UNITED STATES GOVERNMENT January 4, 2022
MEMORANDUM

To: Public Information

From: Plan Coordinator, OLP, Plans Section (GM 235D)

Subject: Public Information copy of plan

Control #	-	N-10204
Type	-	Initial Exploration Document
Lease(s)	-	OCS-G35295 Block - 877 Ewing Bank Area OCS-G36876 Block - 921 Ewing Bank Area
Operator	-	LLOG Exploration Offshore, L.L.C.
Description	-	Subsea Wells E and Alt E
Rig Type	-	Not Found

Attached is a copy of the subject plan.

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

Nawaz Khasraw
Plan Coordinator

LLOG EXPLORATION OFFSHORE, L.L.C.
1001 Ochsner Boulevard, Suite 100 -
Covington, Louisiana 70433

INITIAL PLAN OF EXPLORATION

OCS-G-35295, OCS-G- 36704 & OCS-G-36876 LEASES

EWING BANK BLOCKS 877 & 921

PUBLIC INFORMATION COPY

Prepared By:

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Date: November 14, 2022

LLOG EXPLORATION OFFSHORE, L.L.C.
INITIAL EXPLORATION PLAN
OCS-G-35295, OCS-G- 36704 & OCS-G-36876 LEASES
EWING BANK 877 & 921

APPENDIX A
PLAN CONTENTS
(30 CFR Part 550.211 and 550.241)

A. Plan information

In accordance with 30 CFR 550.211 and 550.241(a), NTL No. 2008-G04 and NTL 2015-N01, LLOG Exploration Offshore, LLC (LLOG) proposes the drilling, completion, testing and installation of subsea wellhead for one (1) proposed surface location E on Lease OCS-G-35295 and passing through Lease OCS-G-36704 with a bottom hole in Lease OCS-G-36876 and proposes one (1) mirrored well (Location Alt E) to be drilled only in the event of a failure. Lease OCS-G-36876 is in the bottom half of EW 921 and is not part of the Ewing Bank 877/921 unit but is, however, operated by LLOG. The operations proposed will not utilize pile-driving, nor is Operator proposing any new pipelines expected to make landfall.

Included as ***Attachment A-1*** is Form BOEM 137 "OCS Plan Information Form", which provides for the drilling, sub-sea completion and testing of all well locations.

B. Location

Attachment A-2 *– Well Location Plat*
Attachment A-3 *– Bathymetry Map – Seafloor disturbance area*

C. Safety & Pollution Features

LLOG will utilize a Drillship or a DP semi-submersible drilling rig for the proposed operations. A description of the drilling units is included on the OCS Plans Information Form. Rig specifications will be made part of the Application for Permit to Drill.

Safety features on the drilling unit will include well control, pollution prevention, and blowout prevention equipment as described in Title 30 CFR Part 250, Subparts C, D, E and G; and further clarified by BOEM's Notices to Lessees, and currently policy making invoked by BOEM, EPA and USCG. Appropriate life rafts, life jackets, ring buoys, etc., will be maintained on the facility at all times.

Pollution prevention measures include installation of curbs, gutters, drip pans, and drains on the drilling deck areas to collect all contaminants and debris**.**

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.):

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of tanks	Total Capacity (bbls)	Fluid Gravity (API)
Fuel Oil Storage Tank	Drillship	16,564	1	16,564	No. 2 Diesel - 43
Fuel Oil Storage Tank		16,685.5	1	16,685.5	No. 2 Diesel - 43
Fuel Oil Settleing Tank		836.6	2	1,673.2	No. 2 Diesel - 43
Fuel Oil Day Tanks		836.6	2	1,673.2	No. 2 Diesel - 43

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of tanks	Total Capacity (bbls)	Fluid Gravity (API)
Fuel Oil (Marine Diesel)	DP Semi-Submersible	164	1	164	30
Fuel Oil Day		367	2	734	30
Emergency Generator		31	1	31	30
Forward Hull Fuel Oil		4634	2	9268	30
Lower Aft Hull Fuel Oil		3462	2	6924	30
Lube Oil Services		117 10.5 4.6	1 1 1	132.1	45
Dirty Lube Oil		38 28	1 1	66	45
Dirty Bilge		190	4	760	10

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 250 and per December 13, 2010 – Guidance for Deepwater Drillers to Comply with Strengthened Safety and Environmental Standards.

OCS Plan Information Form

Attachment A-1
(Proprietary Information)

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

OMB Control Number: 1010-0151
OMB Approval Expires: 12/31/18

OCS PLAN INFORMATION FORM

General Information

Type of OCS Plan:	X	Exploration Plan (EP)	Development Operations Coordination Document (DOCD)	
	X	Initial		

Company Name: LLOG EXPLORATION OFFSHORE L.L.C.	BOEM Operator Number: 02058
Address:	Contact Person: Sue Sachitana
1001 OCHSNER BOULEVARD, Suite 100	Phone Number: 985-801-4300
COVINGTON, LA 70433	E-Mail Address: sue.sachitana@llog.com

If a service fee is required under 30 CFR 550.125(a), provide the	Amount paid	$4,348.00	Receipt No.	272D53OE

Project and Worst Case Discharge (WCD) Information

Lease(s): OCS-G 35295, OCS-G-36704, & OCS-G-36876	Area: EW	Block(s): 7821	Project Name (If Applicable): Spruance

Objective(s)	X	Oil		Gas		Sulphur		Salt	Onshore Support Base(s): FOURCHON

Platform/Well Name: A (001)	Total Volume of WCD: 222,538 BOPD	API Gravity: 27.5°
Distance to Closest Land (Miles): 67	Volume from uncontrolled blowout: 5.71 MMBO	

Have you previously provided information to verify the calculations and assumptions for your WCD?	X	Yes		No
If so, provide the Control Number of the EP or DOCD with which this information was provided	N-09935			
Do you propose to use new or unusual technology to conduct your activities?		Yes	X	No
Do you propose to use a vessel with anchors to install or modify a structure?		Yes	X	No
Do you propose any facility that will serve as a host facility for deepwater subsea development?		Yes	X	No

Description of Proposed Activities and Tentative Schedule (Mark all that apply)

Proposed Activity	Start Date	End Date	No. of Days
Exploration drilling			
Development drilling			
Well completion	See Attached Activity Schedule		
Well test flaring (for more than 48 hours)			
Installation or modification of structure			
Installation of production facilities			
Installation of subsea wellheads and/or manifolds			
Installation of lease term pipelines			
Commence production			
Other (Specify and attach description)			

Description of Drilling Rig

	Jackup	X	Drillship		Caisson		Tension leg platform
	Gorilla Jackup		Platform rig		Fixed platform		Compliant tower
	Semisubmersible		Submersible		Spar		Guyed tower
X	DP Semisubmersible		Other (Attach Description)		Floating production system		Other (Attach Description)

Drilling Rig Name (If Known):

Description of Lease Term Pipelines

From (Facility/Area/Block)	To (Facility/Area/Block)	Diameter (Inches)	Length (Feet)

Proposed Schedule of Activities

WELL / EVENT	SPUD	TD	COMPL START	COMPL FINISH	DESCRIPTION
Location E	1-Jan-24	30-May-24	1-Jan-25	31-May-25	Drill / Complete

Year	Number of Days
2024	150
2025	150

OCS PLAN INFORMATION FORM (CONTINUED)
Include one copy of this page for each proposed well/structure

Proposed Well/Structure Location

Well or Structure Name/Number (If renaming well or structure, reference previous name): Loc E			Previously reviewed under an approved EP or DOCD?		Yes		No
Is this an existing well or structure?		Yes		No X	If this is an existing well or structure, list the Complex ID or API No.		
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?			x	Yes		No	

WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 222,538	For structures, volume of all storage and pipelines (Bbls):	API Gravity of fluid	27.5°

	Surface Location	**Bottom-Hole Location (For Wells)**	**Completion (For multiple completions, enter separate lines)**
Lease No.	OCS G 35295	OCS	OCS OCS
Area Name	Ewing Bank		
Block No.	877		
Blockline Departures (in feet)	N/S Departure: F S L 284.00'	N/S Departure: F____ L	N/S Departure: F____ L N/S Departure: F____ L N/S Departure: F____ L
	E/W Departure: F E L 147.80'	E/W Departure: F____ L	E/W Departure: F____ L E/W Departure: F____ L E/W Departure: F____ L
Lambert X-Y coordinates	X: 2,613,452.20	X:	X: X: X:
	Y: 10,201,244.00	Y:	Y: Y: Y:
Latitude/ Longitude	Latitude 28° 04' 40.676" N	Latitude	Latitude Latitude Latitude
	Longitude 89° 58' 56.090" W	Longitude	Longitude Longitude Longitude

Water Depth (Feet): 1,570'	MD (Feet):	TVD (Feet):	MD (Feet): MD (Feet): MD (Feet):	TVD (Feet): TVD (Feet): TVD (Feet):
Anchor Radius (if applicable) in feet:				

Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)

Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	

OCS PLAN INFORMATION FORM (CONTINUED)
Include one copy of this page for each proposed well/structure

Proposed Well/Structure Location

Well or Structure Name/Number (If renaming well or structure, reference previous name): Loc Alt E					Previously reviewed under an approved EP or DOCD?		Yes	X	No
Is this an existing well or structure?		Yes		No X	If this is an existing well or structure, list the Complex ID or API No.				
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						X	Yes		No

WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 222,538	For structures, volume of all storage and pipelines (Bbls):	API Gravity of fluid	27.5°

	Surface Location	**Bottom-Hole Location (For Wells)**	**Completion (For multiple completions, enter separate lines)**
Lease No.	OCS G 35295	OCS	OCS OCS
Area Name	Ewing Bank		
Block No.	877		
Blockline Departures (in feet)	N/S Departure: F S 284.00' L	N/S Departure: F____ L	N/S Departure: F____ L N/S Departure: F____ L N/S Departure: F____ L
	E/W Departure: F E 97.80' L	E/W Departure: F____ L	E/W Departure: F____ L E/W Departure: F____ L E/W Departure: F____ L
Lambert X-Y coordinates	X: 2,613,502.20	X:	X: X: X:
	Y: 10,201,244.00	Y:	Y: Y: Y:
Latitude/ Longitude	Latitude 28° 04' 40.663" N	Latitude	Latitude Latitude Latitude
	Longitude 89° 58' 55.532" W	Longitude	Longitude Longitude Longitude

Water Depth (Feet): 1,570'	MD (Feet):	TVD (Feet):	MD (Feet): MD (Feet): MD (Feet):	TVD (Feet): TVD (Feet): TVD (Feet):
Anchor Radius (if applicable) in feet:				

Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)

Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	
			X =	Y =	

Well Location Plats

Attachment A-2
(Proprietary Information)

EW877
OCS-G35295
LLOG EXPLORATION OFFSHORE LLC

X = 2,597,760.00

X = 2,613,600.00

NORTH GRID

PROPOSED WELL LOCATIONS

LOCATION	BLOCK	CALLS		COORDINATES		LATITUDE	LONGITUDE	WD	MD	TVD
'E' (SL)	*EW/877*	*147.80' FEL*	*284.00' FSL*	*X = 2,613,452.20*	*Y = 10,201,244.00*	*28° 04' 40.676"N*	*89° 58' 56.090"W*	*1,570'*		
'ALT E' (SL)	*EW/877*	*97.80' FEL*	*284.00' FSL*	*X = 2,613,502.20*	*Y = 10,201,244.00*	*28° 04' 40.663"N*	*89° 58' 55.532"W*	*1,570'*		

SS001 (G35295)
'E' & 'ATL E' (SL)
SS001 (G36704)

Y = 10,200,960.00

EW921
OCS-G36704
LLOG EXPLORATION OFFSHORE LLC

OCS-G36876
LLOG EXPLORATION OFFSHORE LLC

004 (G12142)

PUBLIC INFORMATION

LLOG EXPLORATION OFFSHORE, L.L.C.

Echo OFFSHORE LLC
36499 Perkins Road
Prairieville, Louisiana 70769
Tel: 225-673-2163

LLOG exploration

1,000 0 1,000 2,000
SCALE IN FEET

DATUM: NAD 27 | SPHEROID: CLARKE 1866 | PROJECTION: U.T.M. | ZONE: 15

EXPLORATION PLAT

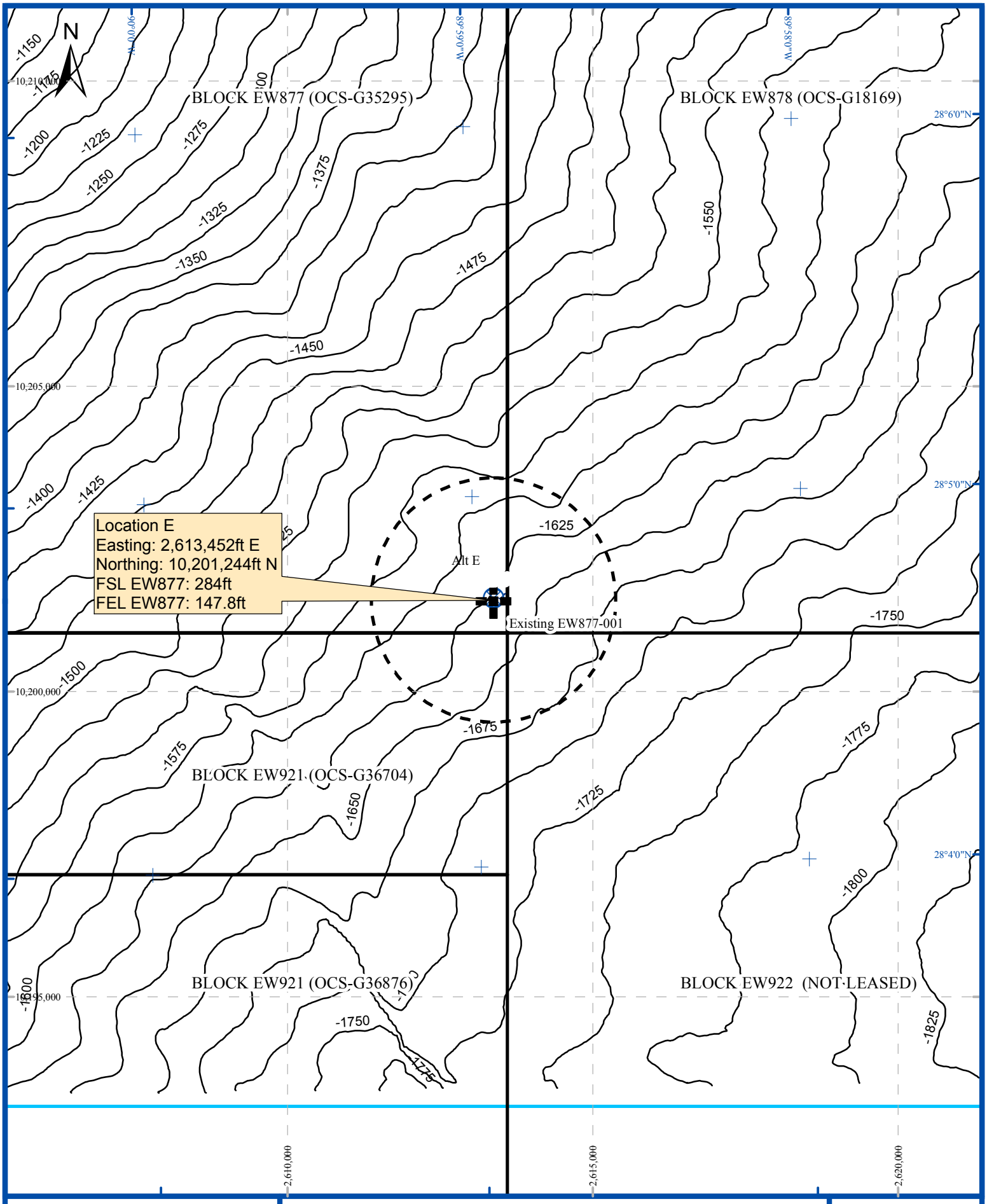
PROPOSED WELL 'E' & 'ALT E'
OCS-G 36876 BLOCK 921 WITH SURFACE BLOCK 877
EWING BANK AREA

GULF OF MEXICO

DRAWN BY: RJN	CHK. BY.: MEK	REV. No.:	JOB No.: 22-058	DWG No.: 22-058-EXP_EW921
DATE: 10/24/2022	REV. DATE:		SCALE: 1"=2,000'	SHEET 1 OF 1

Bathymetry Map

Attachment A-3
(Public Information)



Bathymetry Plat

Figure 10

APPENDIX B
GENERAL INFORMATION
(30 CFR Part 550.213 and 550.243)

A. Applications and Permits

There are no Federal/State applications to be submitted for the activities provided for in this Plan (exclusive to BOEM permit applications and general permits issued by the EPA and COE)

Application/Permit	Issuing Agency	Status
LA Consistency	LA Coastal Zone Management	To be filed
APD	BSEE	To be filed

B. Drilling Fluids

Type of Drilling Fluid	Estimated Volume of Drilling Fluid to be used per Well
Water Based (seawater, freshwater, barite)	**See Appendix F, Table 1 of this Plan**
Oil–based (diesel, mineral oil)	**N/A**
Synthetic-based (internal olefin, ester)	**See Appendix F, Table 2 of this Plan**

C. New Or Unusual Technology

LLOG does not propose using any new and/or unusual technology for the operations proposed in this Initial Plan.

D. Bonding Statement

The bond requirements for the activities and facilities proposed in this Initial Exploration Plan are satisfied by an area wide bond, furnished, and maintained according to 30 CFR Part 256; subpart I; NTL No. 2000-G16, "Guidelines for General Lease Surety Bonds," and additional security under 30 CFR 256.53(d) and NTL No. 2003-N06 "Supplemental Bond Procedures."

E. Oil Spill Responsibility (OSFR)

LLOG Exploration Offshore, L.L.C (MMS Co. No. 02058) will demonstrate oil spill financial responsibility for the facilities proposed in this Initial EP according to 30 CFR Part 553, and NTL No. 2008-N05 "Guidelines for Oil Spill Financial Responsibility (OSFR) for Covered Facilities."

F. Deepwater Well Control Statement

LLOG Exploration Offshore, L.L.C. (MMS Co. No. 02058) has the financial capability to drill a relief well and conduct other emergency well control operations.

G. Blowout Scenario

The Worst-Case Discharge (WCD) Calculations for the proposed well is included as part of plan N-9935 and is not required as part of this plan. The Blowout Scenario, including Site Specific Proposed Relief Well and Intervention Planning and Relief Well Response Time Estimate (Public Information) - Attachment B-1.

NTL 2015-N01 Data

Blowout Scenario

Attachment B-1
(Public Information)

BLOWOUT SCENARIO

Pursuant with 30 CFR 250.213(g), 250.219, 250,250 and NTL 2015-N01 the following attachment provides a blowout scenario description, information regarding any oil spill, WCD results and assumptions of potential spill and additional measures taken to firstly enhance the ability to prevent a blowout and secondly to manage a blowout scenario if it occurred.

INFORMATION REQUIREMENTS

A) Blowout scenario

The well(s) to be drilled to potential outlined in the Geological and Geophysical Information Section of this plan utilizing a typical subsea wellhead system, conductor, surface, and intermediate casing strings and a MODU rig with marine riser and a subsea BOP system. A hydrocarbon influx and a well control event occurring from the objective sand is modeled with no drill pipe or obstructions in the wellbore followed by a failure of the subsea BOP's and loss of well control at the seabed. The simulated flow and worst case discharge (WCD) results for all wells are calculated and the highest WCD is used for this unrestricted blowout scenario.

B) Estimated flow rate of the potential blowout

Category	Initial EP
Type of Activity	Drilling
Facility Location (area / block)	EW 877 (surface location)
Facility Designation	MODU
Distance to Nearest Shoreline (statute miles)	~67 statute miles
Uncontrolled Blowout (Volume per day)	**222,538** bbls (max estimated)
Type of Fluid	Crude

C) Total volume and maximum duration of the potential blowout

Duration of Flow (days)	**80** days total (see Relief Well Response Estimate below)
Total Volume of Spill (bbls)	**~5.71** MMBO based on **80** days of uncontrolled flow based on simulator models (WCD Simulation)

D) Assumptions and calculations used in determining the worst case discharge

Submitted as Attachment B-1 in the Proprietary Copy of this Plan - Omitted from Public Information Copies

E) Potential for the well to bridge over

Mechanical failure/collapse of the borehole in a blowout scenario is influenced by several factors including in-situ stress, rock strength and fluid velocities at the sand face. Given the substantial fluid velocities inherent in the WCD, and the scenario as defined where the formation is not supported by a cased and cemented wellbore, it is possible that the borehole may fall/collapse/bridge over within a span of a few days, significantly reducing the outflow of the rates. For this blowout scenario, no bridging is considered.

F) Likelihood for intervention to stop blowout

The likelihood of surface intervention to stop a blowout is based on some of the following equipment specific to potential MODU's to be contracted for this well. It is reasonable to assume that the sooner you are able to respond to the initial blowout, the better likelihood there is to control and contain the event due to reduced pressures at the wellhead, less exposure of well fluids to erode and compromise the well control equipment, and less exposure of hydrocarbons to the surface to safeguard personnel and equipment in an emergency situation. This equipment includes:

- Secondary Acoustic BOP Control System – typically fitted on DP MODU's presently operating in the GOM. This system has the ability to communicate and function specific BOP controls from the surface in the event of a failure of the primary umbilical control system. This system typically can establish BOP controls from the surface acoustic system package on the rig or by deploying a second acoustic package from a separate vessel of opportunity. This system may not be included on all MODU's such as 4th generation moored rigs. This system is typically configured to function the following:

    - Blind/shear ram close
    - Pipe ram close
    - LMRP disconnect

- ROV Intervention BOP Control System – includes one or more ROV intervention panels mounted on the subsea BOP's located on the seabed allows a ROV utilizing standard ROV stabs to access and function the specific BOP controls. These functions will be tested at the surface as part of the required BOP stump test and selectively at the seafloor to ensure proper functionality. These function include the following (at a minimum):

    - Blind/shear ram close
    - Pipe ram close
    - LMRP disconnect
    - WH disconnect

- Deadman / Autoshear function – typically fitted on DP MODU's and but to be on all MODU's operating in the GOM according to new requirements, this equipment allows for an automated pre-programmed sequence of functions to close the casing shear rams and the blind/shear rams in the event of an inadvertent or emergency disconnect of the LMRP or loss of both hydraulic and electrical supply from the surface control system.

In the event that the intervention systems for the subsea BOP's fail, LLOG will initiate call out of a secondary containment / surface intervention system supported by the Helix Well Containment Group (HWCG) of which LLOG is a member. This system incorporates a capping stack capable of being deployed from the back of a vessel of opportunity equipped with an ROV or from the Helix Q4000 DP MODU. Based on the potential integrity concerns of the well, a "cap and flow" system can be deployed which may include the Helix Producer 1 capable of handling up to 55,000 BOPD flowback. The vertical intervention work is contingent upon the condition of the blowing out well and what equipment is intact to access the wellbore for kill or containment operations. The available intervention equipment may also require modifications based on actual wellbore conditions. Standard equipment is available through the Helix Deepwater Containment System to fit the wellhead and BOP stack profiles used for the drilling of the above mentioned well.

G) Availability of rig to drill relief well, rig constraints and timing of rigs

LLOG currently has three deepwater MODU's under contract (Noble Amos Runner moored semi, Sevan Louisiana DP semi, and Seadrill West Neptune DP drillship). In the event of a blowout scenario that does not involve loss or damage to the rig such as an inadvertent disconnect of the BOP's, then the existing contracted rig may be available for drilling the relief well and vertical intervention work. If the blowout scenario involves damage to the rig or loss of the BOP's and riser, a replacement rig or rigs will be required.

With the current activity level in the GOM, 30 to 35 deepwater MODU'S are potentially available to support the relief well drilling operations. Rig share and resource sharing agreements are in place between members of the Helix Well Containment Group. The ability to negotiate and contract an appropriate rig or rigs to drill relief wells is highly probable in a short period of time. If the rig or rigs are operating, the time to properly secure the well and mobe the rig to the relief well site location is estimated to be about 14 to 21 days. Dynamically positioned (DP) MODU's would be the preferred option due to the logistical advantage versus a moored MODU which may add complications due to the mooring spread.

VESSELS OF OPPORTUNITY

Based on the water depth restrictions for the proposed locations the following "Vessels of Opportunity" are presently available for utilization for intervention and containment and relief well operations. These may include service vessels and drilling rigs capable of working in the potential water depths and may include moored vessels and dynamically positioned vessels. The specific conditions of the intervention or relief well operations will dictate the "best fit" vessel to efficiently perform the desired results based on the blowout scenario. The list included below illustrates specific option that may vary according to the actual timing / availability at the time the vessels are needed.

OPERATION	SPECIFIC VESSEL OF OPPORTUNITY
Intervention and Containment	• Helix Q4000 (DP Semi) • Helix Producer 1 (DP FPU)
Relief Well Drilling Rigs	• Seadrill West Neptune (DP Drillship) • Noble Faye Kozack (DP Drillship) • Ensco DS-4 (DP Drillship)
ROV / Multi-Purpose Service Vessels	• Oceaneering (numerous DP ROV vessels) • HOS Achiever, Iron Horse 1 and 2 (DP MPSV) • Helix Pipe Lay Vessel (equipped w/ 6" PL – 75,000') • Other ROV Vessels – (Chouest, HOS, Fugro, Subsea 7)
Shuttle Tanker / Barge Support	• OSG Ship Management

H) Measures taken to enhance ability to prevent blowout

Pursuant to BOEM-2010-034 Final Interim Rules, measures to enhance the ability to prevent or reduce the likelihood of a blowout are largely based on proper planning and communication, identification of potential hazards, training and experience of personnel, use of good oil field practices and proper equipment that is properly maintained and inspected for executing drilling operations of the proposed well or wells to be drilled.

When planning and designing the well, ample time is spent analyzing offset data, performing any needed earth modeling and identifying any potential drilling hazards or well specific conditions to

safeguard the safety of the crews when well construction operations are underway. Once the design criteria and well design is established, the well design is modeled for the lifecycle of the wellbore to ensure potential failure modes are eliminated. Pursuant to BOEM-2010-0034 Interim Final Rules implemented additional considerations of a minimum of 2 independent barriers for both internal and external flow paths in addition to proper positive and negative testing of the barriers.

The proper training of crew members and awareness to identify and handle well control event is the best way prevent a blowout incident. Contractor's personnel and service personnel training requirements are verified per regulatory requirements per guidelines issued in BOEM-2010-034 Interim Final Rules. Drills are performed frequently to verify crew training and improve reaction times.

Good communication between rig personnel, office support personnel is critical to the success of the operations. Pre-spud meetings are conducted with rig crews and service providers to discuss, inform and as needed improve operations and well plans for safety and efficiency considerations. Daily meetings are conducted to discuss planning and potential hazards to ensure state of preparedness and behavior is enforced to create an informed and safe culture for the operations. Any changes in the planning and initial wellbore design is incorporated and communicated in a Management of Change (MOC) process to ensure continuity for all personnel.

Use of established good oil field practices that safeguard crews and equipment are integrated to incorporate LLOG's, the contractor and service provider policies.

Additional personnel and equipment will be used as needed to elevate awareness and provide real time monitoring of well conditions while drilling such as MWD/LWD/PWD tools used in the bottom hole assemblies. The tool configuration for each open hole section varies to optimize information gathered including the use of Formation-Pressure-While-Drilling (FPWD) tools to establish real time formation pressures and to be used to calibrates pore pressure models while drilling. Log information and pressure data is used by the drilling engineers, geologist and pore pressure engineers to maintain well control and reduced potential events such as well control events and loss circulation events.

Mud loggers continuously monitor return drilling fluids, drill gas levels and cuttings as well as surface mud volumes and flow rates, rate of penetration and lithology/paleo to aid in understanding trends and geology being drilled. Remote monitoring of real time drilling parameters and evaluation of geologic markers and pore pressure indicators is used to identify potential well condition changes.

Proper equipment maintenance and inspection program for same to before the equipment is required. Programmed equipment inspections and maintenance will be performed to ensure the equipment operability and condition. Operations will cease as needed in order to ensure equipment and well conditions are maintained and controlled for the safety of personnel, rig and subsurface equipment and the environment.

I) Measures to conduct effective and early intervention in the event of a blowout

In conjunction with the LLOG Exploration's "Well Control Emergency Response Plan" and as required by NTL 2010-N06, the following is provided to demonstrate the potential time needed for performing secondary intervention and drilling of a relief well to handle potential worst case discharge for the proposed prospect. Specific plans are integrated into the Helix Well Containment Groups procures to be approved and submitted with the Application for Permit to Drill. Equipment availability, backup equipment and adaptability to the potential scenarios will need to be addressed based on the initial site assessment of the seafloor conditions for intervention operations. Relief well equipment such as

backup wellhead equipment and tubulars will be available in LLOG's inventory for immediate deployment as needed to address drilling the relief well(s).

SITE SPECIFIC PROPOSED RELIEF WELL AND INTERVENTION PLANNING

No platform was considered for drilling relief wells for this location due to location, water depth and lack of appropriate platform within the area. For this reason, a moored or DP MODU will be preferred / required.

The surface location for a relief well(s) is a function of seabed bottom and shallow hazard conditions, current, wind direction and wellbore access. The relief well surface location could be drilled from an appropriately cleared-of-hazards surface location included in the EP package.

RELIEF WELL RESPONSE TIME ESTIMATE

OPERATION	TIME ESTIMATE (DAYS)
IMMEDIATE RESPONSE • safeguard personnel, render first-aid • make initial notifications • implement short term intervention (if possible) • implement spill control • develop Initial Action Plan	1
INTERIM REPSONSE • establish Onsite Command Center and Emergency Management Team • assess well control issues • mobilize people and equipment (Helix DW Containment System) • implement short term intervention and containment (if possible) • develop Intervention Plan • initiate relief well planning • continue spill control measures	4
INTERVENTION AND CONTAIMENT OPERATIONS • mobilize equipment and initiate intervention and containment operations • perform TA operations and mobilize relief wells rig(s) • finalize relief well plans, mobilize spud equipment, receive approvals • continue spill control measures	14
RELIEF WELL(S) OPERATIONS • continue intervention and containment measures • continue spill control measures • drill relief well (s)	41
PERFORM HYDRAULIC KILL OPERATIONS / SECURE BLOWNOUT WELL • continue intervention and containment measures • continue spill control measures • perform hydraulic kill operations, monitor well, secure well	20
ESTIMATED TOTAL DAYS OF UNCONTROLLED FLOW	**80**
SECURE RELIELF WELL(S) / PERFORM P&A / TA OPERATIONS / DEMOBE	30
TOTAL DAYS	**110**

APPENDIX C
GEOLOGICAL AND GEOPHYSICAL INFORMATION
(30 CFR Part 550.214 and 550.244)

A. Geological Description

Included as ***Attachment C-1*** are the geological targets and a narrative of trapping features proposed in this Plan.

B. Structure Contour Maps

Included as ***Attachment C-2*** are current structure maps (depth base and expressed in feet subsea) depicting the entire lease coverage area; drawn on top of the prospective hydrocarbon sands. The maps depict each proposed bottom hole location and applicable geological cross section.

C. Interpreted Seismic Lines

Included as ***Attachment C-3*** is a copy of the migrated and annotated (shot points, timelines, well paths) deep seismic line within 500 feet of the surface location being proposed in this Plan.

D. Geological Structure Cross-Sections

An interpreted geological cross section depicting the proposed well locations and depth of the proposed wells is included as ***Attachment C-4***. Such cross section corresponds to each seismic line being submitted.

E. Shallow Hazards Report

3-D Geohazard Survey, Ewing Bank Area Block 877 (Lease No. OCS-G 35295) Gulf of Mexico was prepared by Gardline and was submitted to BOEM by letter dated February 11, 2016.

A Deep Tow Survey, Ewing Bank Area Block 877 (Lease No. OCS-G 35295), Gulf of Mexico was prepared by Tesla Offshore, LLC, for LLOG Exploration Offshore, LLC, dated April, 2015, submitted to BOEM under letter dated January 27, 2016.

An Archaeological Assessment for Ewing Bank Block 877, OCS-G-35295 Lease was prepared by Tesla Offshore, LLC & C&C Technologies Survey Services, for LLOG in January, 2016, submitted to BOEM under separate cover.

F. Shallow Hazards Assessment

Utilizing the 3D deep seismic exploration data a shallow hazards analysis was prepared for the proposed surface locations, evaluating seafloor and subsurface geologic and manmade features and conditions, and was submitted as part of the initial exploration plan N-9935 and again as part of supplemental exploration plan S-8017. The E location is proposed within 500' of those previously approved well sites therefore a new clearance letter is not required.

G. High Resolution Seismic Lines

LLOG did not run 3-D seismic for this prospect.

H. Stratigraphic Column

A generalized biostratigraphic/lithostratigraphic column from the seafloor to the total depth of the proposed wells is included as ***Attachment C-5.***

I. Time vs Depth Tables

LLOG has determined that there is existing sufficient well control data for the target areas proposed in this Plan; therefore, tables providing seismic time versus depth for the proposed well locations are not required.

Geological Description

Attachment C-1
(Proprietary Information)

Structure Maps

Attachment C-2
(Proprietary Information)

Deep Seismic Lines

Attachment C-3
(Proprietary Information)

Cross Section Maps

Attachment C-4
(Proprietary Information)

Stratigraphic Column

Attachment C-5
(Proprietary Information)

APPENDIX D
HYDROGEN SULFIDE (H_2S) INFORMATION
(30 CFR Part 550.215 and 550.245)

A. Concentration

LLOG does not anticipate encountering H_2S while conducting the proposed exploratory operations provided for under this plan.

B. Classification

The Ewing Banks 877 / 921 area has been determined to be "H_2S Absent" as determined in approval letter for supplemental exploration plan, S-7988, dated February 26, 2020.

C. H_2S Contingency Plan

Not applicable for the proposed operations.

D. Modeling Report

Not applicable to the proposed operations.

APPENDIX E
BIOLOGICAL, PHYSICAL AND SOCIOECONOMIC INFORMATION
(30 CFR Part 550.216 and 550.247)

A. High-Density Deepwater Benthic Communities Information

Potential Sensitive Sessile Benthic Communities for Locations E and E Alt: Features or areas that could support high density sensitive sessile benthic communities are ***not*** located within 2,000' of any proposed mud and cuttings discharge location.

B. Topographic Features Map

The activities proposed in this Plan are not affected by a topographic feature.

C. Topographic Features Statement (Shunting)

The activities proposed in this Plan are not affected by a topographic feature; therefore, LLOG is not required to shunt drill cuttings and drill fluids.

D. Live Bottoms (Pinnacle Trend) Map

Ewing Bank Block 877 is not located within the vicinity of a proposed live bottom (Pinnacle trend) area.

E. Live Bottoms (Low Relief) Map

Ewing Bank Block 877 is not located within the vicinity of a proposed live bottom (Low Relief) area.

F. Potentially Sensitive Biological Features Map

Ewing Bank Block 877 is not located within the vicinity of a proposed sensitive biological feature area.

G. Threatened or Endangered Species, Critical Habitat, and Marine Mammal Information.

Proposed activities in **Ewing Bank Blocks 877** is not located in a critical habitat designated under ESA and marine mammals protected under the MMPA although federally protected marine mammals are always anticipated. LLOG will mitigate impact through compliance with BOEM NTL 2016-G01, G02 and NTL 2015 BSEE-G03. See ***Attachment E-1*** for a list of the NOAA Species known in the Gulf of Mexico. In the event federally listed species become present on Ewing Bank Block 877, LLOG will mitigate impact through compliance with BOEM NTL 2016-G01, G02, NTL 2015 BSEE-G03 and the Biological Opinion of the Endangered Species Act Section 7. See Attachment E-1 for a list of the NOAA Species known in the Gulf of Mexico. Moon pool daily observation log shall be maintained on the bridge. The deck supervisor on tour shall go to the bridge and log time, date, and results of each moon pool inspection. STOP WORK AUTHORITY shall be used and implemented, in a safe and timely manner, for any work that could affect marine life listed on the Endangered Species Act.

H. Archaeological Information

A Deep Tow Survey, Ewing Bank Area Block 877 (Lease No. OCS-G 35295), Gulf of Mexico was prepared by Tesla Offshore, LLC, for LLOG Exploration Offshore, LLC, dated April, 2015, submitted to BOEM under letter dated January 27, 2016.

I. Air and Water Quality Information

Not applicable to proposed operations.

J. Socioeconomic Information

Not applicable to proposed operations.

NOAA Species Known in GOM

Attachment E-1
(Public Information)

APPENDIX F
WASTE AND DISCHARGE INFORMATION
(30 CFR PART 550.217 AND 550.248)

A. Projected Generated Wastes

See the following tables:

TABLE 1. Wastes you will generate, treat and downhole dispose or discharge to the GOM

TABLE 2. Wastes you will transport and /or dispose of onshore

B. Modeling

Not applicable. Proposed activities will be covered by U.S. EPA NPDES General Permit.

TABLE 1. WASTES YOU WILL GENERATE, TREAT AND DOWNHOLE DISPOSE OR DISCHARGE TO THE GOM

please specify if the amount reported is a total or per well amount

Projected generated waste			Projected ocean discharges		Downhole Disposal
Type of Waste	**Composition**	**Projected Amount**	**Discharge rate**	**Discharge Method**	**Answer yes or no**
Will drilling occur ? If yes, fill in the muds and cuttings.					
EXAMPLE: Cuttings wetted with synthetic based fluid	*Cuttings generated while using synthetic based drilling fluid.*	*X bbl/well*	*X bbl/day/well*	*discharge overboard*	*No*
Water-based drilling fluid	Water based mud additives, barite and gel used for WBM	101,724 bbls/well	9,042 bbls/day/well	Discharge overboard	No
Cuttings wetted with water-based fluid	Cuttings generated while using water based drilling fluid.	5,486 bbls/well	488 bbls/day/well	Discharge overboard	No
Cuttings wetted with synthetic-based fluid	Cuttings generated while using synthetic based drilling fluid.	5,420 bbls/well	146 bbls/day/well	Discharge overboard	No
Will humans be there? If yes, expect conventional waste					
EXAMPLE: Sanitary waste water	Sanitary waste from living quarters	X bbl/well	X bbl/hr/well	chlorinate and discharge overboard	No
Domestic waste	Misc waste for living quarters	8,900 bbls/well	3.1 bbls/hr/well	Discharge overboard (no free oil)	No
Sanitary waste	Processed sanitary waste from living quarters	5,933 bbls/well	2.1 bbls/hr/well	Chlorinate and discharge overboard	No
Is there a deck? If yes, there will be Deck Drainage					
Deck Drainage	Accumulated drainage due to rainfall	0 to 47,261 bbls/well	0 to 167 bbls/hr/well	Test for oil and grease and discharge overboard	No
Will you conduct well treatment, completion, or workover?					
Well treatment fluids	KCL frac fluid containing: 330.7 bbls fresh water, KCL salt, 0.024 bbls Tetrakis (hydroxymethyl) phosphonium sulfate (biocide), 0.143 bbls cationic polymer (non-emulsifier), 0.071 bbls ethoxylated nonionic surfactant (surface tension reducer), 0.069 bbls ammonium persulphate (breaker), 0.167 bbls potassium carbonate (buffer), 0.190 bbls borate (crosslinking agent), 0.071 bbls quaternary ammonium compound (clay stabilization), 0.143 bbls hemicellulase enzyme (breaker), 0.81 bbls non-hazardous components (fines control)	333 bbls/well	20 bbls/hr/well	Test for oil and grease and discharge overboard.	No
Well completion fluids	Non-pollutant clear brines used for completion operations (NaCl, KCl, CaBr2, CaCl2)	500 bbls/well	100 bbls/hr/well	Test for oil and grease and discharge overboard	No
Workover fluids	NA	NA	NA	NA	NA
Miscellaneous discharges. If yes, only fill in those associated with your activity.					
Desalinization unit discharge	Uncontaminated spent seawater used for potable water generation unit	0 to 100,000 bbls/well	60 bbls/hr/well	Discharge overboard	No
Blowout prevent fluid	Treated freshwater used control of subsea blowout preventers	0 to 100 bbls/well	5 bbls/hr/well	Discharge at seafloor	No
Ballast water	Uncontaminated seawater used for ballast control	0 to 100,000 bbls/well	16,350 bbls/hr/well	Discharge overboard	No
Bilge water	NA	NA	NA	NA	No
Excess cement at seafloor	Excess cement slurry and mixwater used for cementing operation - NPDES allowed	300 bbls/well	360 bbls/hr/well	Discharge at mudline	No
Fire water	Uncontaminated seawater used for fire control system	0 to 10,000 bbls/well	16,350 bbls/hr/well	Discharge overboard	No
Cooling water	Uncontaminated seawater used for heat exchanger operations used to cool machinery	0 to 400,000 bbls/well	120 bbls/hr/well	Discharge overboard	No
Will you produce hydrocarbons? If yes fill in for produced water.					
Produced water	NA	NA	NA	NA	No
Will you be covered by an individual or general NPDES permit ?		**General NPDES**	GMG290180		
			Comply with the requirements of the NPDES permit.		

NOTE: If you will not have a type of waste, enter NA in the row.

TABLE 2. WASTES YOU WILL TRANSPORT AND /OR DISPOSE OF ONSHORE

Please specify whatever the amount reported is a total or per well

	Projected generated waste	Solid and Liquid Wastses Transportation	Waste Disposal		
Type of Waste	**Composition**	**Transport Method**	**Name/Location of Facility**	**Amount**	**Disposal Method**
			Newport Environmental Services Inc., Ingleside, TX	*X bbl/well*	*Recycled*
Oil-based drilling fluid or mud	NA	NA	NA	NA	NA
Synthetic-based drilling fluid or mud	Internal olifin, ester nbased mud	Barged in 25 bbls cutting boxes and / or liquid mud tanks for supply vessels	Newpark Transfer Station, Fourchon, LA	6750 bbls / well	Recycled
Cuttings wetted with Water-based fluid	NA	NA	Newpark Transfer Station, Fourchon, LA	NA	NA
Cuttings wetted with Synthetic-based fluid	NA	NA	Newpark Transfer Station, Fourchon, LA	NA	NA
Cuttings wetted with oil-based fluids	NA	NA	Newpark Transfer Station, Fourchon, LA	NA	NA
Will you produce hydrocarbons? If yes fill in for produced sand.					
Produced sand	NA	NA	NA	NA	NA
Will you have additional wastes that are not permitted for discharge? If					
EXAMPLE: trash and debris (recylables)	*Plastic, paper, aluminum*	*barged in a storage bin*	*ARC, New Iberia, LA*	*X lb/well*	*Recycled*
Trash and debris	Plastic, paper, aluminum	Barged in a storage bin	Blanchard Landfill, Golden Meadows, LA	4000 lbs / well	Recycled
Used oil	Spent oil from machinery	Barged in USCG approved transfer tote tanks.	L&L Services, Fourchon, LA	200 bbls / well	Recycled
Wash water	Wash water w/ SBM residue and surfactants	Barged in 25 bbls cutting boxes and / or liquid mud tanks for supply vessels	Newpark Transfer Station, Fourchon, LA	2000 bbls / well	Approved disposal well injection or land farm
Chemical product wastes	Spent treatment and / or damaged chemicals used in operations	Barged in 25 bbls cutting boxes and / or cutting boxes	L&L Services, Fourchon, LA	10 bbls / well	Recycled
Completion fluids	Brine, brines containing Zinc, spent acid (hydrofluoric & hydrochloric), prop sand, debris	Barged in 25 bbls cutting boxes and / or cutting boxes	Newpark Transfer Station, Fourchon, LA	500 bbls / well	Approved disposal well injection or land farm
Chemical product wastes (well treatment fluids)	Ethylene glycol, methanol	Barged in 25 bbls cutting boxes and / or cutting boxes	Newpark Transfer Station, Fourchon, LA	500 bbls / well	Approved disposal well injection or land farm

NOTE: If you will not have a type of waste, enter NA in the row.

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

A. Emissions Worksheets and Screening Questions

The Projected Quality Emissions Report (Form MMS-138) addresses the proposed drilling, completion and potential testing operations utilizing a typical drillship, with related support vessels and construction barge information.

As evidenced by ***Attachment G-1,*** the worksheets were completed based on the proposed flaring and burning operations.

Screening Questions for EP's	***Yes***	***No***
Is any calculated Complete Total (CT) Emission amount (in tons associated with your proposed exploration activities more than 90% of the amounts calculated using the following formulas: CT = 3400D (2/3) for CO, and CT = 33.3D for the other air pollutants (where D = distance to shore in miles)?		X
Does your emission calculations include any emission reduction measures or modified emission factors?		X
Are your proposed exploration activities located east of 87.5 degrees W longitude?		X
Do you expect to encounter H^2S at concentrations greater than 20 parts per million (ppm)?		X
Do you propose to flare or vent natural gas for more than 48 continuous hours from any proposed well?		X
Do you propose to burn produced hydrocarbon liquids?		X

B. Emissions Reduction Measures

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

C. Verification of Nondefault Emissions Factors

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

D. Non-Exempt Activities

The proposed activities are within the exemption amount as provided in ***Attachment G-1.***

E. Modeling Report

This section of the Plan is not applicable to the proposed operations.

Air Quality Emissions Report

Attachment G-1
(Public Information)

OMB Control No. 1010-0151
OMB Approval Expires: 08/31/2023

COMPANY	LLOG Exploration Offshore, LLC
AREA	Ewing Bank
BLOCK	877 / 921
LEASE	OCS-G-35295, OCS-G-36704 & OCS-G-36876
FACILITY	
WELL	Location E & Alt E
COMPANY CONTACT	Susan Sachitana
TELEPHONE NO.	985-801-4300
REMARKS	Drill Ship - Drilling & Completion Operations

AIR EMISSIONS COMPUTATION FACTORS

Fuel Usage Conversion Factors	Natural Gas Turbines				Natural Gas Engines		Diesel Recip. Engine		Diesel Turbines			
	SCF/hp-hr				SCF/hp-hr	7.143	GAL/hp-hr	0.0514	GAL/hp-hr	0.0514		

Equipment/Emission Factors	units		PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	REF.	DATE	Reference Links
Natural Gas Turbine	g/hp-hr		0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	N/A	AP42 3.1-1& 3.1-2a	4/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf
RECIP. 2 Cycle Lean Natural Gas	g/hp-hr		0.1293	0.1293	0.0020	6.5998	0.4082	N/A	1.2009	N/A	AP42 3.2-1	7/00	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	0.4014	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://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s03.pdf 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	0.0013	4.45E-05	0.0105	0.0000	AP42 3.1-1& 3.1-2a; AP42 3.1-1 & 3.1-2a	4/00	https://cfpub.epa.gov/webfire/
Vessels – Propulsion	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	
Vessels – Drilling Prime Engine, Auxiliary	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-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	
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://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s04.pdf https://cfpub.epa.gov/webfire/
Combustion Flare (no smoke)	lbs/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)	lbs/MMscf	2.10	2.10	2.10	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	https://www3.epa.gov/ttn/chief/ap42/ch13/final/C13S05_02-05-18.pdf
Combustion Flare (medium smoke)	lbs/MMscf	10.50	10.50	10.50	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
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
Storage Tank	tons/yr/tank						4.300				2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	https://www.boem.gov/environment/environmental-studies/2014-gulfwide-emission-inventory
Fugitives	lbs/hr/component						0.0005				API Study	12/93	https://www.api.org/
Glycol Dehydrator	tons/yr/dehydrator						19.240				2011 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2014	https://www.boem.gov/environment/environmental-studies/2011-gulfwide-emission-inventory
Cold Vent	tons/yr/vent						44.747				2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	https://www.boem.gov/environment/environmental-studies/2014-gulfwide-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_Newsroom/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-inventory-nei-data
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	3/19	https://www.epa.gov/air-emissions-inventories/2017-national-emissions-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

Natural Gas Flare Parameters	Value	Units
VOC Content of Flare Gas	0.6816	lb VOC/lb-mol gas
Natural Gas Flare Efficiency	98	%

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

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

AIR EMISSIONS COMPUTATION FACTORS

COMPANY	AREA		BLOCK	LEASE	FACILITY	WELL					CONTACT		PHONE		REMARKS										
LLOG Exploration Offshore, L	Ewing Bank		877 / 921	OCS-G-35295		Location E & Alt E					Susan Sachitana		985-801-4300		Drill Ship - Drilling & Completion Operations										
OPERATIONS	**EQUIPMENT**	**EQUIPMENT ID**	**RATING**	**MAX. FUEL**	**ACT. FUEL**	**RUN TIME**		**MAXIMUM POUNDS PER HOUR**									**ESTIMATED TONS**								
	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**	**CO**	**NH3**
DRILLING	VESSELS- Drilling - Propulsion Engine - Diesel		61800	3,179	76,305	24	150	43.60	26.30	25.51	0.63	1044.59	30.03	0.00	163.84	0.30	78.48	47.35	45.93	1.14	1880.26	54.06	0.01	294.91	0.55
	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		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		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
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
			BPD																						
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			162500		24	7	0.00	0.00	0.00	0.09	11.60	5.84	--	52.89	--	0.00	0.00	0.00	0.01	0.97	0.49	--	4.44	--
	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**																		
	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
2024	**Facility Total Emissions**							**43.60**	**26.30**	**25.51**	**0.73**	**1,056.19**	**35.87**	**0.00**	**216.73**	**0.30**	**78.48**	**47.35**	**45.93**	**1.15**	**1,881.23**	**54.55**	**0.01**	**299.36**	**0.55**
EXEMPTION CALCULATION	**DISTANCE FROM LAND IN MILES**																**2,231.10**			**2,231.10**	**2,231.10**	**2,231.10**		**56,086.99**	
	67.0																								
DRILLING	VESSELS- Crew Diesel		7200	370.4112	8889.87	6	64	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	0.98	0.59	0.57	0.01	23.47	0.67	0.00	3.68	0.01
	VESSELS - Supply Diesel		7200	370.4112	8889.87	10	129	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	3.27	1.97	1.91	0.05	78.24	2.25	0.00	12.27	0.02
	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
FACILITY INSTALLATION	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
	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
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 SOURCES	**On-Ice Equipment**			**GAL/HR**	**GAL/D**																				
	Man Camp - Operation (maximum people per day)		**PEOPLE/DAY**																						
	VESSELS		**kW**			**HR/D**	**D/YR**																		
	On-Ice – Loader			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 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		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	
	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
2024	**Non-Facility Total Emissions**							**10.16**	**6.13**	**5.95**	**0.15**	**243.40**	**7.00**	**0.00**	**38.18**	**0.07**	**4.24**	**2.56**	**2.48**	**0.06**	**101.71**	**2.92**	**0.00**	**15.95**	**0.03**

AIR EMISSIONS COMPUTATION FACTORS

COMPANY	AREA		BLOCK	LEASE	FACILITY	WELL					CONTACT		PHONE		REMARKS										
LLOG Exploration Offshore, LLC	Ewing Bank		877 / 921	OCS-G-35295,		Location E & Alt E					Susan Sachitana		985-801-4300		Drill Ship - Drilling & Completion Operations										
OPERATIONS	**EQUIPMENT**	**EQUIPMENT ID**	**RATING**	**MAX. FUEL**	**ACT. FUEL**	**RUN TIME**		**MAXIMUM POUNDS PER HOUR**									**ESTIMATED TONS**								
	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**	**CO**	**NH3**
DRILLING	VESSELS- Drilling - Propulsion Engine - Diesel		61800	3179.3628	76304.71	24	150	43.60	26.30	25.51	0.63	1044.59	30.03	0.00	163.84	0.30	78.48	47.35	45.93	1.14	1880.26	54.06	0.01	294.91	0.55
	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		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		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
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
			BPD																						
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			162500		24	7	0.00	0.00	0.00	0.09	11.60	5.84	--	52.89	--	0.00	0.00	0.00	0.01	0.97	0.49	--	4.44	--
	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**																		
	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
2025	**Facility Total Emissions**							**43.60**	**26.30**	**25.51**	**0.73**	**1,056.19**	**35.87**	**0.00**	**216.73**	**0.30**	**78.48**	**47.35**	**45.93**	**1.15**	**1,881.23**	**54.55**	**0.01**	**299.36**	**0.55**
EXEMPTION CALCULATION	**DISTANCE FROM LAND IN MILES**																**2,231.10**			**2,231.10**	**2,231.10**	**2,231.10**		**56,086.99**	
	67.0																								
DRILLING	VESSELS- Crew Diesel		7200	370.4112	8889.87	6	64	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	0.98	0.59	0.57	0.01	23.47	0.67	0.00	3.68	0.01
	VESSELS - Supply Diesel		7200	370.4112	8889.87	10	129	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	3.27	1.97	1.91	0.05	78.24	2.25	0.00	12.27	0.02
	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
FACILITY INSTALLATION	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
	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
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 SOURCES	**On-Ice Equipment**			**GAL/HR**	**GAL/D**																				
	Man Camp - Operation (maximum people per day)		**PEOPLE/DAY**																						
	VESSELS		**kW**			**HR/D**	**D/YR**																		
	On-Ice – Loader			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 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		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	
	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
2025	**Non-Facility Total Emissions**							**10.16**	**6.13**	**5.95**	**0.15**	**243.40**	**7.00**	**0.00**	**38.18**	**0.07**	**4.24**	**2.56**	**2.48**	**0.06**	**101.71**	**2.92**	**0.00**	**15.95**	**0.03**

AIR EMISSIONS CALCULATIONS

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL
LLOG Exploration Offshore, LLC	Ewing Bank	877 / 921	OCS-G-35295, OCS-G-36704 & OCS-G-36876		Location E & Alt E

Year	953 OCS-G-36062 Facility Emitted Substance								
	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3
2024	78.48	47.35	45.93	1.15	1881.23	54.55	0.01	299.36	0.55
2025	78.48	47.35	45.93	1.15	1881.23	54.55	0.01	299.36	0.55
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
2033	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Allowable	2231.10			2231.10	2231.10	2231.10		56086.99	

OMB Control No. 1010-0151
OMB Approval Expires: 08/31/2023

COMPANY	LLOG Exploration Offshore, LLC
AREA	EWING BANK
BLOCK	877 / 921
LEASE	OCS-G-35295, OCS-G-36704 & OCS-G-36876
FACILITY	
WELL	Location E & Alt E
COMPANY CONTACT	Susan Sachitana
TELEPHONE NO.	985-801-4300
REMARKS	DP Semisubmersible - Drilling & Completion Operations

AIR EMISSIONS COMPUTATION FACTORS

Fuel Usage Conversion Factors	Natural Gas Turbines				Natural Gas Engines		Diesel Recip. Engine		Diesel Turbines			
	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/hp-hr		0.0086	0.0086	0.0026	1.4515	0.0095	N/A	0.3719	N/A	AP42 3.1-1& 3.1-2a	4/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf
RECIP. 2 Cycle Lean Natural Gas	g/hp-hr		0.1293	0.1293	0.0020	6.5998	0.4082	N/A	1.2009	N/A	AP42 3.2-1	7/00	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	0.4014	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://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s03.pdf 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/
Vessels – Propulsion	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	
Vessels – Drilling Prime Engine, Auxiliary	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-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	
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://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s04.pdf https://cfpub.epa.gov/webfire/
Combustion Flare (no smoke)	lbs/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)	lbs/MMscf	2.10	2.10	2.10	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
Combustion Flare (medium smoke)	lbs/MMscf	10.50	10.50	10.50	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	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
Storage Tank	tons/yr/tank						4.300				2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	https://www.boem.gov/environment/environmental-studies/2014-gulfwide-emission-inventory
Fugitives	lbs/hr/component						0.0005				API Study	12/93	https://www.api.org/
Glycol Dehydrator	tons/yr/dehydrator						19.240				2011 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2014	https://www.boem.gov/environment/environmental-studies/2011-gulfwide-emission-inventory
Cold Vent	tons/yr/vent						44.747				2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	https://www.boem.gov/environment/environmental-studies/2014-gulfwide-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_Newsroom/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-inventory-nei-data
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	3/19	https://www.epa.gov/air-emissions-inventories/2017-national-emissions-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

Natural Gas Flare Parameters	Value	Units
VOC Content of Flare Gas	0.6816	lb VOC/lb-mol gas
Natural Gas Flare Efficiency	98	%

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

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

AIR EMISSIONS CALCULATIONS - 1ST YEAR

COMPANY	AREA		BLOCK	LEASE	FACILITY	WELL					CONTACT		PHONE		REMARKS										
LLOG Exploration Offshore, LLC	EWING BANK		877 / 921	OCS-G-3529		Location E & Alt E					Susan Sachitana		985-801-4300		DP Semisubmersible - Drilling & Completion Operations										
OPERATIONS	EQUIPMENT	EQUIPMENT ID	RATING	MAX. FUEL	ACT. FUEL	RUN TIME		MAXIMUM POUNDS PER HOUR									ESTIMATED TONS								
	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	CO	NH3
DRILLING	VESSELS- Drilling - Propulsion Engine - Diesel		61200	3,148	75,564	24	150	43.18	26.05	25.27	0.63	1034.45	29.74	0.00	162.25	0.30	77.72	46.89	45.48	1.13	1862.00	53.54	0.01	292.05	0.54
	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		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		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
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
			BPD																						
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			162500		24	7	0.00	0.00	0.00	0.09	11.60	5.84	--	52.89	--	0.00	0.00	0.00	0.01	0.97	0.49	--	4.44	--
	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**																		
	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
2024	**Facility Total Emissions**							**43.18**	**26.05**	**25.27**	**0.72**	**1,046.05**	**35.58**	**0.00**	**215.14**	**0.30**	**77.72**	**46.89**	**45.48**	**1.14**	**1,862.98**	**54.03**	**0.01**	**296.49**	**0.54**
EXEMPTION CALCULATION	**DISTANCE FROM LAND IN MILES**																**2,231.10**			**2,231.10**	**2,231.10**	**2,231.10**		**56,086.99**	
	67.0																								
DRILLING	VESSELS- Crew Diesel		7200	370.4112	8889.87	6	64	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	0.98	0.59	0.57	0.01	23.47	0.67	0.00	3.68	0.01
	VESSELS - Supply Diesel		7200	370.4112	8889.87	10	129	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	3.27	1.97	1.91	0.05	78.24	2.25	0.00	12.27	0.02
	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
FACILITY INSTALLATION	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
	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
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 SOURCES	**On-Ice Equipment**			**GAL/HR**	**GAL/D**																				
	Man Camp - Operation (maximum people per day)		**PEOPLE/DAY**																						
	VESSELS		**kW**			**HR/D**	**D/YR**																		
	On-Ice – Loader			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 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		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	
	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
2024	**Non-Facility Total Emissions**							**10.16**	**6.13**	**5.95**	**0.15**	**243.40**	**7.00**	**0.00**	**38.18**	**0.07**	**4.24**	**2.56**	**2.48**	**0.06**	**101.71**	**2.92**	**0.00**	**15.95**	**0.03**

AIR EMISSIONS CALCULATIONS - 1ST YEAR

COMPANY	AREA		BLOCK	LEASE	FACILITY	WELL					CONTACT		PHONE		REMARKS										
LLOG Exploration Offshore, LLC	EWING BANK		877 / 921	OCS-G-35295,		Location E & Alt E					Susan Sachitana		985-801-4300		DP Semisubmersible - Drilling & Completion Operations										
OPERATIONS	**EQUIPMENT**	**EQUIPMENT ID**	**RATING**	**MAX. FUEL**	**ACT. FUEL**	**RUN TIME**		**MAXIMUM POUNDS PER HOUR**									**ESTIMATED TONS**								
	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**	**CO**	**NH3**
DRILLING	VESSELS- Drilling - Propulsion Engine - Diesel		61200	3148.4952	75563.88	24	150	43.18	26.05	25.27	0.63	1034.45	29.74	0.00	162.25	0.30	77.72	46.89	45.48	1.13	1862.00	53.54	0.01	292.05	0.54
	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		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		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
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
			BPD																						
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			162500		24	7	0.00	0.00	0.00	0.09	11.60	5.84	--	52.89	--	0.00	0.00	0.00	0.01	0.97	0.49	--	4.44	--
	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**																		
	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
2025	**Facility Total Emissions**							**43.18**	**26.05**	**25.27**	**0.72**	**1,046.05**	**35.58**	**0.00**	**215.14**	**0.30**	**77.72**	**46.89**	**45.48**	**1.14**	**1,862.98**	**54.03**	**0.01**	**296.49**	**0.54**
EXEMPTION CALCULATION	**DISTANCE FROM LAND IN MILES**																**2,231.10**			**2,231.10**	**2,231.10**	**2,231.10**		**56,086.99**	
	67.0																								
DRILLING	VESSELS- Crew Diesel		7200	370.4112	8889.87	6	64	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	0.98	0.59	0.57	0.01	23.47	0.67	0.00	3.68	0.01
	VESSELS - Supply Diesel		7200	370.4112	8889.87	10	129	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	3.27	1.97	1.91	0.05	78.24	2.25	0.00	12.27	0.02
	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
FACILITY	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	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
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 SOURCES	**On-Ice Equipment**			**GAL/HR**	**GAL/D**																				
	Man Camp - Operation (maximum people per day)		**PEOPLE/DAY**																						
	VESSELS		**kW**			**HR/D**	**D/YR**																		
	On-Ice – Loader			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 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		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	
	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
2025	**Non-Facility Total Emissions**							**10.16**	**6.13**	**5.95**	**0.15**	**243.40**	**7.00**	**0.00**	**38.18**	**0.07**	**4.24**	**2.56**	**2.48**	**0.06**	**101.71**	**2.92**	**0.00**	**15.95**	**0.03**

AIR EMISSIONS CALCULATIONS

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL
LLOG Exploration Offshore, LLC	EWING BANK	877 / 921	OCS-G-35295, OCS-G-36704 & OCS-G-36876		Location E & Alt E

Year	Facility Emitted Substance								
	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3
2024	77.72	46.89	45.48	1.14	1862.98	54.03	0.01	296.49	0.54
2025	77.72	46.89	45.48	1.14	1862.98	54.03	0.01	296.49	0.54
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
2033	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Allowable				2231.10	2231.10	2231.10		56086.99	

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

A. Oil Spill Response Planning

All the proposed activities in this Revised Exploration Plan will be covered by the Oil Spill Response Plan filed by LLOG (No. 02058) in accordance with 30 CFR 254, our biennial update was found to be "in-compliance" on September 8, 2022.

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	Fort Jackson, 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.

D. Worst-Case Scenario Information

Category	*Regional OSRP*	*EP*
Type of Activity	Exploratory MODU	Exploratory MODU
Facility Surface Location	**Mississippi Canyon Block 386/387**	**Ewing Bank Block 877**
Facility Description	Location Well 001 (Revised Location B)	Location A (001)
Distance to Nearest Shoreline (Miles)	58 miles	67 miles
Volume: Storage Tanks (total) Facility Piping (total) Lease Term Pipeline Uncontrolled Blowout (day) Barging **Potential 24 Hour Volume (bbls)**	**396,602 bbls**	**222,538 bbls**
Type of Liquid Hydrocarbon	Crude Oil	Crude Oil
API Gravity	25º	27.5°

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, filed by LLOG (No. 02058) in accordance with 30 CFR 254, our biennial update was found to be "in-compliance" on September 8, 2022.

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 Plan filed by LLOG (Operator No.02058) in accordance with 30 CFR 254 Biennial update modification approved on July 21, 2020 and since the worst case discharge determined in Exploration Plan for Mississippi Canyon Block 387 is the worst case discharge outlined 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 this Exploration Plan.

LLOG Exploration Offshore, L.L.C., Company No. 02058, previously submitted the Regional OSRP Exploration WCD volume in Plan R-6763, Revised Exploration Plan, which was approved on November 2, 2018.

The required proprietary data outlined in NTL 2015-N01 was submitted to BOEM within the Confidential Copy of the Revised Exploration Plan, R-6763.

LLOG Exploration Offshore, L.L.C., Company No. 02058 will not use any new or unusual technology in responding to an oil spill.

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 222,538 barrels of crude oil with an API gravity of 27.5°.

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 a 7% probability of impact to the shorelines of Cameron Parish, Louisiana within 30 days. Cameron Parish includes the east side of Sabine Lake, Sabine National Wildlife Refuge, Calcasieu Lake, Lacassine National Wildlife Refuge (inland) and Grand Lake. Cameron Parish also includes the area along the coastline from Sabine Pass to Big Constance Lake in Rockefeller Wildlife Refuge. This region is composed of open public beaches, marshlands and swamps. It serves as a habitat for numerous birds, finfish and other animals, including several rare, threatened and endangered species.

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 17% or approximately 37,831 barrels of crude oil would be evaporated/dispersed within 24 hours, with approximately 184,707 barrels remaining.

Spill Response EW 877	**Barrels of Oil**
WCD Volume	222,538
Less 17% natural evaporation/dispersion	37,831
Remaining volume	184,707

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 and MSRC spill response equipment, with a total derated skimming capacity of 591,241 barrels. Temporary storage associated with skimming equipment equals 124,496 barrels. If additional storage is needed, various tank barges with a total of 475,000+ 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 Cameron 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 235,300 barrels. Temporary storage associated with skimming equipment equals 2,841 barrels. If additional storage is needed, various tank barges with a total of 256,000+ 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. A Master Service Agreement with OMI Environmental will ensure access to 38,050 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 69 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:

- 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, but in coordination to complete a common objective, in a small area and 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
    - 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^3 vessels for easy aerial identification
- Designate and employ C^3 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
Operating parameters			
Sea State	3-5 ft max	9.8 ft max	3-5 ft max
Skimming speed	≤1 kt	≤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 Boxes	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 Coast Guard, the water is decanted from the bottom of the tank back into the water ahead 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 ≤ 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 ≤ 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

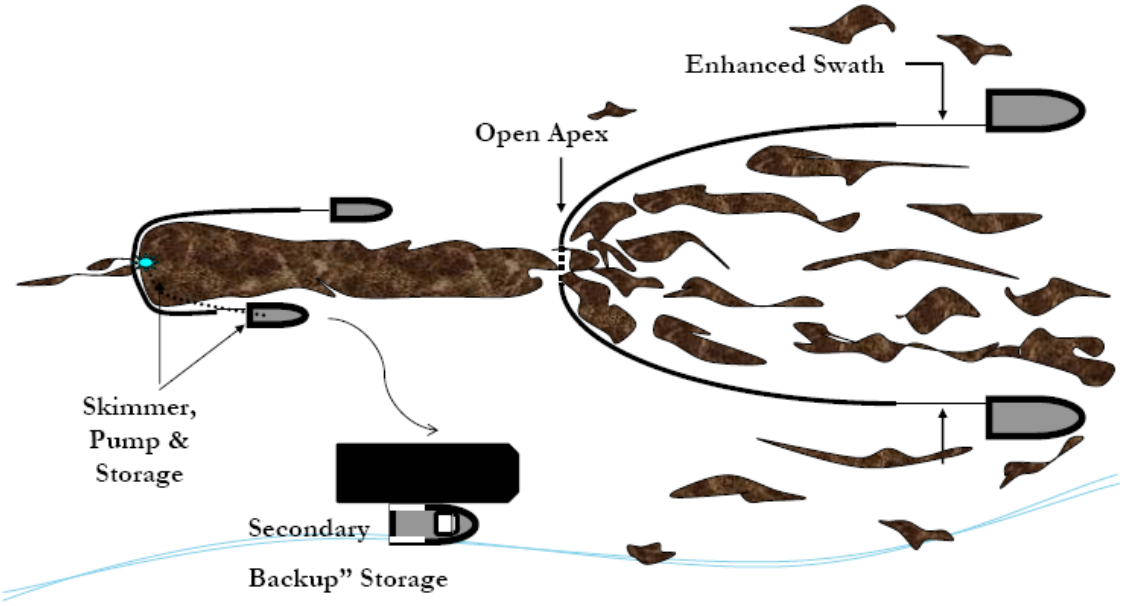
Mechanical Recovery – Deployed on large vessels of opportunity (VOO) the Koseq Rigid Sweeping Arms are high volume surge capacity deployed to increase recovery capacity at the source of a large oil spill in the offshore and outer nearshore environment of the Gulf of Mexico. They are highly mobile and 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.

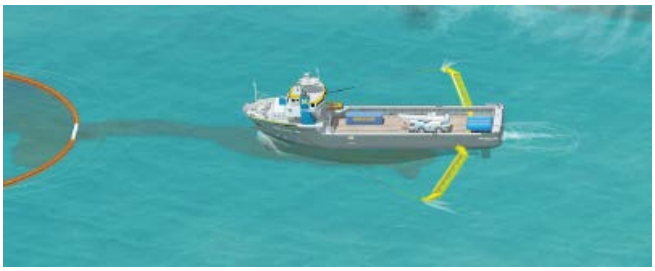
Command and Control – The large OSVs in many cases have state of the art communication and electronic systems, as well as the accommodations to support the function of directing all skimming operations offshore and reporting back to the command post.

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

1 – $\geq$ 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 pf 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
    - 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 up-to-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˚F during the summer months. During the winter, the average temperature will range from 50 and 60˚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 (%) within 30 days
Exploratory Drilling **EW 877** *67 miles from shore*	G35295	C42	Matagorda, TX Galveston, TX Jefferson, TX **Cameron, LA** Vermilion, LA Iberia, LA Terrebonne, LA Lafourche, LA Jefferson, LA Plaquemines, LA	1 2 2 **7** 3 1 3 2 1 5

WCD Scenario– <u>BASED ON WELL BLOWOUT DURING DRILLING OPERATIONS</u> (67 miles from shore)
184,707 bbls of crude oil (Volume considering natural weathering)
API Gravity 27.5°

FIGURE 2 – Equipment Response Time to EW 877

Dispersants/Surveillance

Dispersant/Surveillance	Dispersant Capacity (gal)	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to site	Total Hrs
ASI							
Basler 67T	2000	2	Houma, LA	2	2	0.6	4.6
DC 3	1200	2	Houma, LA	2	2	0.7	4.7
DC 3	1200	2	Houma, LA	2	2	0.7	4.7
Aero Commander	NA	2	Houma, LA	2	2	0.6	4.6
MSRC							
C-130 Spray AC	3,250	2	Kiln, MS	3	0	0.5	3.5
King Air BE90 Spray AC	250	2	Kiln, MS	3	0	0.8	3.8

Offshore Response

Offshore Equipment No Staging	EDRC	Storage Capacity	VOO	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	5	Harvey	6	0	12	8.1	2	28.1
95’ FRV	22885	249	NA	4	Leeville	2	0	2	3.5	1	8.5
95’ FRV	22885	249	NA	4	Venice	2	0	3	3.5	1	9.5
95’ FRV	22885	249	NA	4	Vermilion	2	0	3	6	1	12
95’ FRV	22885	249	NA	4	Galveston	2	0	2	15	1	20
Boom Barge (CGA-300) 42” Auto Boom (25000’)	NA	NA	1 Tug 50 Crew	4 (Barge) 2 (Per Crew)	Leeville	8	0	4	9.5	2	23.5

Offshore Equipment Pre-determined Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
MSRC											
Louisiana Responder Stress I + OSRV *2,640' 67" Curtain Pressure Boom*	15840	4000	NA	14	Fort Jackson	2	0	4.5	11.5	1	19
MSRC 452 Offshore Barge 1 Crucial Disk 88/30 1 Desmi Ocean *2,640' 67" Curtain Pressure Boom*	11122 3017	45000	3 Tugs	6	Fort Jackson	2.5	0	6	20	1	29.5
Mississippi Responder Stress I + OSRV *2,640' 67" Curtain Pressure Boom*	15840	4000	NA	14	Pascagoula	2	0	2	16	1	21
MSRC 402 Offshore Barge 2 Crucial Disk 88/30 *2,640' 67" Curtain Pressure Boom*	22244	40300	3 Tugs	6	Pascagoula	2.5	0	3	27.5	1	34
S.T. Benz Responder LFF 100 Brush + OSRV *2,640' 67" Curtain Pressure Boom*	18086	4000	NA	14	Fourchon	2	0	1	6	1	10
Gulf Coast Responder Stress I + OSRV *2,640' 67" Curtain Pressure Boom*	15840	4000	NA	14	Lake Charles	2	0	4	19	1	26

Recovered Oil Storage No Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
Kirby (available through contract with CGA)											
RO Barge	NA	80000+	1 Tug	6	Venice	47	0	4	8	1	60
RO Barge	NA	80000+	1 Tug	6	Venice	47	0	4	8	1	60
RO Barge	NA	80000+	1 Tug	6	Venice	47	0	4	8	1	60
RO Barge	NA	80000+	1 Tug	6	Venice	47	0	4	8	1	60
RO Barge	NA	110000+	1 Tug	6	Venice	47	0	4	8	1	60
Enterprise Marine Services LLC (available through contract with CGA)											
CTCo 2603	NA	25000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 2604	NA	20000	1 Tug	6	Amelia	26	0	6	15	1	48

Staging Area: Venice

Offshore Equipment With Staging	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Site	Hrs to Deploy	Total Hrs
CGA											
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Galveston	2	6	12.7	5.5	1	27.2
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Vermilion	2	6	6.5	5.5	1	21
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Aransas Pass	2	6	17.7	5.5	1	32.2
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Lake Charles	2	6	8	5.5	1	22.5
FRU (2) + 100 bbl Tank (4)	8502	400	2 Utility	12	Leeville	2	6	4.4	5.5	1	18.9
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Morgan City	2	6	4.9	5.5	1	19.4
FRU (2) + 100 bbl Tank (4)	8502	400	2 Utility	12	Venice	2	6	2	5.5	1	16.5
T&T Marine (available through contract with CGA)											
Aqua Guard Triton RBS (1)	22323	2000	1 Utility	6	Galveston	4	12	13	5.5	2	36.5
Aqua Guard Triton RBS (1)	22323	2000	1 Utility	6	Harvey	4	12	2	5.5	2	25.5
Koseq Skimming Arms (6) MariFlex 150 HF	108978	6000	3 OSV	18	Galveston	24	24	13	5.5	2	68.5
Koseq Skimming Arms (2) Lamor brush	45770	2000	1 OSV	6	Harvey	24	24	2	5.5	2	57.5
Koseq Skimming Arms (4) MariFlex 150 HF	72652	4000	2 OSV	12	Harvey	24	24	2	5.5	2	57.5
MSRC											
Crucial Disk 88/30 Skimmer (1) *1,320‘ 67” Curtain Pressure*	11122	400	1 PSV	14	Fort Jackson	1	2	0.5	9	1	13.5

Offshore Equipment With Staging	VOO	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Site	Hrs to Deploy	Total Hrs
CGA									
Hydro-Fire Boom	8 Utility	40	Harvey	0	24	2	5.5	6	37.5
MSRC									
67” Curtain Pressure Boom (27000’)	14*	14	Houston	1	2	12	9	1	25
Hydro Fire Boom	8*	8	Houston	1	4	12	9	6	32

**Could be Utility Boats, Crew Boats, Supply Boats, or Fishing Vessels*

Nearshore Response

Nearshore Equipment Pre-determined Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
CGA											
Mid-Ship SWS	22885	249	NA	4	Leeville	2	0	N/A	48	1	51
Mid-Ship SWS	22885	249	NA	4	Venice	2	0	N/A	48	1	51
Mid-Ship SWS	22885	249	NA	4	Galveston	2	0	N/A	48	1	51
Trinity SWS	21500	249	NA	4	Morgan City	2	0	N/A	48	1	51
Trinity SWS	21500	249	NA	4	Lake Charles	2	0	N/A	48	1	51
Trinity SWS	21500	249	NA	4	Vermilion	2	0	N/A	48	1	51
Trinity SWS	21500	249	NA	4	Galveston	2	0	N/A	48	1	51
46’ FRV	15257	65	NA	4	Aransas Pass	2	0	2	16	1	21
46’ FRV	15257	65	NA	4	Morgan City	2	0	2	6	1	11
46’ FRV	15257	65	NA	4	Lake Charles	2	0	2	2.5	1	7.5
46’ FRV	15257	65	NA	4	Venice	2	0	2	11	1	16
Enterprise Marine Services LLC (Available through contract with CGA)											
CTCo 2605	NA	20000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 2606	NA	20000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 2607	NA	23000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 2608	NA	23000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 2609	NA	23000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 5001	NA	47000	1 Tug	6	Amelia	26	0	6	15	1	48
Kirby Offshore (Available through contract with CGA)											
RO Barge	NA	100000+	1 Tug	6	Venice	25	0	4	30	1	60

Staging Area: Cameron

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	5	2	1	12
SWS Egmopol	1810	100	NA	3	Morgan City	2	2	4.5	2	1	11.5
SWS Marco	3588	20	NA	3	Lake Charles	2	2	2	2	1	9
SWS Marco	3588	34	NA	3	Leeville	2	2	7	2	1	14
SWS Marco	3588	34	NA	3	Venice	2	2	9.5	2	1	16.5
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Lake Charles	4	12	2	2	2	22
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Galveston	4	12	5	2	2	25
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Harvey	4	12	7	2	2	27
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Lake Charles	2	2	2	2	1	9
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Harvey	2	2	7	2	1	14
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Lake Charles	2	2	2	2	1	9
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Harvey	2	2	7	2	1	14

Shoreline Protection

Staging Area: Cameron

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
OMI Environmental (Available through MSA)									
4,850’ 18” Boom	2 Crew	4	Belle Chasse, LA	1	1	2	2	3	9
8,000’ 18” Boom	3 Crew	6	Port Allen, LA	1	1	5	2	3	12
2,000’ 18” Boom	1 Crew	2	Houma, LA	1	1	4	2	3	11
2,500’ 18” Boom	1 Crew	2	Morgan City, LA	1	1	5	2	3	12
1,600’ 18” Boom	1 Crew	2	Gonzalez, LA	1	1	4	2	3	11
5,800’ 18” Boom	5 Crew	10	Venice, LA	1	1	0	2	3	7
13,300’ 18” Boom	5 Crew	10	Harvey, LA	1	1	2	2	3	9

Wildlife Response	EDRC	Storage Capacity	VOO	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	7	1	2	14
Bird Scare Guns (24)	NA	NA	NA	2	Harvey	2	2	7	1	2	14
Bird Scare Guns (12)	NA	NA	NA	2	Galveston	2	2	3.6	1	2	10.6
Bird Scare Guns (12)	NA	NA	NA	2	Aransas Pass	2	2	9.9	1	2	16.9
Bird Scare Guns (48)	NA	NA	NA	2	Lake Charles	2	2	2	1	2	9
Bird Scare Guns (24)	NA	NA	NA	2	Leeville	2	2	6.8	1	2	13.8

Response Asset	Total
Offshore EDRC (bbls)	591,241
Offshore Recovered Oil Storage (bbls)	599,496+
Nearshore / Shallow Water EDRC (bbls)	235,300
Nearshore / Shallow Water Recovered Oil Storage (bbls)	258,841+

APPENDIX I
ENVIRONMENTAL MONITORING INFORMATION
(30 CFR PART 550.221 AND 550.252)

A. Monitoring Systems

LLOG subscribes to StormGeo Weather Service which provides access to real-time weather conditions and provides periodic updates on impending inclement weather conditions such as tropical depressions, storms and/or hurricanes entering the Gulf of Mexico.

LLOG also relies on the National Weather Service to support the aforementioned subscribed service. During impending inclement weather conditions, LLOG closely coordinates the activity with our contractors and field personnel to ensure the safety of people for evacuation; measures to prepare the facility for evacuation to ensure protection of the environment and the facility/equipment.

Ewing Bank Block 877 is in water depths greater than 400 meters (1,312'); therefore LLOG will follow the guidelines of the applicable NTL 2018-G01 by monitoring and gathering ocean current data using Acoustic Doppler Current Profile (ADCP) while the MODU is on location.

B. Incidental Takes

LLOG is sensitive to the marine life and the environment we work in, especially regarding activities in or around the moon pool. LLOG will implement and adhere to, the BSEE NTL No. 2015-G03 "Marine Trash and Debris Awareness Training and Elimination" and BOEM NTL No. 2016-G01 "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting", and BOEM NTL No. 2016-G02 "Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program". Moon pool daily observation log shall be maintained on the bridge. The deck supervisor on tour shall go to the bridge and log time, date, and results of each moon pool inspection. STOP WORK AUTHORITY shall be used and implemented, in a safe and timely manner, for any work that could affect marine life listed on the Endangered Species Act.

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent

materials such as plastic or glass. LLOG will collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (previously "All Washed Up: The Beach Litter Problem"). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.
Contract vessel operators can avoid marine mammals and reduce potential deaths by maintaining a vigilant watch for marine mammals and maintaining a safe distance of 91 meters or greater from whales and a distance of 45 meters or greater from small cetaceans. When assemblages of cetaceans are observed vessel speeds will be reduced to 10 knots or less. Vessel personnel should use a Gulf of Mexico reference guide to help identify the twenty-one species of whales and dolphins, and the single species of manatee that may be encountered in the Gulf of Mexico OCS. Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion, BOEM NTL 2016-G01 "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting" and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

Vessel personnel must report sightings of any injured or dead protected marine mammal species immediately, regardless of whether the injury or death is caused by their vessel, to the NMFS Southeast Marine Mammal Stranding Hotline at (877) WHALE-HELP (877-942-5343). Additional information may be found at the following website:
(https://www.fisheries.noaa.gov/report). Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.
These proposed operations may utilize a moon pool(s) to conduct various subsea activities. LLOG's contractor or company representative will provide a dedicated crew member to monitor and continually survey the moon pool area during the operations for sea turtles. If any sea turtle is detected in the moon pool, LLOG will cease operations and contact NMFS at nmfs.psoreview@noaa.gov and BSEE at protectedspecies@bsee.gov and 985-722-7902 for additional guidance and incidental report information. The procedures found in Appendix J of the NMFS Biological Opinion will be employed to free entrapped or entangled marine life safely.

The specific rig that will be used in the proposed operations has not been identified. A deepwater drilling rig, most likely a dual activity dynamically positioned Drillship with a moonpool will be necessary for the operations. Moonpools on Drillships range in size from 35ft to 45ft in width and 70ft to 130ft in length. The moonpool, located underneath the drilling rig rotary floor, is open to the sea below to allow for passage of wellbore equipment necessary for the construction of the well on the seafloor.

The proposed operations covered by this plan include the drilling and completion of one well. The estimated time to conduct these operations through the moonpool involves approximately 150 drilling days and 150 completion days for the well.

The initial start of each drilling operation consists of 7 days of riserless drilling operations where the drilling tools are tripped in and out through the moonpool to the seabed to drill and install the conductor and surface casings and the subsea wellhead which will be installed 10 feet above the seafloor. After the wellhead is in place and included in this initial 7 day time frame, the Blowout Preventer (BOP) will be run on joints of riser through the moonpool and the BOP will be latched onto the wellhead with the joints of riser pipe extending through the moonpool and connected to the rig floor. The remainder of the drilling operations (143 days) will be conducted through the inside of the riser pipe. The riser pipe will be the only equipment utilized through the moonpool during this time frame. At the end of the drilling operation, the riser and BOP will be retrieved by pulling the equipment through the moonpool and storing on the rig.

The completion operations will involve running the BOP and riser through the moonpool and latching the BOP to the wellhead with joints of riser pipe extending through the moonpool and connected to the rig floor. The entire completion operation will be conducted through the inside of the riser pipe. The riser pipe will be the only equipment utilized through the moonpool during this operation. At the end of the completion, the BOP and riser will be retrieved by pulling the equipment through the moonpool and storing on the rig. The estimated 150 completion days includes 2 days to run the BOP and riser and 2 days to retrieve the equipment.

C. Flower Garden Banks National Marine Sanctuary

This section of the plan is not applicable to the proposed operations.

APPENDIX J
LEASE STIPULATIONS/SPECIAL CONDITIONS INFORMATION
(30 CFR PART 550.222 AND 550.253)

A. Lease Stipulations

Minerals Management Service (BOEM) invoked Stipulation No. 8 – Protected Species on Lease OCS-G-35295, Ewing Bank Block 877.

Lease Stipulation No. 8 references measures to minimize or avoid potential adverse impacts to protected species (sea turtles, marine mammals, gulf sturgeon, and other federally protected species). Lease Stipulation No. 1 states archaeological resource means any prehistoric or historic district, site, building, structure, or object (including shipwrecks). BOEM has issued Notice to Lessees BOEM NTL No. 2016-G02 "Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program", BOEM NTL No. 2016-G01 "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting" and BSEE NTL No. 2015-G03 "Marine Trash and Debris Awareness and Elimination". There is no reason to believe that any sea turtles will be "taken" as a result of the operations proposed under this plan.

APPENDIX K
ENVIRONMENTAL MITIGATION MEASURES INFORMATION
(30 CFR Part 550.23 and 550.54)

A. Measures Taken to Avoid, Minimize, and Mitigate Impacts

This section does not apply to the operations as proposed herein.

B. Incidental Takes

LLOG is sensitive to the marine life and the environment we work in, especially regarding activities in or around the moon pool. LLOG will implement and adhere to, the BSEE NTL No. 2015-G03 "Marine Trash and Debris Awareness Training and Elimination"; BOEM NTL No. 2016-G01 "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting"; and BOEM NTL No. 2016-G02 "Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program". LLOG will also comply with the Appendix B, C & J of the Biological Opinion as further stated in Appendix I of this plan.

APPENDIX L
RELATED FACILITIES AND OPERATIONS INFORMATION
(30 CFR PART 550.256)

A. Produced Liquid Hydrocarbon Transportation Vessels

Not applicable to proposed operations.

APPENDIX M
SUPPORT VESSELS AND AIRCRAFT INFORMATION
(30 CFR PART 550.224 AND 550.257)

A. General

Personnel involved in the proposed operations will typically use their own vehicles as transportation to and from the selected onshore base; whereas the selected vendors will transport the equipment by a combination of trucks, boats and/or helicopters to the onshore base. The personnel and equipment will then be transported to the drilling rig via the transportation methods and frequencies shown, taking the most direct route feasible as mandated by weather and traffic conditions. Vessel personnel must report sightings of any injured or dead protected marine mammal species immediately, regardless of whether the injury or death is caused by their vessel, to the NMFS Southeast Marine Mammal Stranding Hotline at (877) WHALE-HELP (877-942-5343). Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment / entanglement by email to protectedspecies@boem.gov and protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

Drillship and DP Semisubmersible Rig:

Type	Maximum Fuel Tank Storage Capacity	Maximum No. in Area at Any Time	Trip Frequency or Duration
Supply Boats	500 bbls	1	Six times weekly
Crew Boats	500 bbls	1	Three times weekly
Aircraft	279 gallons	1	As Needed

B. Diesel Oil Supply Vessels

Size of Fuel Supply Vessel	Capacity of fuel Supply Vessel	Frequency of Fuel Transfers	Route Fuel Supply Vessel Will Take
180' OSV	1900 bbls	1/weekly	Fourchon, LA to **Ewing Bank Block 877**

C. Drilling Fluids Transportation

See Table 2 – Wastes you will Transport and/or Dispose of Onshore, located in Appendix F of this Plan.

D. Solid and Liquid Wastes Transportation

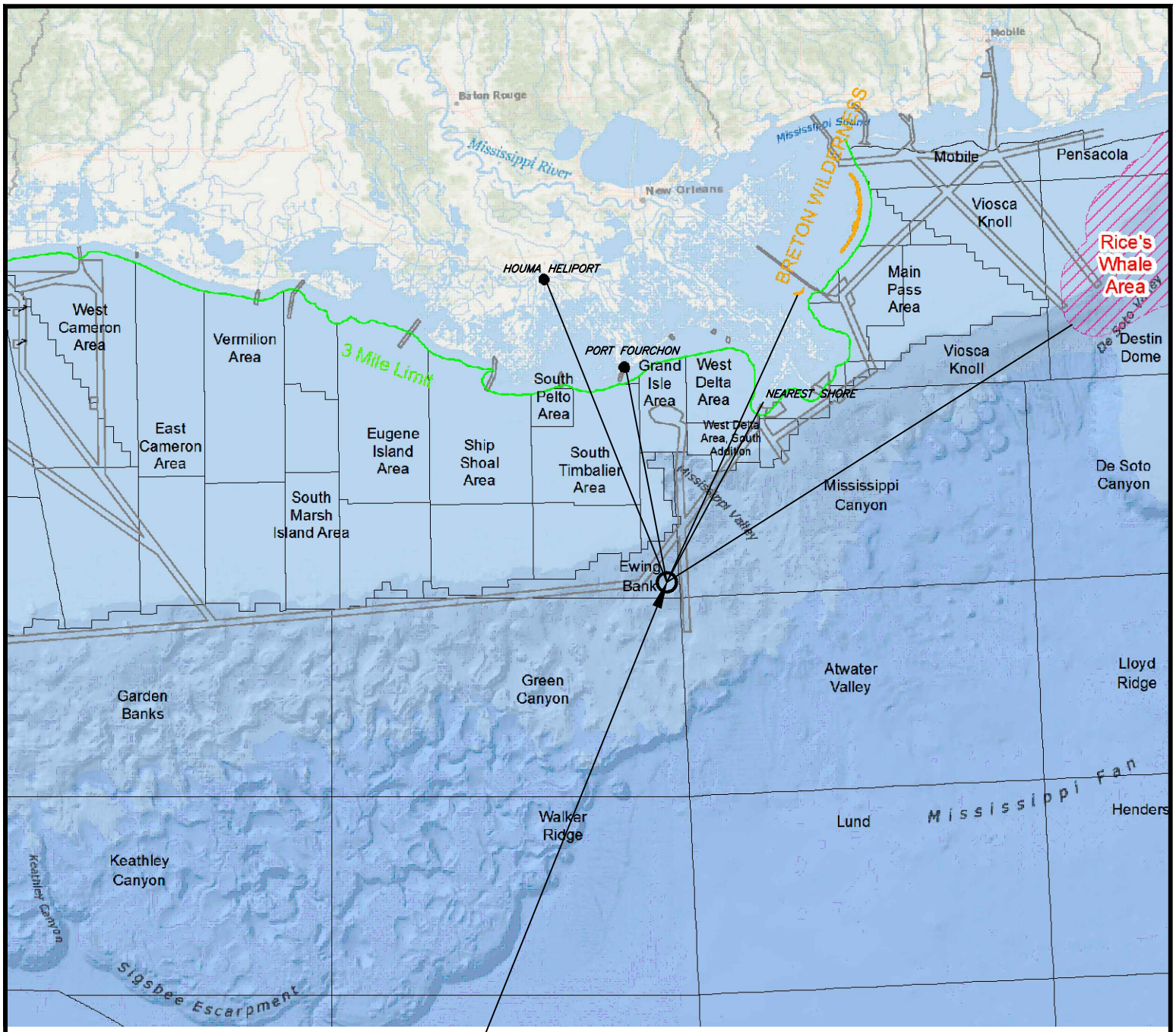
See Table 2 – Wastes you will Transport and/or Dispose of Onshore, located in Appendix F of this Plan.

E. Vicinity Map

Vicinity Plat showing the location of **Ewing Bank Block 877** relative to the nearest shoreline and onshore base is included as ***Attachment M-1.*** Any rigs, vessels, supply boats, etc. utilized for these proposed activities will not transit the Rice's whale area.

Vicinity Map

Attachment M-1
(Public Information)



SITE OF PROPOSED WELLS

~67 STATUTE (59 NAUTICAL) MILES TO PLAQUEMINES PARISH (NEAREST SHORE)
COORDINATE TO NEAREST POINT ON SHORELINE X = 2,787,634 Y = 10,512,021
~73 STATUTE (63 NAUTICAL) MILES TO PORT FOURCHON, LA
~111 STATUTE (96 NAUTICAL) MILES TO HOUMA HELIPORT, HOUMA, LA
~236 STATUTE (205 NAUTICAL) MILES TO RICE'S WHALE AREA
~170 KILOMETERS TO BRETON WILDERNESS

VICINITY MAP

THE DISTANCES SHOWN HEREON ARE FROM THE PROPOSED WELL TO THE NEAREST COASTLINE POINT AS OBTAINED FROM NOAA, ENTITLED NOAA MEDIUM RESOLUTION SHORELINE. <HTTP://SHORELINE.NOAA.GOV/DATA/DATASHEETS/MEDRES.HTML>.

LLOG EXPLORATION OFFSHORE, L.L.C.

LLOG exploration

Echo OFFSHORE LLC
36499 Perkins Road
Prairieville, Louisiana 70769
Tel: 225-673-2163

NOT TO SCALE

EXPLORATION PLAT

PROPOSED WELL 'E' & 'ALT E'
OCS-G 36876 BLOCK 921 WITH SURFACE BLOCK 877
EWING BANK AREA

GULF OF MEXICO

DRAWN BY: RJN	CHK. BY.: MEK	REV. No.:	JOB No.: 22-058	DWG No.: 22-058-EXP_EW921
DATUM: NAD 27	SPHEROID: CLARKE 1866	PROJECTION: U.T.M.	ZONE: 15	DATE: 10/24/2022	REV. DATE:	SCALE: N.T.S.	SHEET 1 OF 1

APPENDIX N
ONSHORE SUPPORT FACILITIES INFORMATION
(30 CFR PART 550.225 AND 550.258)

A. General

The proposed surface disturbances in **Ewing Bank Block 877** will be located approximately 67 statute miles from the nearest Louisiana shoreline, and approximately 73 statute miles from the following onshore support base and 111 statute miles from PHI Heliport in Houma and the proposed surface disturbances:

Name	Location	Existing/New/Modified
GIS Yard	Fourchon, LA	Existing
PHI US LLC – Heliport	Houma, LA	Existing

LLOG will use an existing onshore base to accomplish the following routine operations:

- Loading/Offloading point for equipment supporting the offshore operations.
- Dispatching personnel and equipment and does not anticipate the need for any expansion of the selected facilities as a result of the activities proposed in this Initial Plan.
- Temporary storage for materials and equipment.
- 24 Hour Dispatcher

B. Support Base Construction or Expansion

The proposed operations are temporary in nature and do not require any immediate action to acquire additional land or expand existing base facilities.

C. Support Base Construction or Expansion Timetable

This section of the plan is not applicable to the proposed operations.

D. Waste Disposal

See Table 2 – Wastes you will Transport and/or Dispose of Onshore, located in Appendix F of this Plan.

APPENDIX O
COASTAL ZONE MANAGEMENT ACT (CZMA) INFORMATION
(30 CFR PART 550.226 AND 550.260)

A. Consistency Certification

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A certificate of Coastal Zone Management Consistency for the State of Louisiana is enclosed as ***Attachments O-1***.

B. Other Information

LLOG has considered all of Louisiana's enforceable policies and certifies the consistency for the proposed operations.

Coastal Zone Management Consistency Statement for the State of Louisiana

Attachment O-1
(Public Information)

COASTAL ZONE MANAGEMENT CONSISTENCY CERTIFICATION

INITIAL EXPLORATION PLAN

EWING BANK BLOCK 877 & 921

OCS- G 35295, OCS-G-36704, & OCS-G-36876 LEASES

The proposed activities described in detail in the enclosed Initial Exploration Plan comply with Louisiana's approved Coastal Zone Management Program and will be conducted in a manner consistent with such Program.

By: **LLOG Exploration Offshore, L.L.C., Operator**

Signed by: Kim DeSopo

Kim DeSopo, Certifying Official

Date: **November 2, 2022**

APPENDIX P
ENVIRONMENTAL IMPACT ANALYSIS
(30 CFR PART 550.227 AND 550.261)

LLOG Exploration Offshore, L.L.C. (LLOG)

Initial Exploration Plan
Ewing Bank Block 877 / 921
OCS-G 35295, OCS-G-36704, & OCS-G-36876

(A) Impact Producing Factors

ENVIRONMENTAL IMPACT ANALYSIS WORKSHEET

Environment Resources	Impact Producing Factors (IPFs) Categories and Examples Refer to recent GOM OCS Lease Sale EIS for a more complete list of IPFs					
	Emissions (air, noise, light, etc.)	**Effluents (muds, cutting, other discharges to the water column or seafloor)**	**Physical disturbances to the seafloor (rig or anchor emplacements, etc.)**	**Wastes sent to shore for treatment or disposal**	**Accidents (e.g., oil spills, chemical spills, H_2S releases)**	**Discarded Trash & Debris**
Site-specific at Offshore Location						
Designated topographic features		(1)	(1)		(1)	
Pinnacle Trend area live bottoms		(2)	(2)		(2)	
Eastern Gulf live bottoms		(3)	(3)		(3)	
Benthic communities			(4)			
Water quality		X			X	
Fisheries		X			X	
Marine Mammals	X(8)	X			X(8)	X
Sea Turtles	X(8)	X			X(8)	X
Air quality	X(9)					
Shipwreck sites (known or potential)			(7)			
Prehistoric archaeological sites			(7)			
Vicinity of Offshore Location						
Essential fish habitat		X			X(6)	
Marine and pelagic birds					X	X
Public health and safety					(5)	
Coastal and Onshore						
Beaches					X(6)	X
Wetlands					X(6)	
Shore birds and coastal nesting birds					X6)	
Coastal wildlife refuges						
Wilderness areas						

Footnotes for Environmental Impact Analysis Matrix

1) Activities that may affect a marine sanctuary or topographic feature. Specifically, if the well or platform site or any anchors will be on the seafloor within the:
   - 4-mile zone of the Flower Garden Banks, or the 3-mile zone of Stetson Bank;
   - 1000-m, 1-mile or 3-mile zone of any topographic feature (submarine bank) protected by the Topographic Features Stipulation attached to an OCS lease;
   - Essential Fish Habitat (EFH) criteria of 500 ft. from any no-activity zone; or
   - Proximity of any submarine bank (500 ft. buffer zone) with relief greater than 2 meters that is not protected by the Topographic Features Stipulation attached to an OCS lease.
2) Activities with any bottom disturbance within an OCS lease block protected through the Live Bottom (Pinnacle Trend) Stipulation attached to an OCS lease.
3) Activities within any Eastern Gulf OCS block where seafloor habitats are protected by the Live Bottom (Low-Relief) Stipulation attached to an OCS lease.
4) Activities on blocks designated by the BOEM as being in water depths 300 meters or greater.
5) Exploration or production activities where H2S concentrations greater than 500 ppm might be encountered.
6) All activities that could result in an accidental spill of produced liquid hydrocarbons or diesel fuel that you determine would impact these environmental resources. If the proposed action is located a sufficient distance from a resource that no impact would occur, the EIA can note that in a sentence or two.
7) All activities that involve seafloor disturbances, including anchor emplacements, in any OCS block designated by the BOEM as having high-probability for the occurrence of shipwrecks or prehistoric sites, including such blocks that will be affected that are adjacent to the lease block in which your planned activity will occur. If the proposed activities are located a sufficient distance from a shipwreck or a prehistoric site that no impact would occur, the EIA can note that in a sentence or two.
8) All activities that you determine might have an adverse effect on endangered or threatened marine mammals or sea turtles or their critical habitats.
9) Production activities that involve transportation of produced fluids to shore using shuttle tankers or barges.

(B) Analysis

TABLE 1: THREATENED AND ENDANGERED SPECIES, CRITICAL HABITAT, AND MARINE MAMMAL INFORMATION

The federally listed endangered and threatened species potentially occurring in the lease area and along the Gulf Coast are provided in the table below:

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico	Gulf of Mexico Range
			Lease Area	Coastal		
Marine Mammals						
Manatee, West Indian	*Trichechus manatus latirostris*	T	--	X	Florida (peninsular)	Coastal Louisiana, Mississippi, Alabama, and Florida
Whale, Blue	*Balaenoptera masculus*	E	X*	--	None	GOM
Whale, Bryde's	*Balaenoptera edeni*	E	X	--	None	Eastern GOM
Whale, Fin	*Balaenoptera physalus*	E	X*	--	None	GOM
Whale, Humpback	*Megaptera novaeangliae*	E	X*	--	None	GOM
Whale, North Atlantic Right	*Eubalaena glacialis*	E	X*	--	None	GOM
Whale, Sei	*Balaenopiera borealis*	E	X*	--	None	GOM
Whale, Sperm	*Physeter catodon (=macrocephalus)*	E	X	--	None	GOM
Terrestrial Mammals						
Mouse, Beach (Alabama, Choctawatchee, Perdido Key, St. Andrew)	*Peromyscus polionotus*	E	-	X	Alabama, Florida (panhandle) beaches	Alabama, Florida (panhandle) beaches
Birds						
Plover, Piping	*Charadrius melodus*	T	-	X	Coastal Texas, Louisiana, Mississippi, Alabama and Florida (panhandle)	Coastal GOM
Crane, Whooping	*Grus Americana*	E	-	X	Coastal Texas	Coastal Texas and Louisiana
Mississippi sandhill crane	*Grus canadensis pulla*	E	-	X	Coastal Mississippi	Coastal Mississippi
Eskimo curlew	*Numenius borealis*	E	-	X	none	Coastal Texas
Northern Aplomado Falcon	*Falco femoralis septentrionalis*	E	-	X	none	Coastal Texas
Red knot	*Calidris canutus rufa*	T	-	X	None	Coastal GOM

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico	Gulf of Mexico Range
			Lease Area	Coastal		
Wood stork	*Mycteria americana*	T	-	X	None	Coastal Alabama and Florida
Reptiles						
Sea Turtle, Green	*Chelonia mydas*	T	X	X	None	GOM
Sea Turtle, Hawksbill	*Eretmochelys imbricata*	E	X	X	None	GOM
Sea Turtle, Kemp's Ridley	*Lepidochelys kempli*	E	X	X	None	GOM
Sea Turtle, Leatherback	*Dermochelys coriacea*	E	X	X	None	GOM
Sea Turtle, Loggerhead	*Caretta caretta*	T	X	X	Texas, Louisiana, Mississippi, Alabama, Florida	GOM
Fish						
Sturgeon, Gulf	*Acipenser oxyrinchus (=oxyrhynchus) desotoi*	T	X	X	Coastal Louisiana, Mississippi, Alabama and Florida (panhandle)	Coastal Louisiana, Mississippi, Alabama and Florida (panhandle)
Oceanic Whitetip Shark	Carcharhinus longimanus	E	X	_	None	GOM
Smalltooth Sawfish	Pristis pectinata	E	-	X	None	Florida
Nassau Grouper	Epinephelus striatus	T	-	X	None	Florida
Giant Manta Ray	Manta birostris	E	X	--	None	GOM
Corals						
Coral, Elkhorn	*Acopora palmate*	T	X**	X	Florida Keys and Dry Tortugas	Flower Garden Banks, Florida, and the Caribbean
Coral, Staghorn	*Acopora cervicornis*	T	-	X	Florida	Flower Garden Banks, Florida, and the Caribbean
Boulder Star Coral	*Orbicella franksi*	T	X	X	none	Flower Garden Banks and Florida
Lobed Star Coral	*Orbicella annularis*	T	X	X	None	Flower Garden Banks and Caribbean
Mountainous Star Coral	*Orbicella faveolata*	T	X	X	None	Flower Garden Banks and Gulf of Mexico
Rough Cactus Coral	*Mycetophyllia ferox*	T	-	X	None	Florida and Southern Gulf of Mexico

Abbreviations: E = Endangered; T = Threatened

* The Blue, Fin, Humpback, North Atlantic Right, and Sei Whales are rare or extralimital in the Gulf of Mexico and are unlikely to be present in the lease area.

** According to the 2017 EIS, Elkhorn Coral, while uncommon, has been found in the Flower Garden Banks. (BOEM 2017-009)

Site-Specific at Ewing Bank Block 877
Proposed operations consist of the drilling and completion of one location in Ewing Bank Block 877 with a Bottom Hole Location of Ewing Bank 921. There are no seismic surveys, pile driving activities, or pipelines making landfall associated with the operations covered by this Plan.

The operations will be conducted with a drillship.

1. Designated Topographic Features
Potential IPFs on topographic features include effluents, and accidents.

Effluents: Ewing Bank Block 877 is 42.2 miles from the closest designated Topographic Features Stipulation Block (Diaphus Bank); therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5**, Water Quality). Oil spills cause damage to benthic organisms only if the oil contacts the organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on corals. Because the crests of topographic features in the Northern Gulf of Mexico are found below 10 m, no oil from a surface spill could reach their sessile biota. Oil from a subsurface spill is not applicable due to the distance of these blocks from a topographic area. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, physical disturbances to the seafloor and wastes sent to shore for disposal) from the proposed activities which could impact topographic features.

2. Pinnacle Trend Area Live Bottoms
Potential IPFs on pinnacle trend area live bottoms include effluents and accidents.

Effluents: Ewing Bank Block 877 is 120.8 miles from the closest live bottom (pinnacle trend) area; therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5**, Water Quality). Oil spills have the potential to foul benthic communities and cause lethal and sublethal effects on live bottom organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on marine organisms. Oil from a subsurface spill is not applicable due to the distance of these blocks from a live bottom

(pinnacle trend) area. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, physical disturbances to the seafloor and wastes sent to shore for disposal) from the proposed activities which could impact a live bottom (pinnacle trend) area.

3. Eastern Gulf Live Bottoms

Potential IPFs on Eastern Gulf live bottoms include effluents and accidents.

Effluents: Ewing Bank Block 877 is not located in an area characterized by the existence of live bottoms; therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5**, Water Quality). Oil spills cause damage to live bottom organisms only if the oil contacts the organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on marine invertebrates. Oil from a subsurface spill is not applicable due to the distance of these blocks from a live bottom area. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, physical disturbances to the seafloor and wastes sent to shore for disposal) from the proposed activities which could impact an Eastern Gulf live bottom area.

4. Benthic Communities

There are no IPFs (including emissions, physical disturbances to the seafloor, wastes sent to shore for disposal, or accidents) from the proposed activities that could cause impacts to benthic communities.

Ewing Bank Block 877 is located in water depths of 984 feet (300 meters) or greater. At such depth high-density benthic communities may sometimes be found. A drillship is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed.

Ewing Bank Block 877 is approximately 7.7 miles from a known benthic community site (Ewing Bank Block 1010) listed in NTL 2009-G40. Benthic communities could potentially be subject to detrimental effects from a catastrophic seafloor blowout due to sediment and oiled sediment from the initial event (BOEM 2017-007). This is unlikely due to the distancing requirements described in NTL 2009-G40; also, the potential impacts would be localized due to the directional movement of oil plumes by water currents and the scattered, patchy distribution of sensitive

habitats. Although widely dispersed, biodegraded particles of a passing oil plume might impact patchy habitats but no significant impacts would be expected to the Gulfwide population. Impacts may be expected if a spill were to occur close to a deepwater benthic habitat; however, beyond the localized area of impact particles would become increasingly biodegraded and dispersed. Localized impacts to deepwater benthic organisms would be expected to be mostly sublethal (BOEM 2017-007). LLOG's proposed operations in Ewing Bank Block 877 should not cause significant impacts to benthic communities.

5. Water Quality

IPFs that could result in water quality degradation from the proposed operations in Ewing Bank Block 877 include effluents and accidents.

Effluents: Levels of contaminants in drilling muds and cuttings and produced water discharges, discharge-rate restrictions and monitoring and toxicity testing are regulated by the EPA NPDES permit, thereby eliminating many significant biological or ecological effects. Operational discharges are not expected to cause significant adverse impacts to water quality. Additionally, an analysis of the best available information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico (NMFS, 2020) concludes that exposures to toxicants in discharges from oil and gas activities are not likely to adversely affect ESA-listed species.

Accidents: Impact-producing factors for OCS oil- and gas-related accidental events primarily involve drilling fluid spills, chemical and waste spills, and oil spills.

Drilling Fluid Spills: Water-based fluid (WBF) and Synthetic-based fluid (SBF) spills may result in elevated turbidity, which would be short term, localized, and reversible. The WBF is normally discharged to the seafloor during riserless drilling, which is allowable due to its low toxicity. For the same reasons, a spill of WBF should have negligible impacts. The SBF has low toxicity and the discharge of SBF is allowed to the extent that it adheres onto drill cuttings. Both USEPA Regions 4 and 6 permit the discharge of cuttings wetted with SBF as long as the retained SBF amount is below a prescribed percent, meets biodegradation and toxicity requirements, and is not contaminated with the formation oil or PAH. A spill of SBF may cause a temporary increase in biological oxygen demand and locally result in lowered dissolved oxygen in the water column, as well as potentially producing an oil sheen if formation oil is present in the fluid. The impacts from a release of SBF are considered to be minor. Spills of SBF typically do not require mitigation because SBF sinks in water and naturally biodegrades, seafloor cleanup is technically difficult, and SBF has low toxicity. (BOEM 2017-009)

Chemical Spills: Accidental chemical spills could result in temporary localized impacts on water quality primarily due to changing pH levels. Chemicals spills are generally a small volume compared with spills of oil and drilling fluids. During the period of 2007 to 2014, small

chemical spills occurred at an average annual volume of 28 bbl, while large chemical spills occurred at an average annual volume of 758 bbl. These chemical spills normally dissolve in water and dissipate quickly through dilution with no observable effects. Also, many of these chemicals are approved to be commingled in produced water for discharge into the ocean, which is a permitted activity. Therefore, impacts from chemical spills are considered to be minor and do not typically require mitigation because of technical feasibility and low toxicity after dilution (BOEM 2017-009).

Oil Spills: Oil spills have the greatest potential of all OCS oil-and gas-related activities to affect water quality. Small spills (<1,000 bbl) are not expected to substantially impact water quality in coastal or offshore waters because the oil dissipates quickly through dispersion and weathering while still at sea. Reasonably foreseeable larger spills (≥1,000 bbl), however, could impact water quality in coastal and offshore waters (BOEM 2017-007). Based on data provided in the BOEM 2016 Update of Occurrence Rates for Offshore Oil Spills, it is unlikely that an accidental surface or subsurface spill of a significant volume would occur from the proposed activities. Between 2001 and 2015 OCS operations produced 8 billion barrels of oil and spilled 0.062 percent of this oil, or 1 barrel for every 1,624 barrels produced, with the overall spill volume was almost entirely accounted for by the 2010 Deepwater Horizon blowout and subsequent discharge of 4.9 million barrels of oil. Additional information on unlikely scenarios and impacts from very large oil spills are discussed in the Catastrophic Spill Event Analysis white paper (BOEM 2017-007).

If a spill were to occur, the water quality of marine waters would be temporarily affected by the dissolved components and small oil droplets. Dispersion by currents and microbial degradation would remove the oil from the water column and dilute the constituents to background levels. Historically, changes in offshore water quality from oil spills have only been detected during the life of the spill and up to several months afterwards. Most of the components of oil are insoluble in water and therefore float. Mitigation efforts for oil spills include booming, burning, and the use of dispersants (BOEM 2017-009). These methods may cause short-term secondary impacts to water quality, such as the introduction of additional hydrocarbon into the dissolved phase through the use of dispersants and the sinking of hydrocarbon residuals from burning. Since burning and the use of dispersants introduce additional hydrocarbons into the dissolved phase, impacts to water quality after mitigation efforts are considered to be moderate because dissolved hydrocarbons extend down into the water column. This could also result in additional exposure pathways via ingestion and gill respiration and may result in acute or chronic effects to marine life (BOEM 2017-009). Dispersants and burning will only be used as response options if approved by the Regional Response Team in coordination with applicable RRT Dispersant and In situ Burn Plans.

The activities proposed in this plan will be covered by LLOG's Regional Oil Spill Response Plan, which discusses potential response actions in greater detail (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, physical disturbances to the seafloor, and wastes sent to shore for disposal) from the proposed activities which could cause impacts to water quality.

6. Fisheries

There are multiple species of fish in the Gulf of Mexico, including the endangered and threatened species listed in Table 1 at the beginning of this Environmental Impact Assessment. More information regarding the endangered Gulf Sturgeon can be found in Item 20.2. IPFs that could cause impacts to fisheries as a result of the proposed operations in Ewing Bank Block 877 include effluents and accidents.

Effluents: Effluents such as drilling fluids and cuttings discharges contain components and properties which are detrimental to fishery resources. Moderate petroleum and metal contamination of sediments and the water column can occur out to several hundred meters down-current from the discharge point. Offshore discharges are expected to disperse and dilute to very near background levels in the water column or on the seafloor within 3,000 m of the discharge point, and are expected to have negligible effect on fisheries. Additionally, an analysis of the best available information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico (NMFS, 2020) concludes that exposures to toxicants in discharges from oil and gas activities are not likely to adversely affect ESA-listed species.

Accidents: An accidental oil spill has the potential to cause some detrimental effects on fisheries; however, it is unlikely that such an event would occur from the proposed activities (refer to **Item 5**, Water Quality). The effects of oil on mobile adult finfish or shellfish would likely be sublethal and the extent of damage would be reduced to the capacity of adult fish and shellfish to avoid the spill, to metabolize hydrocarbons, and to excrete both metabolites and parent compounds. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

There are no IPFs from emissions, physical disturbances to the seafloor or wastes sent to shore for disposal from the proposed activities which could cause impacts to fisheries.

7. Marine Mammals

The latest population estimates for the Gulf of Mexico revealed that cetaceans located in the continental shelf and shelf-edge were almost exclusively bottlenose dolphin and Atlantic spotted dolphin. Squid eaters, including dwarf and pygmy killer whale, Risso's dolphin, rough-toothed dolphin, and Cuvier's beaked whale, occurred most frequently along the upper slope in areas outside of anticyclones. The Bryde's whale is the only commonly occurring baleen whale in the northern Gulf of Mexico and has been sighted off western Florida and in the De Soto Canyon region. Florida manatees have been sighted along the entire northern GOM but are mainly found in the shallow coastal waters of Florida, which are unassociated with the proposed actions. A

complete list of all endangered and threatened marine mammals in the GOM may be found in **Table 1** at the beginning of this Environmental Impact Assessment. More information regarding the endangered Gulf of Mexico Bryde's whale can be found in **Item 20.1**. IPFs that could cause impacts to marine mammals as a result of the proposed operations in Ewing Bank Block 877 include emissions, effluents, discarded trash and debris, and accidents.

Emissions: Noises from drilling activities, support vessels and helicopters may elicit a startle reaction from marine mammals. This reaction may lead to disruption of marine mammals' normal activities. Stress may make them more vulnerable to parasites, disease, environmental contaminants, and/or predation (Majors and Myrick, 1990). There is little conclusive evidence for long-term displacements and population trends for marine mammals relative to noise.

Effluents: Drilling fluids and cuttings discharges contain components which may be detrimental to marine mammals. Most operational discharges are diluted and dispersed upon release. Any potential impact from drilling fluids would be indirect, either as a result of impacts on prey items or possibly through ingestion in the food chain (API, 1989).

Discarded trash and debris: Both entanglement in, and ingestion of debris have caused the death or serious injury of marine mammals (Laist, 1997; MMC, 1999). The limited amount of marine debris, if any, resulting from the proposed activities is not expected to substantially harm marine mammals. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease

operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

Accidents: Collisions between support vessels and marine mammals, including cetaceans, would be unusual events, however, should one occur, death or injury to marine mammals is possible. Contract vessel operators can avoid marine mammals and reduce potential deaths by maintaining a vigilant watch for marine mammals and maintaining a safe distance of 91 meters or greater from whales and a distance of 45 meters or greater from small cetaceans. When assemblages of cetaceans are observed vessel speeds will be reduced to 10 knots or less. Vessel personnel should use a Gulf of Mexico reference guide to help identify the twenty-one species of whales and dolphins, and the single species of manatee that may be encountered in the Gulf of Mexico OCS.

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion, BOEM NTL 2016-G01 "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting" and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

Vessel personnel must report sightings of any injured or dead protected marine mammal species immediately, regardless of whether the injury or death is caused by their vessel, to the NMFS Southeast Marine Mammal Stranding Hotline at (877) WHALE-HELP (877-942-5343). Additional information may be found at the following website: https://www.fisheries.noaa.gov/report. Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool), or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

These proposed operations may utilize a moon pool(s) to conduct various subsea activities. LLOG's contractor or company representative will conduct regular visual inspections of the moon pool area, along with remote CCTV monitoring, to detect the presence of marine mammals. If any marine mammal is detected in the moon pool, LLOG will cease operations and contact NMFS at nmfs.psoreview@noaa.gov and BSEE at protectedspecies@bsee.gov and 985-722-7902 for additional guidance and incidental report information.

Oil spills have the potential to cause sublethal oil-related injuries and spill-related deaths to marine mammals. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Oil spill response activities may increase

vessel traffic in the area, which could add to changes in cetacean behavior and/or distribution, thereby causing additional stress to the animals. The activities proposed in this plan will be covered by LLOG's OSRP (refer to information submitted in accordance with **Appendix H**).

The NMFS Office of Protected Resources coordinates agency assessment of the need for response and leads response efforts for spills that may impact cetaceans. If a spill may impact cetaceans, NMFS Protected Resources Contacts should be notified (see contact details below), and they will initiate notification of other relevant parties.

NMFS Protected Resources Contacts for the Gulf of Mexico:

- Marine mammals – Southeast emergency stranding hotline 1-877-433-8299
- Other endangered or threatened species – ESA Section 7 consulting biologist: nmfs.ser.emergency.consult@noaa.gov

There are no other IPFs (including physical disturbances to the seafloor) from the proposed activities which could impact marine mammals.

8. Sea Turtles

The latest population estimates for the Gulf of Mexico sighted most loggerhead, Kemp's ridley and leatherback sea turtles over shelf waters. Historically these species have been sighted up to the shelf's edge. They appear to be more abundant east of the Mississippi River than they are west of the river (Fritts et al., 1983b; Lohoefener et al., 1990). Deep waters may be used by all species as a transitory habitat. A complete list of endangered and threatened sea turtles in the GOM may be found in **Table 1** at the beginning of this Environmental Impact Assessment. Additional details regarding the loggerhead sea turtle's critical habitat in the GOM are located in **Item 20.3**. IPFs that could cause impacts to sea turtles as a result of the proposed operations include emissions, effluents, discarded trash and debris, and accidents.

Emissions: Noise from drilling activities, support vessels, and helicopters may elicit a startle reaction from sea turtles, but this is a temporary disturbance. As a result, sound sources associated with support vessel movement as part of the proposed operations are insignificant and therefore are not likely to adversely affect sea turtles.

Effluents: Drilling fluids and cuttings discharges are not known to be lethal to sea turtles. Most operational discharges are diluted and dispersed upon release. Any potential impact from drilling fluids would be indirect, either as a result of impacts on prey items or possibly through ingestion in the food chain (API, 1989).

Discarded trash and debris: Both entanglement in, and ingestion of, debris have caused the death or serious injury of sea turtles (Balazs, 1985). The limited amount of marine debris, if any, resulting from the proposed activities is not expected to substantially harm sea turtles. Operators

are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

Accidents: Collisions between support vessels and sea turtles would be unusual events, however should one occur, death or injury to sea turtles is possible. Contract vessel operators can avoid sea turtles and reduce potential deaths by maintaining a vigilant watch for sea turtles and maintaining a safe distance of 45 meters or greater when they are sighted. Vessel crews should use a reference guide to help identify the five species of sea turtles that may be encountered in the Gulf of Mexico OCS. Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion, BOEM NTL 2016-G01 "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting" and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

Vessel crews must report sightings of any injured or dead protected sea turtle species immediately, regardless of whether the injury or death is caused by their vessel, to the State Coordinators for the Sea Turtle Stranding and Salvage Network (STSSN) at http://www.sefsc.noaa.gov/species/turtles/stranding_coordinators.htm (phone numbers vary by state). Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with the operator's vessel, an entrapment within the operator's equipment or vessel (e.g. moon pool),

or an entanglement within the operator's equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

These proposed operations may utilize a moon pool(s) to conduct various subsea activities. LLOG's contractor or company representative will conduct regular visual inspections of the moon pool area, along with remote CCTV monitoring, to detect the presence of marine mammals. If any marine mammal is detected in the moon pool, LLOG will cease operations and contact NMFS at nmfs.psoreview@noaa.gov and BSEE at protectedspecies@bsee.gov and 985-722-7902 for additional guidance and incidental report information. If there are any entrapped or entangled sea turtles, the following procedures will be followed in accordance with Appendix J of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion:

Any sea turtles taken incidentally during the course of fishing or scientific research activities must be handled with due care to prevent injury to live specimens, observed for activity, and returned to the water according to the following procedures.

Sea turtles that are actively moving or determined to be dead (as described below) must be released over the stern of the boat. In addition, they must be released only when fishing or scientific collection gear is not in use, when the engine gears are in neutral position, and in areas where they are unlikely to be recaptured or injured by vessels. Resuscitation must be attempted on sea turtles that are comatose or inactive by:

- Placing the turtle on its bottom shell (plastron) so that the turtle is right side up and elevating its hindquarters at least 6 inches (15.2 cm) for a period of 4 to 24 hours. The amount of elevation depends on the size of the turtle; greater elevations are needed for larger turtles. Periodically, rock the turtle gently left to right and right to left by holding the outer edge of the shell (carapace) and lifting one side about 3 inches (7.6 cm) then alternate to the other side. Gently touch the eye and pinch the tail (reflex test) periodically to see if there is a response.
- Sea turtles being resuscitated must be shaded and kept damp or moist but under no circumstance be placed into a container holding water. A water- soaked towel placed over the head, carapace, and flippers is the most effective method in keeping a turtle moist.
- Sea turtles that revive and become active must be released over the stern of the boat only when fishing or scientific collection gear is not in use, when the engine gears are in neutral position, and in areas where they are unlikely to be recaptured or injured by vessels. Sea turtles that fail to respond to the reflex test or fail to move within 4 hours (up to 24, if possible) must be returned to the water in the same manner as that for actively moving turtles.

- A turtle is determined to be dead if the muscles are stiff (rigor mortis) and/or the flesh has begun to rot; otherwise, the turtle is determined to be comatose or inactive and resuscitation attempts are necessary.

Any sea turtle so taken must not be consumed, sold, landed, offloaded, transshipped, or kept below deck.

All sea turtle species and their life stages are vulnerable to the harmful effects of oil through direct contact or by fouling of their food. Exposure to oil can be fatal, particularly to juveniles and hatchlings. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Oil spill response activities may increase vessel traffic in the area, which could add to the possibility of collisions with sea turtles. The activities proposed in this plan will be covered by LLOG's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix H**).

The NMFS Office of Protected Resources coordinates agency assessment of the need for response and leads response efforts for spills that may impact sea turtles. If a spill may impact sea turtles, the following NMFS Protected Resources Contacts should be notified, and they will initiate notification of other relevant parties.

- Dr. Brian Stacy at brian.stacy@noaa.gov and 352-283-3370 (cell); or
- Stacy Hargrove at stacy.hargrove@noaa.gov and 305-781-7453 (cell)

There are no other IPFs (including physical disturbances to the seafloor) from the proposed activities which could impact sea turtles.

9. Air Quality

Ewing Bank Block 877 is located 105 miles from the Breton Wilderness Area and 67 miles from shore. Applicable emissions data is included in **Appendix G** of the Plan.

There would be a limited degree of air quality degradation in the immediate vicinity of the proposed activities. Plan Emissions for the proposed activities do not exceed the annual exemption levels as set forth by BOEM. Accidents and blowouts can release hydrocarbons or chemicals, which could cause the emission of air pollutants. However, these releases would not impact onshore air quality because of the prevailing atmospheric conditions, emission height, emission rates, and the distance of Ewing Bank Block 877 from the coastline. There are no other IPFs (including effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal) from the proposed activities which would impact air quality.

10. Shipwreck Sites (known or potential)

Potential IPFs that could impact known or unknown shipwreck sites as a result of the proposed operations in Ewing Bank Block 877 include disturbances to the seafloor.

Physical disturbances to the seafloor: A drillship is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed. Because physical disturbances to the seafloor will be minimized by the use of a drillship, LLOG's proposed operations in Ewing Bank Block 877 would not cause impacts to shipwreck sites.

Additionally, Ewing Bank Block 877 is not located in or adjacent to an OCS block designated by BOEM as having a high probability for occurrence of shipwrecks, therefore, no adverse impacts are expected.

There are no other IPFs (including emissions, effluents, wastes sent to shore for treatment or disposal, or accidents) from the proposed activities that could cause impacts to shipwreck sites.

11. Prehistoric Archaeological Sites

IPFs that could cause impacts to prehistoric archaeological sites as a result of the proposed operations in Ewing Bank Block 877 are physical disturbances to the seafloor and accidents (oil spills).

Physical Disturbances to the seafloor: Although the operations proposed will be conducted by utilizing a drillship, which would cause only an insignificant amount of seafloor to be disturbed, Ewing Bank Block 877 is located inside the Archaeological Prehistoric high probability lines. LLOG will report to BOEM the discovery of any object of prehistoric archaeological significance and make every reasonable effort to preserve and protect that cultural resource.

Accidents: An accidental oil spill has the potential to cause some detrimental effects to prehistoric archaeological sites if the release were to occur subsea. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by LLOG's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix H**).

There are no other IPFs (including emissions, effluents or wastes sent to shore for treatment or disposal) from the proposed activities which could impact prehistoric archeological sites.

Vicinity of Offshore Location

12. Essential Fish Habitat (EFH)

IPFs that could cause impacts to EFH as a result of the proposed operations in Ewing Bank Block 877 include effluents and accidents. EFH includes all estuarine and marine waters and substrates in the Gulf of Mexico.

Effluents: The Live Bottom Low Relief Stipulation, the Live Bottom (Pinnacle Trend) Stipulation, and the Eastern Gulf Pinnacle Trend Stipulation would prevent most of the potential

impacts on live-bottom communities and EFH from operational waste discharges. Levels of contaminants in drilling muds and cuttings and produced-water discharges, discharge-rate restrictions, and monitoring and toxicity testing are regulated by the EPA NPDES permit, thereby eliminating many significant biological or ecological effects. Operational discharges are not expected to cause significant adverse impacts to EFH.

Accidents: An accidental oil spill has the potential to cause some detrimental effects on EFH. Oil spills that contact coastal bays and estuaries, as well as OCS waters when pelagic eggs and larvae are present, have the greatest potential to affect fisheries. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, physical disturbances to the seafloor and wastes sent to shore for treatment or disposal) from the proposed activities which could impact essential fish habitat.

13. Marine and Pelagic Birds

IPFs that could impact marine birds as a result of the proposed activities include air emissions, accidental oil spills, and discarded trash and debris from vessels and the facilities.

Emissions: Emissions of pollutants into the atmosphere from these activities are far below concentrations which could harm coastal and marine birds.

Accidents: An oil spill would cause localized, low-level petroleum hydrocarbon contamination. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Marine and pelagic birds feeding at the spill location may experience chronic, nonfatal, physiological stress. It is expected that few, if any, coastal and marine birds would actually be affected to that extent. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Marine and pelagic birds could become entangled and snared in discarded trash and debris, or ingest small plastic debris, which can cause permanent injuries and death. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins

to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE. Debris, if any, from these proposed activities will seldom interact with marine and pelagic birds; therefore, the effects will be negligible.

There are no other IPFs (including effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact marine and pelagic birds.

14. Public Health and Safety Due to Accidents.
There are no IPFs (emissions, effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal or accidents, including an accidental H_2S release) from the proposed activities which could cause impacts to public health and safety. In accordance with NTL No.'s 2008-G04, 2009-G27, and 2009-G31, sufficient information is included in **Appendix D** to justify our request that our proposed activities be classified by BSEE as H_2S absent.

Coastal and Onshore

15. Beaches
IPFs from the proposed activities that could cause impacts to beaches include accidents (oil spills) and discarded trash and debris.

Accidents: Oil spills contacting beaches would have impacts on the use of recreational beaches and associated resources. Due to the distance from shore (67 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Trash on the beach is recognized as a major threat to the enjoyment and use of beaches. There will only be a limited amount of marine debris, if any, resulting from the proposed activities. Operators are prohibited from deliberately discharging

debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact beaches.

16. Wetlands

IPFs from the proposed activities that could cause impacts to wetlands include accidents (oil spills) and discarded trash and debris.

Accidents: It is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Due to the distance from shore (67 miles) and the response capabilities that would be implemented, no impacts are expected. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: There will only be a limited amount of marine debris, if any, resulting from the proposed activities. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact wetlands.

17. Shore Birds and Coastal Nesting Birds

Accidents: Oil spills could cause impacts to shore birds and coastal nesting birds. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Given the distance from shore (67 miles) and the response capabilities that would be implemented, no impacts are expected. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Coastal and marine birds are highly susceptible to entanglement in floating, submerged, and beached marine debris: specifically plastics. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable,

environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to shore birds and coastal nesting birds.

18. Coastal Wildlife Refuges

Accidents: An accidental oil spill from the proposed activities could cause impacts to coastal wildlife refuges. However, it is unlikely that an oil spill would occur from the proposed activities (refer to Item 5, Water Quality). Due to the distance from shore (67 miles) and the response capabilities that would be implemented, no impacts are expected. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V, the Marine Plastic Pollution Research and Control Act and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be

indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to coastal wildlife refuges.

19. Wilderness Areas

Accidents: An accidental oil spill from the proposed activities could cause impacts to wilderness areas. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Due to the distance from the nearest designated Wilderness Area (105 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H).**

Discarded trash and debris: Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V, the Marine Plastic Pollution Research and Control Act and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to wilderness areas.

20. Other Environmental Resources Identified

20.1 – Bryde's Whale

The Bryde's whale is the only commonly occurring baleen whale in the northern Gulf of Mexico and has been sighted off western Florida and in the De Soto Canyon region. The Bryde's whale area is over 185 miles from the proposed operations. Additionally, vessel traffic associated with the proposed operations will not flow through the Bryde's whale area. Therefore, there are no IPFs from the proposed activities which should impact the Bryde's whale.

20.2 – Gulf Sturgeon

The gulf sturgeon resides primarily in inland estuaries and rivers from Louisiana to Florida and a small population of the species enters the Gulf of Mexico seasonally in western Florida. IPFs from the proposed activities that could cause impacts to the gulf sturgeon include accidents (oil spills) and discarded trash and debris.

Accidents: Due to the distance from the nearest identified gulf sturgeon critical habitat (123.4 miles) and the response capabilities that would be implemented during a spill, no significant adverse impacts are expected to the gulf sturgeon. Considering the information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, the location of this critical habitat in relation to proposed operations, the likely dilution of oil reaching nearshore areas, and the on-going weathering and dispersal of oil over time, we do not anticipate the effects from oil spills will appreciably diminish the value of gulf sturgeon designated critical habitat for the conservation of the species. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Section 8)**.

Discarded trash and debris: Trash and debris are not expected to impact the gulf sturgeon. There will only be a limited amount of marine debris, if any, resulting from the proposed activities. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable,

environmentally persistent materials such as plastic or glass. LLOG will also collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact the gulf sturgeon.

20.3 – Loggerhead Sea Turtle

The loggerhead sea turtles are large sea turtles that inhabit continental shelf and estuarine environments throughout the temperate and tropical regions of the Atlantic Ocean, with nesting beaches along the northern and western Gulf of Mexico. NMFS issued a Final Rule in 2014 (79 FR 39855) designating a critical habitat including 38 marine areas within the Northwest Atlantic Ocean, with seven of those areas residing within the Gulf of Mexico. These areas contain one or a combination of habitat types: nearshore reproductive habitats, winter areas, breeding areas, constricted migratory corridors, and/or *Sargassum* habitats.

There are multiple IPFs that may impact loggerhead sea turtles (see **Item 8**). However, the closest loggerhead critical habitat is located 165.4 miles from Ewing Bank Block 877; therefore, no adverse impacts are expected to the critical habitat. Additionally, considering the information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, we do not expect proposed operations to affect Sargassum's ability to support adequate prey abundance and cover for loggerhead turtles.

20.4 - Protected Corals

Protected coral habitats in the Gulf of Mexico range from Florida, the Flower Garden Banks National Marine Sanctuary, and into the Caribbean, including Puerto Rico, the U.S. Virgin Islands, and Navassa Island. Four counties in Florida (Palm Beach, Broward, Miami-Dade, and Monroe Counties) were designated as critical habitats for elkhorn (Acropora palmata) and staghorn (Acropora cervicornis) corals. These coral habitats are located outside of the planning area and are not expected to be impacted by the proposed actions. Elkhorn coral can also be found in the Flower Garden Banks along with three additional coral species, boulder star coral (Orbicella franksi), lobed star coral (Orbicella annularis), and mountainous star coral (Orbicella

faveolatta). IPFs from the proposed activities that could cause impacts to protected corals include accidents (oil spills).

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5**, Water Quality). Oil spills cause damage to corals only if the oil contacts the organisms. Due to the distance from the Flower Garden Banks (218.1 miles) and other critical coral habitats, no adverse impacts are expected. The activities proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Section 8**).

There are no other IPFs (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for disposal) from the proposed activities which could impact protected corals.

20.5 - Endangered Beach Mice

There are four subspecies of endangered beach mouse that are found in the dune systems along parts of Alabama and northwest Florida. Due to the location of Ewing Bank Block 877 and the beach mouse critical habitat (above the intertidal zone), there are no IPFs that could impact endangered beach mice.

20.6 - Navigation

The current system of navigation channels around the northern GOM is believed to be generally adequate to accommodate traffic generated by the future Gulfwide OCS Program. As exploration and development activities increase on deepwater leases in the GOM, port channels may need to be expanded to accommodate vessels with deeper drafts and longer ranges. However, current navigation channels will not be changed, and new channels will not be required as a result of the activities proposed in this plan.

(C) IMPACTS ON PROPOSED ACTIVITIES

The site–specific environmental conditions have been taken into account for the proposed activities. No impacts are expected on the proposed activities from site-specific environmental conditions.

(D) ENVIRONMENTAL HAZARDS

During the hurricane season, June through November, the Gulf of Mexico is impacted by an average of ten tropical storms (39-73 mph winds), of which six become hurricanes (> 74 mph winds). Due to its location in the gulf, Ewing Bank Block 877 may experience hurricane and tropical storm force winds, and related sea currents. These factors can adversely impact the integrity of the operations covered by this plan. A significant storm may present physical hazards to operators and vessels, damage exploration or production equipment, or result in the release of hazardous materials (including hydrocarbons). Additionally, the displacement of equipment may disrupt the local benthic habitat and pose a threat to local species.

The following preventative measures included in this plan may be implemented to mitigate these impacts:

1. Drilling & completion
    a. Secure well
    b. Secure rig / platform
    c. Evacuate personnel

Drilling activities will be conducted in accordance with NTL No.'s 2008-G09, 2009-G10, and 2010-N10.

2. Structure Installation
   Operator will not conduct structure installation operations during Tropical Storm or Hurricane threat.

(E) ALTERNATIVES
No alternatives to the proposed activities were considered to reduce environmental impacts.

(F) MITIGATION MEASURES
No mitigation measures other than those required by regulation will be employed to avoid, diminish, or eliminate potential impacts on environmental resources.

(G) CONSULTATION
No agencies or persons were consulted regarding potential impacts associated with the proposed activities. Therefore, a list of such entities has not been provided.

(H) PREPARER(S)

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Although not cited, the following were utilized in preparing this EIA:

- Hazard Surveys
- BOEM EIS's:
  - GOM Deepwater Operations and Activities. Environmental Assessment. BOEM 2000-001
  - GOM Central and Western Planning Areas Sales 166 and 168 Final Environmental Impact Statement. BOEM 96-0058.

APPENDIX Q
ADMINISTRATIVE INFORMATION
(30 CFR Part 550.228 and 550.262)

A. Exempted Information Description (Public Information Copies only)

Excluded from the Public Information copies are the following:

- Proposed bottom hole location information
- Proposed total well depths (measured and true vertical depth)
- Production Rates and Life of Reserves
- New and Unusual Technologies
- Geological and Geophysical Attachments

B. Bibliography

The following documents were utilized in preparing this Plan:

Document	Author	Dated
Deep Tow Survey 3-D Geohazard Assessment Well Clearance Letter, Location A & B	Tesla Offshore, LLC Gardline Gardline	2015 2016 2016
BOEMRE Environmental Impact Statement Report – No. 2009-053	Bureau of Ocean Energy Management, Regulation, and Enforcement	2009
Regional Oil Spill Response Plan	LLOG Exploration Offshore, L.L.C.	2022