0!	0.00	21.21	0.04	0.34	0.20	0.20	0.00	8.11	0.23	0.00	1.27	0.00
EXEMPTION	DISTANCE FROM LAND IN MILES																								
CALCULATION	Deservices of the second s			_													1,964.70			1,964.70	1,964.70	1,964.70		51,528.43	
DRILLING	59.0 VESSELS- Crew Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Supply Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Tugs Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIPELINE	VESSELS - Support Diesel, Laying		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INSTALLATION	VESSELS - Support Diesel, Burying		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Crew Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY	VESSELS - Supply Diesel VESSELS - Material Tug Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INSTALLATION	VESSELS - Crew Diesel			0	0.00 0.00		0	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00	0.00 0.00
IN OTALLA THOM	VESSELS - Supply Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PRODUCTION	VESSELS - Support Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ALASKA-SPECIFIC	On-Ice Equipment			GAL/HR	GAL/D																				
SOURCES		-																							
	Man Camp - Operation (maximum people per day) VESSELS		PEOPLE/DAY				D/YR																		
	On-lce – Loader			0	0.0	<b>HR/D</b>		0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
	On-Ice – Other Construction Equipment			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
	On-Ice – Other Survey Equipment			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
	On-Ice – Tractor			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
	On-Ice – Truck (for gravel island)			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
	On-Ice – Truck (for surveys)			0	0.0	0	0	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
	Man Camp - Operation VESSELS - Hovercraft Diesel		0			0	0	0.00 0.00	0.00 0.00	0.00	0.00 0.00	0.00	0.00 0.00		0.00	0.00	0.00	0.00	0.00 0.00	0.00 0.00	0.00	0.00	0.00	0.00	0.00
202	3 Non-Facility Total Emissions		U			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
202						_			0.00	0.00	0.00	0.00	0.00	0.00	5.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

#### AIR EMISSIONS CALCULATIONS

COMPANY		AREA	BLOCK	LEASE	FACILITY	WELL			
LLOG Explora	tion Offshore, L.L.C.	816	OCS-G-33178						
Year				Facility	/ Emitted Su	bstance			
	TSP	PM10	PM2.5	SOx	NOx	voc	Pb	co	NH3
2023	0.34	0.20	0.20	0.00	8.11	0.23	0.00	1.27	0.00
2024	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2025	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2026	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2027	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2028	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2029	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2030	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2031	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2032	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Allowable	1964.70			1964.70	1964.70	1964.70		51528.43	

# APPENDIX I OIL SPILL INFORMATION (30 CFR PART 550.219 AND 550.250)

# A. Oil Spill Response Planning

All the proposed activities in this Supplemental Development Operations Coordination Document will be covered by the Oil Spill Response Plan filed by LLOG (No. 02058) in accordance with 30 CFR 254, plan was last approved on November 3, 2020.

The WCD proposed in this Plan does not exceed the WCD outlined in our OSRP.

### B. Spill Response Sites

The following locations will be used in the event an oil spill occurs as a result of the proposed activities.

Primary Response Equipment Location	Pre-Planned Staging Location(s)
Houma, LA	Venice, LA

### C. OSRO Information

The O'Brien Group (TOG) will provide trained personnel capable of providing supervisory management of the oil spill response in addition to contacting and deploying cleanup personnel and equipment

LLOG utilizes Clean Gulf Associates (CGA) as it's primary provider for equipment, which is an industry cooperative owning an inventory of oil spill clean-up equipment. CGA is supported by the Marine Spill Response Corporation's (MSRC), which is responsible for storing, inspecting, maintaining and dispatching CGA's equipment. The MSRC STARS network provides for the closest available personnel, as well as an MSRC supervisor to operate the equipment.

Category	Regional OSRP	Revised DOCD
Type of Activity	Development	Development
	Production >10 miles from shore	Production>10 miles from shore
Facility Surface Location	Mississippi Canyon Block 547	Mississippi Canyon 816
Facility Description	Platform "A"	Well SS002
Distance to Nearest Shoreline		
(Miles)	58 miles	59 miles
Volume:		
Storage Tanks (total)	3902 bbls	0
Facility Piping (total)	200 bbls	0
Lease Term Pipeline	1908 bbls	0
Uncontrolled Blowout (day)	29,440 bbls	0
Barging		
Potential 24 Hour Volume	35,450 bbls	The proposed umbilical will not
(bbls)		contain hydrocarbons.
Type of Liquid Hydrocarbon	Crude Oil	N/A
API Gravity	27°	N/A

# D. <u>Worst-Case Scenario Information</u>

LLOG Exploration Offshore, L.L.C. (LLOG) has the capability to respond to the appropriate worst-case spill scenario included in its regional OSRP Plan, by LLOG (No. 02058) in accordance with 30 CFR 254, our plan was last approved on November 3, 2020.

Since LLOG Exploration Offshore, L.L.C. (LLOG) has the capability to respond to the appropriate worst-case spill scenario included in its regional OSRP approved on July 21, 2020 and since the worst case discharge determined for our Revised Development Operations Coordination Document does not replace the appropriate worstcase scenario in our regional OSRP, I hereby certify that LLOG Exploration Offshore, L.L.C. has the capability to respond, to the maximum extent practicable, to a worst-case discharge, or a substantial threat of such a discharge, resulting from the activities proposed in our Revised Development Operations Coordination Document.

The WCD for the subject plan does not exceed the worst case discharge previously submitted for MC 547 (Plan N-9551). LLOG Exploration Offshore, L.L.C., Company No. 02058, previously submitted the Regional OSRP Production WCD volume to be reviewed in Plan N-9551, Initial DOCD approved on May 23, 2011.

# E. Oil Spill Response Discussion

See the following Oil Spill Response Discussion.

#### SPILL RESPONSE DISCUSSION

For the purpose of NEPA and Coastal Zone Management Act analysis, the largest spill volume originating from the proposed activity would be a well blowout during drilling operations, estimated to be 28,018 barrels of crude oil with an API gravity of 30.8°.

#### Land Segment and Resource Identification

Trajectories of a spill and the probability of it impacting a land segment have been projected utilizing information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf of Mexico available on the BOEM website. The results are shown in **Figure 1**. The BOEM OSRAM identifies an 11% probability of impact to the shorelines of Plaquemines Parish, Louisiana within 30 days. Plaquemines Parish includes Barataria Bay, the Mississippi River Delta, Breton Sound and the affiliated islands and bays. This region is an extremely sensitive habitat and serves as a migratory, breeding, feeding and nursery habitat for numerous species of wildlife. Beaches in this area vary in grain particle size and can be classified as fine sand, shell or perched shell beaches. Sandy and muddy tidal flats are also abundant.

#### Response

LLOG Exploration Offshore, L.L.C. will make every effort to respond to the Worst Case Discharge as effectively as practicable. A description of the response equipment under contract to contain and recover the Worst Case Discharge is shown in **Figure 2**.

Using the estimated chemical and physical characteristics of crude oil, an ADIOS weathering model was run on a similar product from the ADIOS oil database. The results indicate 19% or approximately 5,323 barrels of crude oil would be evaporated/dispersed within 24 hours, with approximately 22,695 barrels remaining.

Natural Weathering Data: MC 816, Well #2	<b>Barrels of Oil</b>
WCD Volume	28,018
Less 19% natural evaporation/dispersion	5,323
Remaining volume	22,695

Figure 2 outlines equipment, personnel, materials and support vessels as well as temporary storage equipment available to respond to the worst case discharge. The volume accounts for the amount remaining after evaporation/dispersion at 24 hours. The list estimates individual times needed for procurement, load out, travel time to the site and deployment. Figure 2 also indicates how operations will be supported.

LLOG Exploration Offshore, L.L.C.'s Oil Spill Response Plan includes alternative response technologies such as dispersants and in-situ burn. Strategies will be decided by Unified Command based on an operations safety analysis, the size of the spill, weather and potential impacts. If aerial dispersants are utilized, 8 sorties (9,600 gallons) from two of the DC-3 aircrafts and 4 sorties (8,000 gallons) from the Basler aircraft would provide a daily dispersant capability of 7,540 barrels. If the conditions are favorable for in-situ burning, the proper approvals have been obtained and the

proper planning is in place, in-situ burning of oil may be attempted. Slick containment boom would be immediately called out and on-scene as soon as possible. Offshore response strategies may include attempting to skim utilizing CGA's spill response equipment with a total derated skimming capacity of 144,940 barrels. Temporary storage associated with skimming equipment equals 4,747 barrels. If additional storage is needed, various tank barges with a total of 141,000 barrels of storage capacity may be mobilized and centrally located to provide temporary storage and minimize off-loading time. Safety is first priority. Air monitoring will be accomplished and operations deemed safe prior to any containment/skimming attempts.

If the spill went unabated, shoreline impact in Plaquemines Parish, Louisiana would depend upon existing environmental conditions. Shoreline protection would include the use of CGA's near shore and shallow water skimmers with a totaled derated skimming capacity of 34,874 barrels. Temporary storage associated with skimming equipment equals 903 barrels. If additional storage is needed, various tank barges with a total of 40,000 barrels of storage capacity may be mobilized and centrally located to provide temporary storage and minimize off-loading time. Onshore response may include the deployment of shoreline boom on beach areas, or protection and sorbent boom on vegetated areas. Master Service Agreements with AMPOL and OMI Environmental will ensure access to 155,350 feet of 18" shoreline protection boom. Figure 2 outlines individual times needed for procurement, load out, travel time to the site and deployment. Strategies would be based upon surveillance and real time trajectories that depict areas of potential impact given actual sea and weather conditions. Applicable Area Contingency Plans (ACPs), Geographic Response Plans (GRPs), and Unified Command (UC) will be consulted to ensure that environmental and special economic resources are correctly identified and prioritized to ensure optimal protection. Shoreline protection strategies depict the protection response modes applicable for oil spill clean-up operations. As a secondary resource, the State of Louisiana Initial Oil Spill Response Plan will be consulted as appropriate to provide detailed shoreline protection strategies and describe necessary action to keep the oil spill from entering Louisiana's coastal wetlands. The UC should take into consideration all appropriate items detailed in Tactics discussion of this Appendix. The UC and their personnel have the option to modify the deployment and operation of equipment to allow for a more effective response to site-specific circumstances. LLOG Exploration Offshore, L.L.C.'s contract Incident Management Team has access to the applicable ACP(s) and GRP(s).

Based on the anticipated worst case discharge scenario, LLOG Exploration Offshore, L.L.C. can be onsite with contracted oil spill recovery equipment with adequate response capacity to contain and recover surface hydrocarbons, and prevent land impact, to the maximum extent practicable, within an estimated 48 hours (based on the equipment's Effective Daily Recovery Capacity (EDRC)).

### **Initial Response Considerations**

Actual actions taken during an oil spill response will be based on many factors to include but not be limited to:

- Safety
- Weather
- Equipment and materials availability
- Ocean currents and tides
- Location of the spill
- Product spilled
- Amount spilled
- Environmental risk assessments
- Trajectory and product analysis
- Well status, i.e., shut in or continual release

LLOG Exploration Offshore, L.L.C. will take action to provide a safe, aggressive response to contain and recover as much of the spilled oil as quickly as it is safe to do so. In an effort to protect the environment, response actions will be designed to provide an "in-depth" protection strategy meant to recover as much oil as possible as far from environmentally sensitive areas as possible. Safety will take precedence over all other considerations during these operations.

Coordination of response assets will be supervised by the designation of a SIMOPS group as necessary for close quarter vessel response activities. Most often, this group will be used during source control events that require a significant number of large vessels operating independently to complete a common objective, in close coordination and support of each other. This group must also monitor the subsurface activities of each vessel (ROV, dispersant application, well control support, etc.). The SIMOPS group leader reports to the Source Control Section Chief.

In addition, these activities will be monitored by the Incident Management Team (IMT) and Unified Command via a structured Common Operating Picture (COP) established to track resource and slick movement in real time.

Upon notification of a spill, the following actions will be taken:

- Information will be confirmed
- An assessment will be made and initial objectives set
- OSROs and appropriate agencies will be notified
- ICS 201, Initial Report Form completed
- Initial Safety plan will be written and published
- Unified Command will be established
  - Overall safety plan developed to reflect the operational situation and coordinated objectives
  - Areas of responsibility established for Source Control and each surface operational site
  - o On-site command and control established

### **Offshore Response Actions**

### **Equipment Deployment**

Surveillance

- Surveillance Aircraft: within two hours of QI notification, or at first light
- Provide trained observer to provide on site status reports
- Provide command and control platform at the site if needed
- Continual surveillance of oil movement by remote sensing systems, aerial photography and visual confirmation
- Continual monitoring of vessel assets using vessel monitoring systems

### Dispersant application assets

- Put ASI on standby
- With the FOSC, conduct analysis to determine appropriateness of dispersant application (refer to Section 18)
- Gain FOSC approval for use of dispersants on the surface
- Deploy aircraft in accordance with a plan developed for the actual situation
- Coordinate movement of dispersants, aircraft, and support equipment and personnel
- Confirm dispersant availability for current and long range operations
- Start ordering dispersant stocks required for expected operations

### Containment boom

- Call out early and expedite deployment to be on scene ASAP
- Ensure boom handling and mooring equipment is deployed with boom
- Provide continuing reports to vessels to expedite their arrival at sites that will provide for their most effective containment
- Use Vessels of Opportunity (VOO) to deploy and maintain boom

### Oceangoing Boom Barge

- Containment at the source
- Increased/enhanced skimmer encounter rate
- Protection booming

### In-situ Burn assets

- Determine appropriateness of in-situ burn operation in coordination with the FOSC and affected SOSC
- Determine availability of fire boom and selected ignition systems
- Start ordering fire boom stocks required for expected operations
- Contact boom manufacturer to provide training & tech support for operations, if required
- Determine assets to perform on water operation
- Build operations into safety plan
- Conduct operations in accordance with an approved plan
- Initial test burn to ensure effectiveness

# Dedicated off-shore skimming systems

General

- Deployed to the highest concentration of oil
- Assets deployed at safe distance from aerial dispersant and in-situ burn operations

### CGA HOSS Barge

- Use in areas with heaviest oil concentrations
- Consider for use in areas of known debris (seaweed, and other floating materials)

### CGA 95' Fast Response Vessels (FRVs)

- Designed to be a first vessel on scene
- Capable of maintaining the initial Command and Control function for on water recovery operations
- 24 hour oil spill detection capability
- Highly mobile and efficient skimming capability
- Use as far off-shore as safely possible

### CGA FRUs

- To the area of the thickest oil
- Use as far off-shore as allowed
- VOOs 140' 180' in length
- VOOs with minimum of 18' x 38' or 23' x 50' of optimum deck space
- VOOs in shallow water should have a draft of <10 feet when fully loaded

### T&T Koseq Skimming Systems

- To the area of the thickest oil
- Use as far off-shore as allowed
- VOOs with a minimum of 2,000 bbls storage capacity
- VOOs at least 200' in length
- VOOs with deck space of 100' x 40' to provide space for arms, tanks, and crane
- VOOs for shallow water should be deck barges with a draft of <10 feet when fully loaded

### Storage Vessels

- Establish availability of CGA contracted assets (See Appendix E)
- Early call out (to allow for tug boat acquisition and deployment speeds)
- Phase mobilization to allow storage vessels to arrive at the same time as skimming systems
- Position as closely as possible to skimming assets to minimize offloading time

### Vessels of Opportunity (VOO)

- Use LLOG Exploration Offshore, L.L.C.'s contracted resources as applicable
- Industry vessels are ideal for deployment of Vessel of Opportunity Skimming Systems (VOSS)
- Acquire additional resources as needed
- Consider use of local assets, i.e. fishing and pleasure craft for ISB operations or boom tending
- Expect mission specific and safety training to be required
- Plan with the US Coast Guard for vessel inspections
- Place VOOs in Division or Groups as needed
- Use organic on-board storage if appropriate
- Maximize non-organic storage appropriate to vessel limitations
- Decant as appropriate after approval to do so has been granted
- Assign bulk storage barges to each Division/Group
- Position bulk storage barges as close to skimming units as possible
- Utilize large skimming vessel (e.g. barges) storage for smaller vessel offloading
- Maximize skimming area (swath) to the optimum width given sea conditions and available equipment
- Maximize use of oleophilic skimmers in all operations, but especially offshore
- Nearshore, use shallow water barges and shuttle to skimming units to minimize offloading time
- Plan and equip to use all offloading capabilities of the storage vessel to minimize offloading time

### Adverse Weather Operations:

In adverse weather, when seas are  $\geq 3$  feet, the use of larger recovery and storage vessels, oleophilic skimmers, and large offshore boom will be maximized. KOSEQ Arm systems are built for rough conditions, and they should be used until their operational limit (9.8' seas) is met. Safety will be the overriding factor in all operations and will cease at the order of the Unified Command, vessel captain, or in an emergency, "stop work" may be directed by any crew member.

### Surface Oil Recovery Considerations and Tactics (Offshore and Near-shore Operations)

### Maximization of skimmer-oil encounter rate

- Place barges in skimming task forces, groups, etc., to reduce recovered oil offloading time
- Place barges alongside skimming systems for immediate offloading of recovered oil when practicable
- Use two vessels, each with heavy sea boom, in an open-ended "V" configuration to funnel surface oil into a trailing skimming unit's organic, V-shaped boom and skimmer (see page 7, *CGA Equipment Guide Book and Tactic Manual* (CGATM)

- Use secondary vessels and heavy sea boom to widen boom swath beyond normal skimming system limits (see page 15, CGATM)
- Consider night-time operations, first considering safety issues
- Utilize all available advanced technology systems (IR, X-Band Radar, etc.) to determine the location of, and move to, recoverable oil
- Confirm the presence of recoverable oil prior to moving to a new location

#### Maximize skimmer system efficiency

- Place weir skimming systems in areas of calm seas and thick oil
- Maximize the use of oleophilic skimming systems in heavier seas
- Place less mobile, high EDRC skimming systems (e.g. HOSS Barge) in the largest pockets of the heaviest oil
- Maximize onboard recovered oil storage for vessels.
- Obtain authorization for decanting of recovered water as soon as possible
- Use smaller, more agile skimming systems to recover streamers of oil normally found farther from the source. Place recovered oil barges nearby

#### Recovered Oil Storage

- Smaller barges in larger quantities will increase flexibility for multi-location skimming operations
- Place barges in skimming task forces, groups, etc., to reduce recovered oil offloading time
- Procure and deploy the maximum number of portable tanks to support Vessel of Opportunity Skimming Systems if onboard storage is not available
- Maximize use of the organic recovered oil storage capacity of the skimming vessel

# Command, Control, and Communications $(C^3)$

- Publish, implement, and fully test an appropriate communications plan
- Design an operational scheme, maintaining a manageable span of control
- Designate and mark C<sup>3</sup> vessels for easy aerial identification
- Designate and employ C<sup>3</sup> aircraft for task forces, groups, etc.
- Use reconnaissance air craft and Rapid Response Teams (RAT) to confirm the presence of recoverable oil

#### On Water Recovery Group

When the first skimming vessel arrives on scene, a complete site assessment will be conducted before recovery operations begin. Once it is confirmed that the air monitoring readings for O2, LEL, H2S, CO, VOC, and Benzene are all within the permissible limits, oil recovery operations may begin.

As skimming vessels arrive, they will be organized to work in areas that allow for the most efficient vessel operation and free vessel movement in the recovery of oil. Vessel groups will vary in structure as determined by the Operations Section of the Unified Command, but will generally consist, at a minimum, of the following dedicated assets:

- 3 to 5 Offshore skimming vessels (recovery)
- 1 Tank barge (temporary storage)
- 1 Air asset (tactical direction)
- 2 Support vessels (crew/utility for supply)
- 6 to 10 Boom vessels (enhanced booming)

*Example (Note:* Actual organization of TFs will be dependent on several factors including, asset availability, weather, spilled oil migration, currents, etc.)

The 95' FRV Breton Island out of Venice arrives on scene and conducts an initial site assessment. Air monitoring levels are acceptable and no other visual threats have been observed. The area is cleared for safe skimming operations. The Breton Island assumes command and control (CoC) of on-water recovery operations until a dedicated non-skimming vessel arrives to relieve it of those duties.

A second 95' FRV arrives and begins recovery operations alongside the Breton Island. Several more vessels begin to arrive, including a third 95' FRV out of Galveston, the HOSS Barge (High Volume Open Sea Skimming System) out of Harvey, a boom barge (CGA 300) with 25,000' of 42" auto boom out of Leeville, and 9 Fast Response Units (FRUs) from the load-out location at C-Port in Port Fourchon.

As these vessels set up and begin skimming, they are grouped into task forces (TFs) as directed by the Operations Section of the Unified Command located at the command post.

Initial set-up and potential actions:

- A 1,000 meter safety zone has been established around the incident location for vessels involved in Source Control
- The HOSS Barge is positioned facing the incident location just outside of this safety zone or at the point where the freshest oil is reaching the surface
- The HOSS Barge engages its Oil Spill Detection (OSD) system to locate the heaviest oil and maintains that ability for 24-hour operations

- The HOSS Barge deploys 1,320' of 67" Sea Sentry boom on each side, creating a swath width of 800'
- The Breton Island and H.I. Rich skim nearby, utilizing the same OSD systems as the HOSS Barge to locate and recover oil
- Two FRUs join this group and it becomes TF1
- The remaining 7 FRUs are split into a 2 and 3 vessel task force numbered TF2 and TF3
- A 95' FRV is placed in each TF
- The boom barge (CGA 300) is positioned nearby and begins deploying auto boom in sections between two utility vessels (1,000' to 3,000' of boom, depending on conditions) with chain-link gates in the middle to funnel oil to the skimmers
- The initial boom support vessels position in front of TF2 and TF3
- A 100,000+ barrel offshore tank barge is placed with each task force as necessary to facilitate the immediate offload of skimming vessels

The initial task forces (36 hours in) may be structured as follows:

#### **TF 1**

- 1 95' FRV
- 1 HOSS Barge with 3 tugs
- 2 FRUs
- 1-100,000+ barrel tank barge and associated tug(s)
- 1 Dedicated air asset for tactical direction
- 8-500' sections of auto boom with gates
- 8 Boom-towing vessels
- 2 Support vessels (crew/utility)

#### TF 2

- 1-95' FRV
- 4 FRUs
- 1 100,000+ barrel tank barge and associated tug(s)
- 1 Dedicated air asset for tactical direction
- 10-500' sections of auto boom with gates
- 10 Boom-towing vessels
- 2 Support vessels (crew/utility)

#### **TF 3**

- 1 95' FRV
- 3 FRUs
- 1-100,000+ barrel tank barge and associated tug(s)
- 1 Dedicated air asset for tactical direction
- 8-500' sections of auto boom with gates
- 8 Boom-towing vessels
- 2 Support vessels (crew/utility)

Offshore skimming equipment continues to arrive in accordance with the ETA data listed in figure H.3a; this equipment includes 2 AquaGuard skimmers and 11 sets of Koseq Rigid Skimming Arms. These high volume heavy weather capable systems will be divided into functional groups and assigned to specific areas by the Operations Section of the Unified Command.

At this point of the response, the additional TFs may assume the following configurations:

# **TF 4**

- 2 Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 AquaGuard Skimmer
- 1 100,000+ barrel tank barge and associated tug(s)
- 1 Dedicated air asset for tactical direction
- 2 Support vessels (crew/utility)
- 6-500' sections of auto boom with gates
- 6 Boom-towing vessels

# TF 5

- 3 Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 AquaGuard Skimmer
- 1 100,000+ barrel tank barge and associated tug(s)
- 1 Dedicated air asset for tactical direction
- 2 Support vessels (crew/utility)
- 8-500' sections of auto boom with gates
- 8 Boom-towing vessels

# TF 6

- 3 Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1-100,000+ barrel tank barge and associated tug(s)
- 1 Dedicated air asset for tactical direction
- 2 Support vessels (crew/utility)
- 6-500' sections of auto boom with gates
- 6 Boom-towing vessels

# **TF 7**

- 3 Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 100,000+ barrel tank barge and associated tug(s)
- 1 Dedicated air asset for tactical direction
- 2 Support vessels (crew/utility)
- 6-500' sections of auto boom with gates
- 6-Boom-towing vessels

#### CGA Minimum Acceptable Capabilities for Vessels of Opportunity (VOO)

Minimum acceptable capabilities of Petroleum Industry Designed Vessels (PIDV) for conducting Vessel of Opportunity (VOO) skimming operations are shown in the table below. PIDVs are "purpose-built" to provide normal support to offshore oil and gas operators. They include but are not limited to utility boats, offshore supply vessels, etc. They become VOOs when tasked with oil spill response duties.

Capability	FRU	KOSEQ	AquaGuard
Type of Vessel	Utility Boat	Offshore Supply Vessel	Utility Boat
<b>Operating parameters</b>			
Sea State	3-5 ft max	9.8 ft max	3-5 ft max
Skimming speed	≤1 kt	$\leq$ 3 kts	≤1 kt
Vessel size			
Minimum Length	100 ft	200 ft	100 ft
Deck space for: • Tank(s) • Crane(s) • Boom Reels • Hydraulic Power Units • Equipment Boyes	18x32 ft	100x40 ft	18x32 ft
Communication Assets	Marine Band Radio	Marine Band Radio	Marine Band Radio

**Tactical use of Vessels of Opportunity (VOO):** LLOG Exploration Offshore, L.L.C. will take all possible measures to maximize the oil-to-skimmer encounter rate of all skimming systems, to include VOOs, as discussed in this section. VOOs will normally be placed within an On-water recovery unit as shown in figures below.

**Skimming Operations:** PIDVs are the preferred VOO skimming platform. OSROs are more versed in operating on these platforms and the vessels are generally large enough with crews more likely versed in spill response operations. They also have a greater possibility of having on-board storage capacity and the most likely vessels to be under contract, and therefore more readily available to the operator. These vessels would normally be assigned to an on-water recovery group/division (see figure below) and outfitted with a VOSS suited for their size and capabilities. Specific tactics used for skimming operations would be dependent upon many parameters which include, but are not limited to, safety concerns, weather, type VOSS on board, product being recovered, and area of oil coverage. Planners would deploy these assets with the objective of safely maximizing oil- to-skimmer encounter rate by taking actions to minimize non-skimming time and maximizing boom swath. Specific tactical configurations are shown in figures below.

**The Fast Response Unit (FRU)**: A self-contained, skid based, skimming system that is deployed from the right side of a vessel of opportunity (VOO). An outrigger holds a 75' long section of air inflatable boom in place that directs oil to an apex for recovery via a Foilex 250 weir skimmer. The outrigger creates roughly a 40' swath width dependent on the VOO beam. The lip of the collection bowl on the skimmer is placed as close to the oil and water interface as possible to maximize oil recovery and minimize water retention. The skimmer then pumps all fluids recovered to the storage tank where it is allowed to settle, and with the approval of the containment boom to be recycled through the system. Once the tank is full of as much pure recovered oil as possible it is offloaded to a storage barge for disposal in accordance with an approved disposal plan. A second 100 barrel storage tank can be added if the appropriate amount of deck space is available to use as secondary storage.

# **Tactical Overview**

*Mechanical Recovery* – The FRU is designed to provide fast response skimming capability in the offshore and nearshore environment in a stationary or advancing mode. It provides a rated daily recovery capacity of 4,100 barrels. An additional boom reel with 440' of offshore boom can be deployed along with the FRU, and a second support vessel for boom towing, to extend the swath width when attached to the end of the fixed boom. The range and sustainability offshore is dependent on the VOO that the unit is placed on, but generally these can stay offshore for extended periods. The FRU works well independently or assigned with other on-water recovery assets in a task force. In either case, it is most effective when a designated aircraft is assigned to provide tactical direction to ensure the best placement in recoverable oil.

*Maximum Sea Conditions* – Under most circumstances the FRU can maintain standard oil spill recovery operations in 2' to 4' seas. Ultimately, the Coast Guard licensed Captain in charge of the VOO (with input from the CGAS Supervisor assigned) will be responsible to determine when the sea conditions have surpassed the vessel's safe operating capabilities.

Possible Task Force Configuration (Multiple VOOs can be deployed in a task force)

- 1 VOO (100' to 165' Utility or Supply Vessel)
- 1 Boom reel w/support vessel for towing
- 1 Tank barge (offshore) for temporary storage
- 1 Utility/Crewboat (supply)
- 1 Designated spotter aircraft



The VOSS (yellow) is being deployed and connected to an out-rigged arm. This is suitable for collection in both large pockets of oil and for recovery of streaming oil. The oil-to-skimmer encounter rate is limited by the length of the arm. Skimming pace is  $\leq 1$  knot.



Through the use of an additional VOO, and using extended sea boom, the swath of the VOSS is increased therefore maximizing the oil-to-skimmer encounter rate. Skimming pace is  $\leq 1$  knot.

The Koseq Rigid Sweeping Arm: A skimming system deployed on a vessel of opportunity. It requires a large Offshore or Platform Supply Vessel (OSV/PSV), greater than 200' with at least 100' x 50' of free deck space. On each side of the vessel, a 50' long rigid framed Arm is deployed that consists of pontoon chambers to provide buoyancy, a smooth nylon face, and a hydraulically adjustable mounted weir skimmer. The Arm floats independently of the vessel and is attached by a tow bridle and a lead line. The movement of the vessel forward draws the rubber end seal of the arm against the hull to create a collection point for free oil directed to the weir by the Arm face. The collection weir is adjusted to keep the lip as close to the oil water interface as possible to maximize oil recovery while attempting to minimize excess water collection. A transfer pump (combination of positive displacement, screw type and centrifuge suited for highly viscous oils) pump the recovered liquid to portable tanks and/or dedicated fixed storage tanks onboard the vessel. After being allowed to sit and separate, with approval from the Coast Guard, the water can be decanted (pumped off) in front of the collection arm to be reprocessed through the system. Once full with as much pure recovered oil as possible, the oil is transferred to a temporary storage barge where it can be disposed of in accordance with an approved disposal plan.

#### **Tactical Overview**

*Mechanical Recovery* – Deployed on large vessels of opportunity (VOO) the Koseq Rigid Sweeping Arms are high volume surge capacity deployed to increase recovery capacity at the source of a large oil spill in the offshore and outer nearshore environment of the Gulf of Mexico. They are highly mobile and sustainable in rougher sea conditions than normal skimming vessels (9.8' seas). The large Offshore Supply Vessels (OSV) required to deploy the Arms are able to remain on scene for extended periods, even when sea conditions pick up. Temporary storage on deck in portable tanks usually provides between 1,000 and 3,000 bbls. In most cases, the OSV will be able to pump 20% of its deadweight into the liquid mud tanks in accordance with the vessels Certificate of Inspection (COI). All storage can be offloaded utilizing the vessels liquid transfer system.

*Maximum Sea Conditions* - Under most circumstances the larger OSVs are capable of remaining on scene well past the Skimming Arms maximum sea state of 9.8'. Ultimately it will be the decision of the VOO Captain, with input from the T&T Supervisor onboard, to determine when the sea conditions have exceeded the safe operating conditions of the vessel.

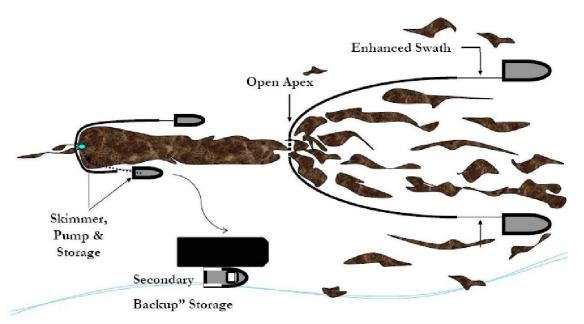
*Command and Control* – The large OSVs in many cases have state of the art communication and electronic systems, as well as the accommodations to support the function of directing all skimming operations offshore and reporting back to the command post.

Possible Task Force Configuration (Multiple Koseq VOOs can be deployed in a task force)

 $1 \ge 200$ ' Offshore Supply Vessels (OSV) with set of Koseq Arms

2 to 4 portable storage tanks (500 bbl)

- 1 Modular Crane Pedestal System set (MCPS) or 30 cherry picker (crane) for deployment
- 1 Tank barge (offshore) for temporary storage
- 1 Utility/Crewboat (supply)
- 1-Designated spotter aircraft
- 4 Personnel (4 T&T OSRO)



Scattered oil is "caught" by two VOO and collected at the apex of the towed sea boom. The oil moves thought a "gate" at that apex, forming a larger stream of oil which moves into the boom of the skimming vessel. Operations are paced at >1. A recovered oil barge stationed nearby to minimize time taken to offload recovered oil.





This is a depiction of the same operation as above but using KOSEQ Arms. In this configuration, the collecting boom speed dictates the operational pace at  $\geq 1$  knot to minimize entrainment of the oil.

# Clean Gulf Associates (CGA) Procedure for Accessing Member-Contracted and other Vessels of Opportunity (VOOs) for Spill Response

- CGA has procedures in place for CGA member companies to acquire vessels of opportunity (VOOs) from an existing CGA member's contracted fleet or other sources for the deployment of CGA portable skimming equipment including Koseq Arms, Fast Response Units (FRUs) and any other portable skimming system(s) deemed appropriate for the response for a potential or actual oil spill, WCD oil spill or a Spill of National Significance (SONS).
- CGA uses Port Vision, a web-based vessel and terminal interface that empowers CGA to track vessels through Automatic Identification System (AIS) and terminal activities using a Geographic Information System (GIS). It provides live AIS/GIS views of waterways showing current vessel positions, terminals, created vessel fleets, and points-of-interest. Through this system, CGA has the ability to get instant snapshots of the location and status of all vessels contracted to CGA members, day or night, from any web-enabled PC.

#### **Near Shore Response Actions**

#### Timing

- Put near shore assets on standby and deployment in accordance with planning based on the actual situation, actual trajectories and oil budgets
- VOO identification and training in advance of spill nearing shoreline if possible
- Outfitting of VOOs for specific missions
- Deployment of assets based on actual movement of oil

# **Considerations**

- Water depth, vessel draft
- Shoreline gradient
- State of the oil
- Use of VOOs
- Distance of surf zone from shoreline

# Surveillance

- Provide trained observer to direct skimming operations
- Continual surveillance of oil movement by remote sensing systems, aerial photography and visual confirmation
- Continual monitoring of vessel assets

# Dispersant Use

- Generally will not be approved within 3 miles of shore or with less than 10 meters of water depth
- Approval would be at Regional Response Team level (Region 6)

# Dedicated Near Shore skimming systems

- FRVs
- Egmopol and Marco SWS
- Operate with aerial spotter directing systems to observed oil slicks

# VOO

- Use LLOG Exploration Offshore, L.L.C.'s contracted resources as applicable
- Industry vessel are usually best for deployment of Vessel of Opportunity Skimming Systems (VOSS)
- Acquire additional resources as needed
- Consider use of local assets, i.e. fishing and pleasure craft
- Expect mission specific and safety training to be required
- Plan with the US Coast Guard for vessel inspections
- Operate with aerial spotter directing systems to oil patches

#### **Shoreline Protection Operations**

Response Planning Considerations

- Review appropriate Area Contingency Plan(s)
- Locate and review appropriate Geographic Response and Site Specific Plans
- Refer to appropriate Environmentally Sensitive Area Maps
- Capability for continual analysis of trajectories run periodically during the response
- Environmental risk assessments (ERA) to determine priorities for area protection
- Time to acquire personnel and equipment and their availability
- Refer to the State of Louisiana Initial Oil Spill Response Plan, Deep Water Horizon, dated 2 May 2010, as a secondary reference
- Aerial surveillance of oil movement
- Pre-impact beach cleaning and debris removal
- Shoreline Cleanup Assessment Team (SCAT) operations and reporting procedures
- Boom type, size and length requirements and availability
- Possibility of need for In-situ burning in near shore areas
- Current wildlife situation, especially status of migratory birds and endangered species in the area
- Check for Archeological sites and arrange assistance for the appropriate state agency when planning operations the may impact these areas

#### Placement of boom

- Position boom in accordance with the information gained from references listed above and based on the actual situation
- Determine areas of natural collection and develop booming strategies to move oil into those areas
- Assess timing of boom placement based on the most current trajectory analysis and the availability of each type of boom needed. Determine an overall booming priority and conduct booming operations accordingly. Consider:
  - Trajectories
  - Weather forecast
  - Oil Impact forecast
  - Verified spill movement
  - Boom, manpower and vessel (shallow draft) availability
  - Near shore boom and support material, (stakes, anchors, line)

#### Beach Preparation - Considerations and Actions

- Use of a 10 mile go/no go line to determine timing of beach cleaning
- SCAT reports and recommendations
- Determination of archeological sites and gaining authority to enter
- Monitoring of tide tables and weather to determine extent of high tides
- Pre cleaning of beaches by moving waste above high tide lines to minimize waste
- Determination of logistical requirements and arranging of waste removal and disposal

- Staging of equipment and housing of response personnel as close to the job site as possible to maximize on-site work time
- Boom tending, repair, replacement and security (use of local assets may be advantageous)
- Constant awareness of weather and oil movement for resource re-deployment as necessary
- Earthen berms and shoreline protection boom may be considered to protect sensitive inland areas
- Requisitioning of earth moving equipment
- Plan for efficient and safe use of personnel, ensuring:
  - A continual supply of the proper Personal Protective Equipment
  - Heating or cooling areas when needed
  - Medical coverage
  - Command and control systems (i.e. communications)
  - Personnel accountability measures
- Remediation requirements, i.e., replacement of sands, rip rap, etc.
- Availability of surface washing agents and associated protocol requirements for their use (see National Contingency Plan Product Schedule for list of possible agents)
- Discussions with all stakeholders, i.e., land owners, refuge/park managers, and others as appropriate, covering the following:
  - Access to areas
  - Possible response measures and impact of property and ongoing operations
  - Determination of any specific safety concerns
  - Any special requirements or prohibitions
  - Area security requirements
  - Handling of waste
  - Remediation expectations
  - Vehicle traffic control
  - Domestic animal safety concerns
  - Wildlife or exotic game concerns/issues

# Inland and Coastal Marsh Protection and Response

- Considerations and Actions
  - All considered response methods will be weighed against the possible damage they may do to the marsh. Methods will be approved by the Unified Command only after discussions with local Stakeholder, as identified above.
    - In-situ burn may be considered when marshes have been impacted
  - Passive clean up of marshes should considered and appropriate stocks of sorbent boom and/or sweep obtained.
  - Response personnel must be briefed on methods to traverse the marsh, i.e.,
    - use of appropriate vessel
    - use of temporary walkways or road ways
  - Discuss and gain approval prior cutting or moving vessels through vegetation
  - Discuss use of vessels that may disturb wildlife, i.e, airboats
  - Safe movement of vessels through narrow cuts and blind curves

- Consider the possibility that no response in a marsh may be best
- In the deployment of any response asset, actions will be taken to ensure the safest, most efficient operations possible. This includes, but is not limited to:
  - Placement of recovered oil or waste storage as near to vessels or beach cleanup crews as possible.
  - Planning for stockage of high use items for expeditious replacement
  - Housing of personnel as close to the work site as possible to minimize travel time
  - Use of shallow water craft
  - Use of communication systems appropriate ensure command and control of assets
  - o Use of appropriate boom in areas that I can offer effective protection
  - Planning of waste collection and removal to maximize cleanup efficiency
- Consideration or on-site remediation of contaminated soils to minimize replacement operations and impact on the area

#### **Decanting Strategy**

Recovered oil and water mixtures will typically separate into distinct phases when left in a quiescent state. When separation occurs, the relatively clean water phase can be siphoned or decanted back to the recovery point with minimal, if any, impact. Decanting therefore increases the effective on-site oil storage capacity and equipment operating time. FOSC/SOSC approval will be requested prior to decanting operations. This practice is routinely used for oil spill recovery.

#### **CGA Equipment Limitations**

The capability for any spill response equipment, whether a dedicated or portable system, to operate in differing weather conditions will be directly in relation to the capabilities of the vessel the system in placed on. Most importantly, however, the decision to operate will be based on the judgment of the Unified Command and/or the Captain of the vessel, who will ultimately have the final say in terminating operations. Skimming equipment listed below may have operational limits which exceed those safety thresholds. As was seen in the Deepwater Horizon (DWH) oil spill response, vessel skimming operations ceased when seas reached 5-6 feet and vessels were often recalled to port when those conditions were exceeded. Systems below are some of the most upto-date systems available and were employed during the DWH spill.

Boom	3 foot seas, 20 knot winds
Dispersants	Winds more than 25 knots
	Visibility less than 3 nautical miles
	Ceiling less than 1,000 feet.
FRU	8 foot seas
HOSS Barge/OSRB	8 foot seas
Koseq Arms	8 foot seas
OSRV	4 foot seas

#### **Environmental Conditions in the GOM**

Louisiana is situated between the easterly and westerly wind belts, and therefore, experiences westerly winds during the winter and easterly winds in the summer. Average wind speed is generally 14-15 mph along the coast. Wave heights average 4 and 5 feet. However, during hurricane season, Louisiana has recorded wave heights ranging from 40 to 50 feet high and winds reaching speeds of 100 mph. Because much of southern Louisiana lies below sea level, flooding is prominent.

Surface water temperature ranges between 70 and 80  $^{\circ}$ F during the summer months. During the winter, the average temperature will range from 50 and 60  $^{\circ}$ F.

The Atlantic and Gulf of Mexico hurricane season is officially from 1 June to 30 November. 97% of all tropical activity occurs within this window. The Atlantic basin shows a very peaked season from August through October, with 78% of the tropical storm days, 87% of the minor (Saffir-Simpson Scale categories 1 and 2) hurricane days, and 96% of the major (Saffir-Simpson categories 3, 4 and 5) hurricane days occurring then. Maximum activity is in early to mid September. Once in a few years there may be a hurricane occurring "out of season" - primarily in May or December. Globally, September is the most active month and May is the least active month.

#### FIGURE 1 TRAJECTORY BY LAND SEGMENT

Trajectory of a spill and the probability of it impacting a land segment have been projected utilizing LLOG Exploration Offshore, L.L.C.'s WCD and information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf of Mexico available on the BOEM website using 30 day impact. The results are tabulated below.

Area/Block	OCS-G	Launch Area	Land Segment and/or Resource	Conditional Probability (%)
MC 816, Well #2 59 miles from shore	G33178	C59	Cameron, LA Vermilion, LA Terrebonne, LA Lafourche, LA Jefferson, LA <b>Plaquemines, LA</b> St. Bernard, LA Walton, FL Bay, FL	1 1 2 2 1 1 1 1 2 1 1

#### WCD Scenario- BASED ON WELL BLOWOUT DURING DRILLING OPERATIONS (63 miles from shore)

22,695 bbls of crude oil (Volume considering natural weathering) API Gravity 30.8°

	· · · · · · · · · · · · · · · · · · ·	Dis	spersants/Surveilla	nce							
Dispersant/Surveillance	Dispersant Capacity (gal)	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to site	Total Hrs				
			ASI	vi							
Basler 67T	2000	2	Houma	2	2	0.8	4.8				
DC 3	1200	2	Houma	2	2	1	5				
DC 3	1200	2	Houma	2	2	1	5				
Aero Commander	NA	2	Houma	2	2	0.8	4.8				
	MSRC										
C-130 Spray AC	4,125	3	Kiln	4	0	0.5	4.5				
King Air BE90 Spray AC	250	2	Kiln	4	0	0.8	4.8				

# FIGURE 2 – Equipment Response Time to MC 816, Well #2

Offshore Equipment Pre-Determined Staging	EDRC	Storage Capacity	V00	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
CGA											
HOSS Barge	76285	4000	3 Tugs	12	Harvey	6	0	12	8	2	28
95' FRV	22885	249	NA	6	Leeville	2	0	2	5	1	10
95' FRV	22885	249	NA	6	Venice	2	0	3	3	1	9
95' FRV	22885	249	NA	6	Vermilion	2	0	3	9	1	15
Boom Barge (CGA-300) 42" Auto Boom (25000')	NA	NA	1 Tug 50 Crew	4 (Barge) 2 (Per Crew)	Leeville	8	0	4	15	2	29
		Ente	erprise Marine	e Services LLC (A	vailable through	contract wit	th CGA)				
CTCo 2603	NA	25000	1 Tug	6	Amelia	18	0	6	23	1	48
CTCo 2607	NA	23000	1 Tug	6	Amelia	18	0	6	23	1	48
CTCo 2608	NA	23000	1 Tug	6	Amelia	18	0	6	23	1	48
CTCo 2609	NA	23000	1 Tug	6	Amelia	18	0	6	23	1	48
CTCo 5001	NA	47000	1 Tug	6	Amelia	18	0	6	23	1	48

#### Offehous Dospours

Staging Area: Venice		×						2		2001	
Offshore Equipment Preferred Staging	EDRC	Storage Capacity	V00	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Site	Hrs to Deploy	Total Hrs
CGA											
Hydro-Fire Boom	NA	NA	8 Utility	40	Harvey	0	24	2	6	6	38
				MS	SRC		71				
67" Curtain Pressure Boom (53570')	NA	NA	80*	160	Houston	1	2	12	6	1	22
1000' Fire Resistant Boom	NA	NA	3*	6	Galveston	1	4	13	6	6	30
16000' Fire Resistant Boom	NA	NA	3*	6	Houston	1	4	12	6	6	29
2000' Hydro Fire Boom	NA	NA	8*	8	Lake Charles	1	4	8	6	6	25

\* Utility Boats, Crew Boats, Supply Boats, or Fishing Vessels

Nearshore Response											
Nearshore Equipment Pre-determined Staging	EDRC	Storage Capacity	V00	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
CGA											
46' FRV	15257	65	NA	4	Venice	2	0	2	2	1	7
		En	terprise Mari	ine Services L	LC (Available through	contract with	n CGA)				
CTCo 2605	NA	20000	1 Tug	6	Amelia	25	0	6	16	1	48
CTCo 2606	NA	20000	1 Tug	6	Amelia	25	0	6	16	1	48

#### **Staging Area: Venice**

Nearshore Equipment With Staging	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Load Out	Travel to Staging	Travel to Deployment	Hrs to Deploy	Total Hrs
CGA											
SWS Egmopol	1810	100	NA	3	Galveston	2	2	13	2	1	20
SWS Egmopol	1810	100	NA	3	Leeville	2	2	4.5	2	1	11.5
SWS Marco	3588	20	NA	3	Vermilion	2	2	8	2	1	15
SWS Marco	3588	34	NA	3	Leeville	2	2	4.5	2	1	11.5
SWS Marco	3588	34	NA	3	Venice	2	2	2	2	1	9
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Vermilion	4	12	8	2	2	28
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Galveston	4	12	13	2	2	33
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Harvey	4	12	2	2	2	22
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Vermilion	2	2	8	2	1	15
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Harvey	2	2	2	2	1	9
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Vermilion	2	2	8	2	1	15
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Harvey	2	2	2	2	1	9

#### Shoreline Protection

Staging Area: Ven	ice			renne i roneer		25.Y		10-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	20		
Shoreline Protection Boom	VOO	Persons Req.	Storage/Warehouse Location	Hrs to Procure	Hrs to Loadout	Travel to Venice	Travel to Deployment Site	Hrs to Deploy	Total Hrs		
	AMPOL (Available through MSA)										
34,050' 18" Boom	13 Crew	26	New Iberia, LA	2	2	6	2	12	24		
12,850' 18" Boom	7 Crew	14	Chalmette, LA	2	2	2.5	2	6	14.5		
900' 18" Boom	1 Crew	2	Morgan City, LA	2	2	4.5	2	2	12.5		
3,200' 18" Boom	2 Crew	4	Venice, LA	2	2	0	2	2	8		
12,750' 18" Boom	7 Crew	14	Port Arthur, TX	2	2	10	2	6	22		
			OMI Environme	ental (Available	e through MS.	A)		Ex UT			
14,000' 18" Boom	6 Crew	12	Belle Chasse, LA	1	1	2	2	3	9		
2,000' 18" Boom	1 Crew	2	Galliano, LA	1	1	4	2	3	11		
1,800' 18" Boom	1 Crew	2	Gonzalez, LA	1	1	4	2	3	11		
11,800' 18" Boom	5 Crew	10	Harvey, LA	1	1	2	2	3	9		
2,000' 18" Boom	2 Crew	4	Houma, LA	1	1	4	2	3	11		
2,400' 18" Boom	2 Crew	4	Morgan City, LA	1	1	5	2	3	12		
3,800' 18" Boom	2 Crew	4	New Iberia, LA	1	1	6	2	3	13		
2,300' 18" Boom	2 Crew	4	Port Allen, LA	1	1	5	2	3	12		
1,500' 18" Boom	1 Crew	2	Venice, LA	1	1	0	2	3	7		
19,000' 18" Boom	6 Crew	12	Deer Park, TX	1	1	12	2	3	19		
11,000' 18" Boom	5 Crew	10	La Marque, TX	1	1	13	2	3	20		
20,000' 18" Boom	6 Crew	12	Port Arthur, TX	1	1	10	2	3	17		

Wildlife Response	EDRC	Storage Capacity	<b>V00</b>	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Deployment	Hrs to Deploy	Total Hrs
CGA											
Wildlife Support Trailer	NA	NA	NA	2	Harvey	2	2	2	1	2	9
Bird Scare Guns (48)	NA	NA	NA	2	Harvey	2	2	2	1	2	9
Bird Scare Guns (12)	NA	NA	NA	2	Galveston	2	2	13	1	2	20
Bird Scare Guns (12)	NA	NA	NA	2	Aransas Pass	2	2	18	1	2	25
Bird Scare Guns (24)	NA	NA	NA	2	Vermilion	2	2	8	1	2	15
Bird Scare Guns (24)	NA	NA	NA	2	Leeville	2	2	4.4	1	2	11.4

Response Asset	Total (bbls)
Offshore EDRC	144,940
Offshore Recovered Oil Storage	145,747
Nearshore / Shallow Water EDRC	34,874
Nearshore / Shallow Water Recovered Oil Storage	40,903

# APPENDIX M RELATED FACILITIES AND OPERATIONS INFORMATION (30FR PART 550.256)

#### A. Related OCS Facilities and Operations –

A new infield umbilical will be installed to distribute chemicals, hydraulic control fluid, power, and communication for the Mississippi Canyon 816 Well SS003. via two (2) proposed Umbilical Termination Assemblies (UTAs) near MC 816 Well SS002 and SS003.

This is an existing manned platform and will process produced hydrocarbons from the incoming subsea wells for Mississippi Canyon Block 816 Well SS001, SS002 and SS003.

An approximately 5,620.40' long x 3.6" Lease Term Umbilical from an additional UTA located near MC 816 Well No. SS002 to another UTA located near the MC 816 Well No. SS003.

# APPENDIX R ADMINISTRATIVE INFORMATION

#### A. EXEMPTED INFORMATION

Proprietary information included in the proprietary copy of this Development Operations Coordination Document

- BHL, TVD and MD information on form BOEM 0137 (OCS Plan Information Form)
- Production Rates and Life of Reserves
- New and Unusual Technologies
- All items and enclosures under Geological and Geophysical Information

#### B. BIBLIOGRAPHY

Any previously submitted EP, DPP, or DOCD, study report, survey report; or other material referenced in this DOCD or it's accompanying information is listed below:

- Initial Exploration Plan (N-9965) Mississippi Canyon 816 submitted by LLOG Exploration Offshore, LLC and approved 06/21/2013.
- Revised Exploration Plan (R-6094) Mississippi Canyon 816 submitted by LLOG Exploration Offshore, LLC and approved 04/30/2014.
- Supplemental Exploration Plan (S-7929) Mississippi Canyon 816 submitted by LLOG Exploration Offshore, LLC and approved 04/18/2019.
- Initial Development Coordination Document (N-10154) Mississippi Canyon 816 submitted by LLOG Exploration Offshore, L.L.C. and approved 8/20/2021.
- LLOG Exploration Offshore LLC's approved Regional Oil Spill Response Plan
- Berger Geosciences, LLC Shallow Hazards Assessment, Benthic Communities Evaluation, and Archaeological Resource Survey submitted to Minerals Management Service (BOEMRE) under separate cover on November 9, 2010.
- Berger Geosciences, LLC Shallow Hazards Assessment, Benthic Communities Evaluation, and Archaeological Resource Survey for MC 816-A Amended Revised and MC 816-D Amended on behalf of LLOG Exploration Offshore, Inc. The report was submitted to BOEM under separate cover on January 9, 2013.