

UNITED STATES GOVERNMENT
MEMORANDUM

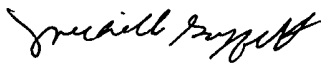
February 25, 2005

To: Public Information (MS 5034)
From: Plan Coordinator, FO, Plans Section (MS 5231)

Subject: Public Information copy of plan
Control # - N-08338
Type - Initial Exploration Plan
Lease(s) - OCS-G19555 Block - 336 Keathley Canyon Area
Operator - BP Exploration & Production Inc.
Description - Wells A, B, and C
Rig Type - DP SEMISUBMERSIBLE

Attached is a copy of the subject plan.

It has been deemed submitted as of this date and is under review for approval.


Michelle Griffitt
Plan Coordinator

Site Type/Name	Botm Lse/Area/Blk	Surface Location	Surf Lse/Area/Blk
WELL/A	G19555/KC/336	813 FNL, 4643 FEL	G19555/KC/336
WELL/B	G19555/KC/336	813 FNL, 4893 FEL	G19555/KC/336
WELL/C	G19555/KC/336	813 FNL, 4393 FEL	G19555/KC/336

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NOTED - SCHEXNAILDRE

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NUF338

Scherie Douglas
North America Exploration
501 WestLake Park Boulevard
Houston, Texas 77079

Telephone: (281) 366-6843
Fax: (281) 366-7556
Scherie.Douglas@bp.com

October 25, 2004

Regional Supervisor
Office of Field Operations
U.S. Department of the Interior
Minerals Management Service
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

Attn: Nick Wetzel

Re: Initial Exploration Plan for Lease OCS-G
19555, Keathley Canyon Block 336



Gentlemen:

In accordance with the provisions of Title 30 CFR 250.204 and that certain Notice to Lessees (NTL 2003-G17), BP Exploration & Production Inc. (BP) hereby submits for your review and approval nine (9) copies of an Exploration Plan for Leases OCS-G 19555 Keathley Canyon Block 336, Offshore, Louisiana. Five (5) copies are "Proprietary Information" and four (4) copies are "Public Information".

Excluded from the Public Information copies are certain geologic discussions, depth of wells and structure maps.

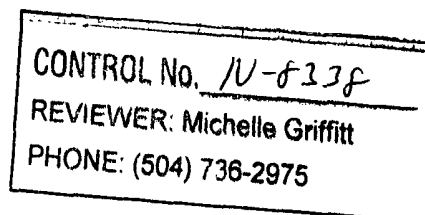
BP anticipates activities will commence under this proposed Exploration Plan on approximately April 15, 2005.

Should you have questions or require further information, please contact me at (281) 366-6843.

Sincerely,

Scherie Douglas
Regulatory Specialist

Attachments





BP EXPLORATION & PRODUCTION, INC.

INITIAL EXPLORATION PLAN

**KEATHLEY CANYON BLOCK 336
OCS-G 19555**

PUBLIC INFORMATION

CONTROL No. <u>N-8338</u>
REVIEWER: Michelle Griffitt
PHONE: (504) 736-2975

February, 2005

SECTION 1.0

CONTENTS OF PLAN

1.1 Description of Proposed Activities

In this Exploration Plan (EP) BP Exploration and Production, Inc. proposes to drill and temporarily abandon three (3) exploratory wells in Keathley Canyon Block 336. Information pertaining to the geological targets, including a narrative of trapping features, is addressed in Section 3 "Geological and Geophysical Information" of this plan. No well testing is proposed.

1.2 Tentative Schedule

Drilling operations as proposed by this plan are scheduled to begin on or about April 15, 2005 subject to approval of this plan and subsequent Applications for a Permit to Drill. BP proposes to conduct the proposed operations as outlined in the activity schedule included in the attached OCS Plan Information Form.

1.3 Location Information

Included as attachments to Section 1 are Form MMS-137 "OCS Plan Information Form", and a well location plat prepared in accordance with NTL 2002-G08.

1.4 Drilling Unit

The proposed wells will be drilled with Transocean's dynamically positioning rig *Deepwater Horizon*. Rig specifications will be made a part of the appropriate Applications for Permit to Drill.

Please note that if the aforementioned semi-submersible drilling rig is not available and another rig is contracted, any differences regarding air emissions, drilling equipment, pollution control and safety equipment will be addressed at that time.

Safety features on the MODU will include well control, pollution prevention, welding procedure, and blowout prevention equipment as described in Title 30 CFR Part 250, Subparts C, D, E, G and O and as further clarified by MMS Notices to Lessees and current policy making invoked by the MMS. The *Deepwater Horizon* is ISO 14001 certified.

The MMS is required to conduct onsite inspections of offshore facilities to confirm operators are complying with lease stipulations, operating regulations, approved plans, and other conditions, as well as to assure safety and pollution prevention requirements are being met. The National Potential Incident of Noncompliance (PINC) List serves as the baseline for these inspections. The MMS also inspects the stockpiles of equipment listed in the operator's approved Regional Oil Spill Response Plan that would be used for the containment and cleanup of hydrocarbon spills.

Appropriate life rafts, life jackets, rig buoys, etc. will be maintained on the facility at all times as mandated by the U.S. Coast Guard regulations contained in Title 33 CFR.

Supervisory and certain designated personnel on-board the facility will be familiar with the effluent limitations and guidelines for overboard discharges into the receiving waters, as outlined in the NPDES General Permit GMG290000.

1.5 Attachments to Section 1.0

- OCS Plan Information Form
- Well Location Maps

OCS PLAN INFORMATION FORM

General Information												
Type of OCS Plan		<input checked="" type="checkbox"/>		Exploration Plan (EP)				Development Operations Coordination Document (DOCD)				
Company Name: BP Exploration & Production, Inc.								MMS Operation Number: 02481				
Address: 501 Westlake Park Blvd Houston, TX 77079								Contact Person: Scherie Douglas				
								Phone Number: 281-366-6843				
								E-Mail Address: scherie.douglas@bp.com				
Lease(s): G 19555				Area: KC		Block(s): 336		Project Name (If Applicable): Kaskida				
Objective(s):		<input checked="" type="checkbox"/>	Oil	<input type="checkbox"/>	Gas	<input type="checkbox"/>	Sulphur	<input type="checkbox"/>	Salt	Onshore Base: Fourchon, LA		Distance to Closes Land (Miles): 191
Description of Proposed Activities (Mark all that apply)												
<input checked="" type="checkbox"/>	Exploration drilling							Development drilling				
<input type="checkbox"/>	Well completion							Installation of production platform				
<input type="checkbox"/>	Well test flaring (for more than 48 hours)							Installation of production facilities				
<input type="checkbox"/>	Installation of caisson or platform as well protection structure							Installation of satellite structure				
<input type="checkbox"/>	Installation of subsea wellheads and/or manifolds							Commence production				
<input type="checkbox"/>	Installation of lease term pipelines							Other (Specify and describe)				
Have you submitted or do you plan to submit a Conservation Information Document to accompany this plan?										Yes	<input checked="" type="checkbox"/>	No
Do you propose to use new or unusual technology to conduct your activities?										Yes	<input checked="" type="checkbox"/>	No
Do you propose any facility that will serve as a host facility for deepwater subsea development?										Yes	<input checked="" type="checkbox"/>	No
Do you propose any activities that may disturb an MMS-designated high-probability archaeological area?										Yes	<input checked="" type="checkbox"/>	No
Have all of the surface locations of your proposed activities been previously reviewed and approved by MMS?										Yes	<input checked="" type="checkbox"/>	No
Tentative Schedule of Proposed Activities												
Proposed Activity								Start Date	End Date	No. of Days		
Drill and temporarily abandon well location "A"								04/15/05	09/21/05	160		
Drill and temporarily abandon well location "B"								01/01/06	06/09/06	160		
Drill and temporarily abandon well location "C"								01/01/07	06/09/07	160		
Description of Drilling Rig								Description of Production Platform				
<input type="checkbox"/>	Jackup		<input type="checkbox"/>	Drillship				<input type="checkbox"/>	Caisson		<input type="checkbox"/>	Tension Leg Platform
<input type="checkbox"/>	Gorilla Jackup		<input type="checkbox"/>	Platform rig				<input type="checkbox"/>	Well protector		<input type="checkbox"/>	Compliant tower
<input checked="" type="checkbox"/>	Semi-submersible		<input type="checkbox"/>	Submersible				<input type="checkbox"/>	Fixed Platform		<input type="checkbox"/>	Guyed tower
<input type="checkbox"/>	DP Semi-submersible		<input type="checkbox"/>	Other (Attach description)				<input type="checkbox"/>	Subsea manifold		<input type="checkbox"/>	Floating production system
Drilling Rig Name (if known): Deepwater Horizon								Spar		Other (Attach Description)		
Description of Lease Term Pipelines												
From (Facility/Area/Block)				To (Facility/Area/Block)				Diameter (Feet)		Length (Feet)		
NA												

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): Well Location "A"					Subsea Completion
Anchor Radius (if applicable) in feet:					Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Surface Location			Bottom-Hole Location (For Wells)		
Lease No.	OCS-G 19555				
Area Name	KC				
Block No.	336				
Blockline Departures (in feet)	N/S Departure	813' F_N_L	N/S Departure F__L		
	E/W Departure	4643' F_E_L	E/W Departure F__L		
U-Tier X-Y coordinates	X: 1,785,277.00		X:		
	Y: 9,677,427.00		Y:		
Latitude/Longitude	Latitude 26° 40' 08.374" N		Latitude		
	Longitude 92° 33' 22.589" W		Longitude		
TVD (Feet):		MD (Feet):		Water Depth (Feet): 5,760	
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
1 NA			X=	Y=	
2			X=	Y=	
3			X=	Y=	
4			X=	Y=	
5			X=	Y=	
6			X=	Y=	
7			X=	Y=	
8			X=	Y=	
<p>Paperwork Reduction Act of 1995 Statement: The Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35) requires us to inform you that MMS collects this information as part of an applicant's Exploration Plan or Development Operations Coordination Document submitted for MMS approval. We use the information to facilitate our review and data entry for OCS plans. We will protect proprietary data according to the Freedom of Information Act and 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget Control Number. The use of this form is voluntary. The public reporting burden for this form is included in the burden for preparing Exploration Plans and Development Operations Coordination Documents. We estimate that burden to average 580 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.</p>					

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): Well Location "B"					Subsea Completion
Anchor Radius (if applicable) in feet:					Yes <input type="checkbox"/> X <input type="checkbox"/> No <input type="checkbox"/>
Surface Location			Bottom-Hole Location (For Wells)		
Lease No.	OCS-G 19555				
Area Name	KC				
Block No.	336				
Blockline Departures (in feet)	N/S Departure	813' F _ N _ L	N/S Departure F _ _ L		
	E/W Departure	4893' F _ E _ L	E/W Departure F _ _ L		
Bamber X-Y coordinates	X: 1,785,027.00		X:		
	Y: 9,677,427.00		Y:		
Latitude/Longitude	Latitude 26° 40' 08.403" N		Latitude		
	Longitude 92° 33' 25.346" W		Longitude		
TVD (Feet):		MD (Feet):		Water Depth (Feet): 5,760	
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
1 NA			X=	Y=	
2			X=	Y=	
3			X=	Y=	
4			X=	Y=	
5			X=	Y=	
6			X=	Y=	
7			X=	Y=	
8			X=	Y=	
<p>Paperwork Reduction Act of 1995 Statement: The Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35) requires us to inform you that MMS collects this information as part of an applicant's Exploration Plan or Development Operations Coordination Document submitted for MMS approval. We use the information to facilitate our review and data entry for OCS plans. We will protect proprietary data according to the Freedom of Information Act and 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget Control Number. The use of this form is voluntary. The public reporting burden for this form is included in the burden for preparing Exploration Plans and Development Operations Coordination Documents. We estimate that burden to average 580 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.</p>					

OCS PLAN INFORMATION FORM (CONTINUED)

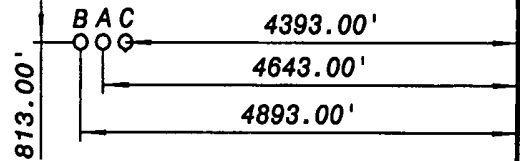
Include one copy of this page for each proposed well/structure

Proposed Well/Structure Location					
Well or Structure Name/Number (If renaming well or structure, reference previous name): Well Location "C"					Subsea Completion
Anchor Radius (if applicable) in feet:					<input type="checkbox"/> Yes <input checked="" type="checkbox"/> X <input type="checkbox"/> No
	Surface Location			Bottom-Hole Location (For Wells)	
Lease No.	OCS-G 19555				
Area Name	KC				
Block No.	336				
Blockline Departures (in feet)	N/S Departure	813'	F _ N _ L	N/S Departure	F _ _ L
	E/W Departure	4393'	F _ E _ L	E/W Departure	F _ _ L
U-Turn X-Y coordinates	X: 1,785,527.00			X:	
	Y: 9,677,427.00			Y:	
Latitude / Longitude	Latitude 26° 40' 08.386" N			Latitude	
	Longitude 92° 33' 19.833" W			Longitude	
TVD (Feet):			MD (Feet):		Water Depth (Feet): 5,760
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
1 NA			X=	Y=	
2			X=	Y=	
3			X=	Y=	
4			X=	Y=	
5			X=	Y=	
6			X=	Y=	
7			X=	Y=	
8			X=	Y=	
<p>Paperwork Reduction Act of 1995 Statement: The Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35) requires us to inform you that MMS collects this information as part of an applicant's Exploration Plan or Development Operations Coordination Document submitted for MMS approval. We use the information to facilitate our review and data entry for OCS plans. We will protect proprietary data according to the Freedom of Information Act and 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget Control Number. The use of this form is voluntary. The public reporting burden for this form is included in the burden for preparing Exploration Plans and Development Operations Coordination Documents. We estimate that burden to average 580 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.</p>					

MMS Form MMS-137 (August 2003 – Supersedes all previous editions of form MMS-137, which may not be used.)

Y=9,678,240.00'

NOTE:
For NAD'83 Data see
Table at lower left.



PROPOSED SURFACE LOCATION
OCS-G 19555, KC 336 LOC. "B"

LAT. = 26°40'08.403"N
LONG. = 92°33'25.346"W NAD'27
X = 1,785,027.00' NAD'27
Y = 9,677,427.00' UTM(15)

PROPOSED SURFACE LOCATION
OCS-G 19555, KC 336 LOC. "A"

LAT. = 26°40'08.394"N
LONG. = 92°33'22.589"W NAD'27
X = 1,785,277.00' NAD'27
Y = 9,677,427.00' UTM(15)

PROPOSED SURFACE LOCATION
OCS-G 19555, KC 336 LOC. "C"

LAT. = 26°40'08.386"N
LONG. = 92°33'19.833"W NAD'27
X = 1,785,527.00' NAD'27
Y = 9,677,427.00' UTM(15)

336

OCS-G 19555
BP EXPLORATION & PRODUCTION

NAD'83 WELL DATA

PROP. LOC. KC 336 "A"	LAT. = 26°40'09.452"N LONG. = 92°33'22.894"W
PROP. LOC. KC 336 "B"	LAT. = 26°40'09.461"N LONG. = 92°33'25.651"W
PROP. LOC. KC 336 "C"	LAT. = 26°40'09.443"N LONG. = 92°33'20.137"W

NOTES:

- 1) All data: North American Datum of 1927 (NAD'27)
(Except where noted)
- 2) All geodetic conversions transformed using NADCON version 2.0 or better, equivalent software

Y=9,662,400.00'

"PUBLIC INFORMATION"



BP EXPLORATION AND PRODUCTION

PROPOSED LOCATION OCS-G 19555, KC 336 LOC. "A", "B" & "C"
Keathley Canyon (OPD# NG15-05) Block 336 Offshore Federal
Plot prepared by BP America Inc. - GPM&S - Land Survey Engineering

Scale: 1" = 2000'

Date: 01/25/05

Drw. by RWB

OG-KC101.dgn

SECTION 2.0

GENERAL INFORMATION

2.1 Contact Information

The authorized representative of BP Exploration & Production Inc. to whom questions regarding this plan should be addressed is:

Scherie Douglas
BP Exploration & Production, Inc.
501 Westlake Park Boulevard
Houston Texas 77079

Office: (281) 366-6843
Cell: (713) 702-7673
Fax: (281) 366-3599
Email: Scherie.Douglas@bp.com

2.2 New or Unusual Technology

BP Exploration & Production Inc. does not propose utilizing any new or unusual technology during the proposed drilling operations.

2.3 Bonding Information

BP Exploration & Production Inc. is covered by a \$3,000,000 area-wide general lease surety bond in accordance with requirements of 30 CFR 256, Subpart I and Notice to Lessees NTL No. 2000-G16 dated September 7, 2000, concerning bond coverage requirements for Outer Continental Shelf (OCS) oil and gas leases and post lease operations.

2.4 Onshore Base and Support Vessels

The onshore support base for the proposed operations will be in Fourchon, Louisiana. Keathley Canyon Block 336 is located approximately 191 miles from the nearest Louisiana shoreline and approximately 222 miles from a proposed onshore support base located in Fourchon, Louisiana.

The C-Port Fourchon, Louisiana facility provides a vehicle parking lot, office space, radio communication equipment, outside and warehouse storage space, crane, forklifts, water and fueling facilities, and boat dock space. The base is owned by Chouest and is leased by BP Exploration & Production Inc. The base is in operation 24 hours each day.

A small amount of vessel and helicopter traffic may originate from bases other those described above in order to address changes in weather, market, and operational conditions. It is expected that this vessel traffic will originate from bases and locations that are in the near vicinity of the base previously described.

The proposed operations are temporary in nature and do not mandate any immediate measures for additional land acquisition or expansion of the existing onshore base facilities.

2.5 Support Vessels

Personnel involved in the proposed operations will typically use their own vehicles as transportation to and from the selected onshore base. The selected vendors will transport 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, taking the most direct route feasible as mandated by weather and traffic conditions. Two types of helicopters and various vessel types will be used during the proposed deepwater exploratory drilling operations. Boats are required when weather conditions restrict helicopter operations, for delivery of supplies and equipment, and for routine personnel change-outs.

Support vessels and travel frequency during the proposed drilling activities are as follows:

<u>Support Vessel</u>	<u>Drilling Trips Per Week</u>
Crew Boat	2
Supply Boat	4
Helicopter	6

A vicinity map showing the surface locations in Keathley Canyon Block 336 relative to the shoreline and onshore base is included as an attachment to this section of the plan.

2.6 Lease Stipulations

Oil and gas exploration activities on the OCS are subject to stipulations developed before the lease sale and would be attached to the lease instrument, as necessary, in the form of mitigating measures. The MMS is responsible for ensuring full compliance with stipulations.

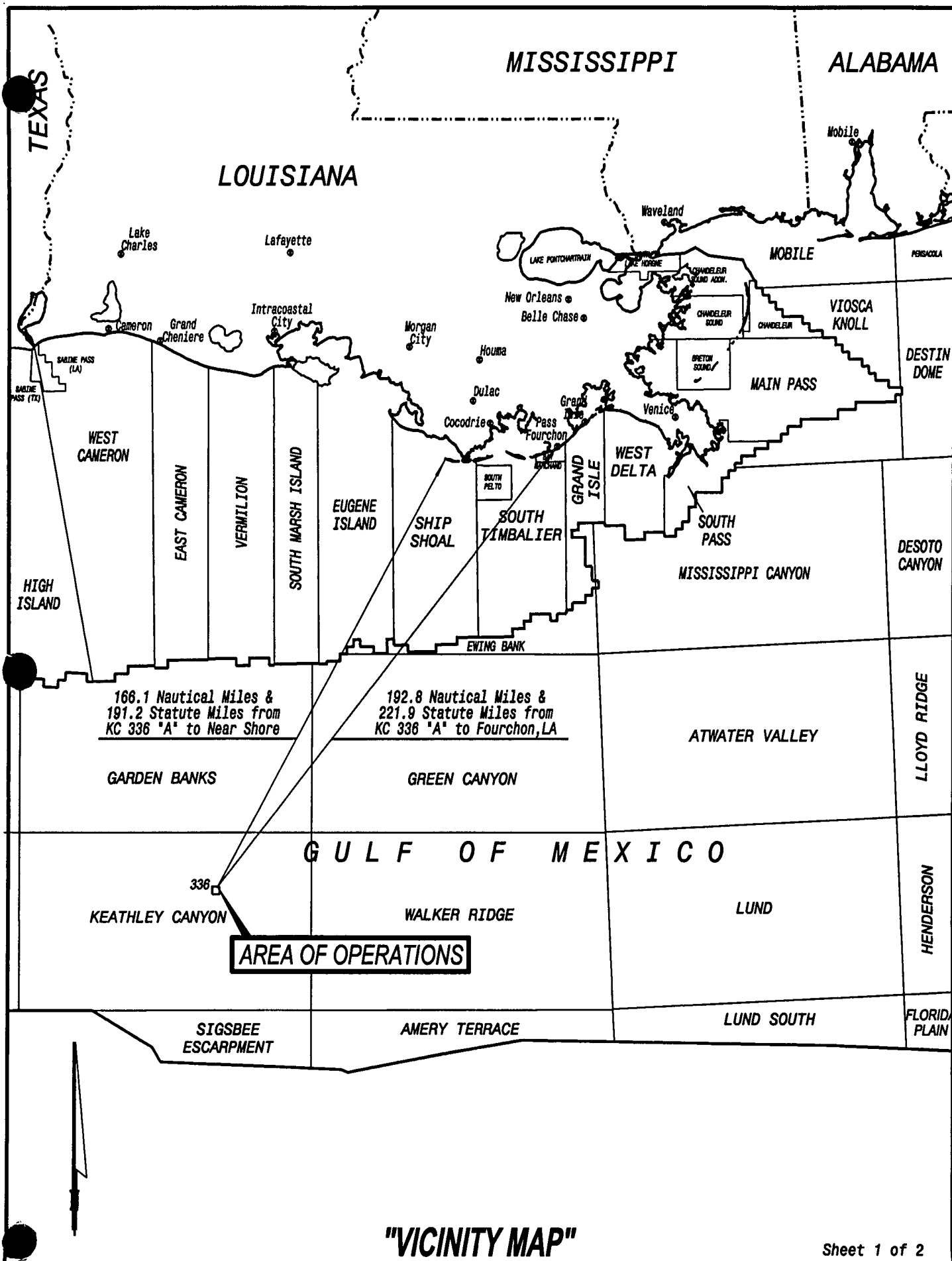
The Minerals Management Service has not imposed any lease stipulations on OCS-G 19555, Keathley Canyon Block 336.

2.7 Project Name

The BP Exploration & Production Inc. deepwater project in Keathley Canyon Block 336 area has been given the project name "Kaskida".

2.8 Attachments

- Vicinity Map



"VICINITY MAP"

Sheet 1 of 2



BP EXPLORATION AND PRODUCTION

PROPOSED LOCATION OCS-G 19555, KC 336 LOC. 'A', 'B' & 'C'
 Keathley Canyon (OPD# NG15-05) Block 336 Offshore Federal
 Plat prepared by BP America Inc. - GPM&S - Land Survey Engineering

Date: 01/25/05
 Drw.by RWB
 OG-KC101.dgn

SECTION 3.0

GEOLOGICAL, GEOPHYSICAL, AND H₂S INFORMATION

3.1 Geological and Geophysical Information

The following subsections describe the various geological and geophysical data that has been included with this plan. Maps and cross-sections can be found at the end of this descriptive section or as attachments to the overall plan.

3.1.1 Structure contour maps – Proprietary information

3.1.2 Interpreted two-dimensional (2-D) and/or three-dimensional (3-D) seismic lines - Proprietary information

3.1.3 Geological structure cross-sections - Proprietary information

3.1.4 Shallow hazards report – Three copies of the Regional 3D Geohazard Assessment Study over Keathley Canyon Blocks 247, 248, 292 and N/2 of 336 prepared by BP in September, 2004 were previously submitted.

3.1.5 Shallow hazards assessment –A shallow hazards analysis prepared, in accordance with NTL No. 98-20, for the proposed surface locations evaluating seafloor and subsurface geologic and manmade features and conditions.

3.1.6 High resolution seismic lines – MMS has reviewed BP's existing 3-D seismic data and has approved in letter dated January 19, 2005, the rationale for using it for shallow hazards clearance as opposed to acquiring HR 2-D site survey data.

3.1.7 Stratigraphic column – Proprietary information

3.1.8 Time vs. depth tables – Proprietary information

3.1.9 Geological objectives – Proprietary information

3.2 H₂S Information

Pursuant to 30 CFR 250.67, BP Exploration & Production, Inc. hereby requests a determination that Keathley Canyon Block 336 is located in an area where the absence of H₂S has been confirmed.

3.3 Attachments to Section 3.0

- Shallow hazards assessment
- MMS letter approving use of 3-D seismic data



United States Department of the Interior

MINERALS MANAGEMENT SERVICE

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



In Reply Refer To: MS 5231

January 19, 2005

Mr. Bernie Care
BP America, Inc.
501 Westlake Park Boulevard
Houston, Texas 77079

Dear Mr. Care:

Reference is made to the letter received January 3, 2005, requesting that BP America, Inc. be granted permission to conduct a shallow hazards analysis based solely on 3-D seismic data in lieu of high resolution geophysical data, as specified in Notice to Lessees and Operators No. 98-20, for Well A in Keathley Canyon Area, Block 336, Lease OCS-G 19555.

The request is hereby approved.

Should you plan to submit shallow hazards analyses for additional wells in the above-mentioned block in the future based solely on 3-D seismic data, a new waiver request will be required.

Sincerely,

Donald C. Howard
Regional Supervisor
Field Operations

cc: Mr. Nat Usher
BP America, Inc.
501 Westlake Park Boulevard
Houston, Texas 77079

TAKE PRIDE
IN AMERICA



CONCLUSIONS

This Shallow Hazards Assessment for location A in Keathley Canyon Block 336 (OCS-G-19555) supplements the Exploration Plan (EP) to be submitted to the Minerals Management Service (MMS). This narrative defines the proposed location and documents the anticipated tophole drilling conditions within a radius of 1,500 ft of the primary location. This clearance area encompasses proposed alternate locations KC 336-B and KC 336-C, 250 ft to the west and east, respectively, of the primary location.

Conditions at the proposed drilling location have been evaluated on the basis of 3D data acquired by Digicon in 1998 and the findings of a regional 3D geohazards assessment for KC 247, 248, 291, and 292, carried out by BP in 2004. Results of the data review indicate a **Negligible risk for encountering shallow gas** in the suprasalt sediments, but **Low and Moderate risks for shallow water flow** in sand prone units E and G, between depths of 1,703 ft to 2,088 ft BML, and 2,263 ft to 2,959 ft BML, respectively. A possible deformed sediment carapace or "rubble zone" overlies the salt canopy at depths from 3,479 ft to 4,236 ft BML. Borehole stability and/or fluid circulation could be an issue within this zone at the proposed well location.

We advise caution, but believe that the risk of danger to personnel and damage to the borehole, equipment and environment is **Low**, provided strict adherence to proper drilling and cementing procedures is followed concerning these hazards until the first pressure containment string is in place.

Bernie Care

Site Investigation Geoscientist
EPTG GeoDrilling Services Team

Nat Usher

Team Leader
EPTG GeoDrilling Services Team

7 February 2005

SECTION 4.0

BIOLOGICAL INFORMATION

4.1 Chemosynthetic Information

Since the proposed seafloor disturbing activities are in water depths greater than 400 meters, maps, analysis, and a statement prepared using the guidance in Attachment B of NTL No. 200-G20, "Deepwater Chemosynthetic Communities" are provided as attachments to Section 3.0.

The proposed wells will be drilled using a dynamically positioning semi-submersible rig, so there are no associated anchors, anchor chains or wire ropes. Features or areas that could support high-density chemosynthetic communities are not located within 1500 feet of each proposed muds and cuttings discharge location.

4.2 Topographic Features Information

MMS and the National Marine Fisheries Service (NMFS) have entered into a programmatic consultation agreement for Essential Fish Habitat, which requires that no bottom disturbing activities may occur within 500 feet of the no-activity zone of a topographic feature. If such bottom disturbing activities are proposed, the MMS is required to consult with the NMFS.

As specified in NTL No. 98-12, "Implementation of Consistent Biological Stipulation Measures in the Central and Western Gulf of Mexico", Keathley Canyon Block 336 is not affected by a topographic feature.

4.3 Live Bottom (Pinnacle Trend) Information

MMS and the National Marine Fisheries Service (NMFS) have entered into a programmatic consultation agreement for Essential Fish Habitat that relates to bottom-disturbing activities occurring within 100 feet of any Pinnacle Trend feature with vertical relief greater than or equal to 8 feet. Any such proposed activities would require MMS to consult with the NMFS pursuant to the agreement.

Keathley Canyon Block 336 is not located in the vicinity of a live bottom area.

4.4 Remotely Operated Vehicle (ROV) Surveys

Pursuant to NTL No. 2003-G03, operators may be required to conduct remotely operated vehicle (ROV) surveys during pre-spud and post-drilling operations for the purpose of biological and physical observations.

BP Exploration & Production, Inc. is familiar with the ROV survey and reporting provisions of the above referenced NTL and will, if required, conduct surveys immediately prior to commencing drilling operations on Well Location A and following the completion of drilling operations.

BP Exploration & Production Inc. would use Transocean's *Deepwater Horizon* rig-based ROV equipped with video imaging capabilities. The survey pattern will consist of six transects centered on the well location with tracks extending approximately 100 meters

away from the well bearings of 30 degrees, 90 degrees, 150 degrees, 210 degrees, 270 degrees, and 330 degrees. The seafloor will be videotaped continuously along the track.

If the ROV survey is required, BP Exploration & Production Inc. will make biological and physical observations as described in NTL 2003-G003 and Form MMS 141 prior to commencing drilling operations and also following the completion of drilling operations but prior to moving the rig off location. The observations will be documented using Form MMS-141 or a facsimile and submitted to the MMS within 60 days after the second survey is completed.

4.5 Archaeological Information

Pursuant to NTL No. 2002-G01 lessees proposing bottom-disturbing activities in areas that have been identified as High Probability Shipwreck blocks or prehistoric areas must submit an archaeological report or a reference to such a report if it has already been provided to the Regional Supervisor.

Keathley Canyon Block 336 is not located in a block designated as High Probability Shipwreck blocks or prehistoric areas.

SECTION 5.0

WASTES AND DISCHARGES INFORMATION

The Minerals Management Service (MMS), U.S. Coast Guard (USCG) and the U.S. Environmental Protection Agency (EPA) regulate the overboard discharge and/or disposal of operational waste associated with oil and gas exploration and production activities.

5.1 Discharges

The term *discharges* describes those wastes generated by the proposed activities that will be disposed of by releasing them into the waters of the Gulf of Mexico at the site where they are generated, usually after receiving some form of treatment before they are released, and in compliance with applicable NPDES permits or State requirements.

BP has requested coverage under the EPA Region VI NPDES General Permit GMG290000 for discharges associated with exploration activities in Keathley Canyon Block 336, and will take applicable steps to ensure all offshore discharges associated with the proposed operations will be conducted in accordance with the permit.

The following table details the estimated discharges expected from the proposed activities:

Type of Waste Approximate Composition	Amount to be Discharged (volume or rate)	Maximum Discharge Rate	Treatment and/or Storage, Discharge Location, and Discharge Method
Water-based drilling fluids	2,000 bbl/well	Bulk discharge of mud in casing following TA	KC 336 Discharge through shunt line to 40' below waterline
Drill cuttings associated with water-based fluids	None	None	None
Drill cuttings associated with synthetic drilling fluids	10,000 bbl/well	100 bbl/hr	KC 336 Discharge through shunt line to 40' below waterline
Muds, cuttings and cement at the seafloor	WBM 48,000 bbl/well Cuttings – 2000 bbl/well	2000 bbl/hr	KC 336 Discharge at seafloor
Produced water	NA	NA	NA
Sanitary wastes	30 gals/person/day	Not applicable	KC 336 Treat with USCG certified MSD & discharge overboard
Domestic wastes	50 gal/person/day	Not applicable	KC 336 Remove floating solids and discharge overboard
Deck drainage	Dependant upon rainfall and rig/deck wash-down	Not applicable	KC 336 Remove free oil and grease and discharge overboard
Well treatment, workover or completion fluids	NA	NA	NA

Type of Waste Approximate Composition	Amount to be Discharged (volume or rate)	Maximum Discharge Rate	Treatment and/or Storage, Discharge Location, and Discharge Method
Uncontaminated fresh or seawater (non-contact cooling water)	25,000 bbl/day	Not applicable	KC 336 Discharge overboard
Desalinization Unit water	1000-10,000 bbl/day	Not applicable	KC 336 Discharge Overboard
Uncontaminated bilge water	None	None	None
Uncontaminated ballast water	As Needed	NA	KC 336 Discharge overboard
Misc discharges to which treatment chemicals have been added	None	Not applicable	None
Other misc discharges	Varied	Not applicable	KC 336 Discharged Overboard

5.2 Disposed Wastes

The term *disposed wastes* describes those wastes generated by the proposed activities that are disposed of by means other than by releasing them into the waters of the Gulf of Mexico at the site where they are generated. These wastes can be disposed of by offsite release, injections, encapsulation, or placement at either onshore or offshore permitted locations for the purpose of returning them back to the environment.

The following table details the estimated disposed wastes expected from the proposed activities:

Type of Waste Approximate Composition	Amount	Rate per Day	Name/Location of Disposal Facility	Treatment and/or Storage, Transport and Disposal Method ⁴
Spent oil-based drilling fluids and cuttings	None	None	None	None
Spent synthetic- based drilling fluids	None	None	None	None
Oil-contaminated produced sand	NA	NA	NA	NA
Waste Oil	200 bbl/yr	0.5 bbl	ASCO	Pack in drums and transport by boat to shorebase
Norm-contaminated wastes	None	NA	NA	NA
Trash and debris	20 m ³	NA	Riverbirch Landfill, Avondale LA	Transport in storage bins on boats to shorebase
Chemical product wastes	100 bbls	2 bbl/day	Vendor or Omega Waste Management	Transport in barrels on boat to shorebase
Workover fluids-Not Discharged	None	NA	NA	NA

SECTION 6.0

OIL SPILL INFORMATION

6.1 Information to comply with the Oil Pollution Act of 1990 (OPA) and the Coastal Zone Management Act (CZMA)

6.1.1 Regional OSRP information – The activities proposed in this plan are covered by a Regional Oil Spill Response Plan (OSRP) that was approved by the MMS on August 10, 2004.

6.1.2 OSRO information – BP utilizes National Response Corporation (NRC) and Marine Spill Response Corporation (MSRC) as the primary providers for oil spill removal equipment. The MSRC STARS network provides for the closest available personnel, as well as an MSRC supervisor to operate the equipment.

6.1.3 Worst-case scenario comparison – The following table provides a worst-case scenario for the proposed activities in this plan as compared to the current OSRP:

Category	Current Regional OSRP WCD	Proposed Exploration Plan WCD
Type of Activity	Drilling	Drilling
Facility Surface Location	MC 587	KC 336
Facility Description	MODU	MODU
Distance to Nearest Shoreline (<i>in miles</i>)	48	191
Volume: Uncontrolled Blowout (<i>one day, bbls</i>)	300,000	200,000
Type of Liquid Hydrocarbon	Crude	Crude
API Gravity	Unknown	30°

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of Tanks	Total Capacity (bbls)	Fluid Gravity (API)
Fuel Oil	Semi-Submersible	4610	4	18440	0.87
Fuel Oil Setting (P)	Semi-Submersible	389	1	389	0.87
Fuel Oil Setting (S)	Semi-Submersible	464	1	464	0.87
Fuel Oil Service	Semi-Submersible	334	2	668	0.87
Lube Oil	Semi-Submersible	54	1	54	0.85

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of Tanks	Total Capacity (bbls)	Fluid Gravity (API)
Purified Lube Oil	Semi-Submersible	36	2	72	0.85
Hydraulic Oil	Semi-Submersible	54	1	54	0.85
Base Oil	Semi-Submersible	2440	2	4880	0.93
Reserve Mud	Semi-Submersible	2579	4	10316	2.38
Mud Pit	Semi-Submersible	223	2	446	2.38
Mud Pit	Semi-Submersible	204	2	408	2.38
Mud Pit	Semi-Submersible	593	1	593	2.38
Mud Pit	Semi-Submersible	766	1	766	2.38
Mud Pit	Semi-Submersible	564	1	564	2.38
Mud Pit	Semi-Submersible	639	1	639	2.38
Mud Pit	Semi-Submersible	629	1	629	2.38
Mud Pit	Semi-Submersible	557	1	557	2.38
Slugging Pit	Semi-Submersible	218	1	218	2.38

This project is located approximately 191 miles from the nearest shore point. Therefore, since the project is greater than 10 miles from shore, the project is defined as a "Far Shore" project.

Since BP has the capability to respond to the worst-case spill scenario included in its Regional OSRP approved on August 10, 2004, and since the worst-case scenario determined for this EP does not replace the worst-case scenario in our Regional OSRP, I hereby certify that BP Exploration & Production, Inc. has the capability to respond, to the maximum extent practicable, to a worst-case discharge, or a substantial threat of such a discharge, resulting from the activities proposed in our EP.

SECTION 7.0

AIR EMISSIONS INFORMATION

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

Primary air pollutants associated with OCS activities are nitrogen oxides, carbon monoxide, sulphur oxides, volatile organic compound, and suspended particulate.

7.1 Calculating Emissions

Plan emissions associated with the proposed drilling operations utilizing the *Transocean Deepwater Horizon* were calculated using the methodology, emission factors and worksheets in Form MMS-138.

7.2 Attachments to Section 7

- Form MMS-138 - Screening Questions and Summary Sheet for KC 336

**EXPLORATION PLAN (EP)
AIR QUALITY SCREENING CHECKLIST**

OMB Control No. XXX
Expiration Date: Pending

COMPANY	BP Exploration & Production, Inc.
AREA	Keathley Canyon
BLOCK	336
LEASE	OCS-G 19555
PLATFORM	NA
WELL	A-C
COMPANY CONTACT	Scherie Douglas
TELEPHONE NO.	281-366-6843
REMARKS	Drill and temporarily abandon 3 (three) exploratory wells

"Yes"	"No"	Air Quality Screening Questions
	X	Is any calculated Complex Total (CT) Emission amount (in tons) associated with your proposed exploration activities more than 90% of the amounts calculated using the following formulas: $CT = 2400D^{2/3}$ for CO, and $CT = 33.3D$ for the other air pollutants (where D = distance to shore in miles)?
	X	Do your emission calculations include any emission reduction measures or modified emission factors?
	X	Are your proposed exploration activities located east of 87.5° W longitude?
	X	Do you expect to encounter H ₂ S 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?

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL
BP Exploration	Keathley Canyon	336	OCS-G 19555	NA	A-C
Year	Emitted Substance				
	PM	SOx	NOx	VOC	CO
2005	84.64	388.27	2909.41	87.28	634.78
2006	84.64	388.27	2909.41	87.28	634.78
2007	84.64	388.27	2909.41	87.28	634.78
Allowable	6360.30	6360.30	6360.30	6360.30	112763.31

SECTION 8.0

ENVIRONMENTAL IMPACT ANALYSIS

8.1 Impact Producing Factors (IPF's)

Environmental Resources	Impact Producing Factors (IPFs) Categories and examples					
	Refer to a recent GOM OCS Lease Sale EIS for a more complete list of IPFs					
	Emissions (air, noise, light, etc.)	Effluents (muds, cuttings, 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, H2S releases)	Other IPFs you identify
Site-specific at Offshore						
Location		(1)	(1)		(1)	
Designated topographic features		(2)	(2)		(2)	
Primeria/Trend area live bottoms		(3)	(3)		(3)	
Eastern Gulf live bottoms		X	(4) x			
Chemosynthetic communities		X			x	
Water quality					x	
Fisheries					x	
Marine mammals	(8) x				(8) x	
Sea turtles	(8) x				(8) x	
Air quality	(9)					
Shallow water sites (known or potential)			(7)			
Prehistoric archaeological sites			(7)			
Vicinity of Offshore						
Location						
Essential fish habitat					(6) x	
Marine and pelagic birds					X	
Public health and safety					(5)	
Coastal and Onshore						
Beaches					(6) x	
Wetlands					(6) x	
Shore birds and coastal nesting birds					(6) x	
Coastal wildlife refuges					(6) x	
Wilderness areas					(6) x	
Other Resources You Identify						

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:
 - a. 4-mile zone of the Flower Garden Banks, or the 3-mile zone of Stetson Bank;
 - b. 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;

- c. *Essential Fish Habitat (EFH) criteria of 500 ft from any no-activity zone; or*
 - d. *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 Activities (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 MMS as being in water depths 400 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 MMS 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 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*

8.2 Analysis

8.2.1 Site Specific at Offshore Location

8.2.1.1 Designated Topographic Features – There are no IPF's (including effluents, physical disturbances to the seafloor, and accidents) from the proposed activities that could cause impacts to topographic features. The site-specific offshore location of the proposed activities is outside the 3-mile zone of any identified topographic feature.

8.2.1.2 Pinnacle Trend Area Live Bottoms - There are no IPF's (including effluents, physical disturbances to the seafloor, and accidents) from the proposed activities that could cause impacts to pinnacle trend area live bottoms. The site-specific offshore location of the proposed activities is not in a pinnacle trend live bottom stipulated block.

8.2.1.3 Eastern Gulf Live Bottoms – The eastern gulf live bottoms are not in the vicinity of BP's proposed operations.

8.2.1.4 Chemosynthetic communities - The proposed activities would occur in deep water (water depths >400 meters). Therefore, IPF's (e.g. physical disturbances to the seafloor, effluents) from the proposed activities have the potential to cause impacts to chemosynthetic communities. However, the proposed activities would be conducted in accordance with NTL 2002-G08 Appendix D. Accordingly, BP has provided MMS with the required maps, analyses and statement(s) prepared using the guidance in Attachment B of NTL No. 2002-G20 "Deepwater Chemosynthetic Communities". As shown in the shallow hazards report accompanying this plan, and the seafloor amplitude map included in Section 3.0 of this plan, no indications of the presence of chemosynthetic communities are recognized on the 3-D seismic data at and around the proposed locations. The risk of chemosynthetic communities at or close to this location is therefore believed to be negligible.

8.2.1.5 Water Quality – Effluents and accidents from the proposed activities could potentially cause impacts to water quality. However, since all discharges will be made in accordance with a general National Pollutant Discharge Elimination System (NPDES) permit issued by the U.S. Environmental Protection Agency, operational discharges are not expected to cause significance adverse impacts to water quality. It is unlikely that an accidental oil spill release would occur from the proposed activities. In the event of such an accidental release, the water quality would be temporarily affected by the dissolved components and small droplets. Currents and microbial degradation would remove the oil from the water column or dilute the constituents to background levels.

8.2.1.6 Fisheries - An accidental oil spill that might occur as a result of the proposed action has the potential to cause some detrimental effects to fisheries. However, it is unlikely that an accidental surface or subsurface oil spill would occur from the proposed activities. If such a spill were to occur in open waters of the OCS proximate to mobile adult finfish or shellfish, the effects would likely be sub-lethal and the extent of damage would be reduced to the capability of adult fish and shellfish to avoid a spill, to metabolize hydrocarbons, and to excrete both metabolites and parent compounds. No adverse activities to fisheries are anticipated as a result of the proposed activities.

8.2.1.7 Marine Mammals – Marine mammals may be adversely impacted by several IPF's, including vessel traffic, noise, accidental oil spills, and loss of trash and debris, all of which could occur due to the proposed action. Chronic and sporadic sub-lethal effects could occur that may stress and/or weaken individuals of a local group or population and make them more susceptible to infection from natural or anthropogenic sources. Few lethal effects are expected from oil spills, chance collisions with service vessels and ingestion of plastic material. Oil spills of any size are estimated to be aperiodic events that may contact cetaceans. Disturbance (e.g., noise) may stress animals, weaken their immune

systems, and make them more vulnerable to parasites and diseases that normally would not be fatal.

The net result of any disturbance would depend on the size and percentage of the population affected, ecological importance of the disturbed area, environmental and biological parameters that influence an animal's sensitivity to disturbance and stress, and the accommodation time in response to prolonged disturbance (Geraci and St. Aubin, et al., 2001). Sperm whales are one of 11 whale species that are hit commonly by ships (Laist et al., 2001). Collisions between OCS vessels and cetaceans within the project area are expected to be unusual events. No adverse impacts to endangered or threatened marine mammals are anticipated as a result of the proposed activities.

8.2.1.8 Sea Turtles - IPF's that could impact sea turtles include vessel traffic, noise, trash and debris, and accidental oil spills. Small numbers of turtles could be killed or injured by chance collision with service vessels or by eating indigestible trash, particularly plastic items, accidentally lost from drill rigs, production facilities and service vessels. Drilling rigs and project vessels produce noise that could disrupt normal behavior patterns and create some stress potentially making sea turtles more susceptible to disease. Oil spills and oil spill response activities are potential threats that could have lethal effects on turtles. Contact with oil, consumption of oil particles, and oil-contaminated prey could seriously affect individual sea turtles. Oil-spill-response planning and the habitat protection requirements of the Oil Pollution Act of 1990 should mitigate the threats.

Most OCS related impacts on sea turtles are expected to be sub-lethal. Chronic sub-lethal effects (e.g., stress) resulting in persistent physiological or behavioral changes and/or avoidance of effected areas could cause declines in survival or productivity, resulting in gradual population declines

No adverse impacts to endangered or threatened sea turtles are anticipated as a result of the proposed activities.

8.2.1.9 Air Quality – The proposed activities are located approximately 191 miles offshore. There would be a limited degree of air quality degradation in the immediate vicinity of the proposed activities. Air quality analysis (included in Section 7 of this plan) is below the MMS exemption level.

8.2.1.10 Shipwreck Sites (known or potential) – There are no known IPF's (including physical disturbances to the seafloor) from the proposed activities that could cause impacts to known or potential shipwreck sites. The proposed activities are not located in, or adjacent to, an OCS block designated by MMS as having high-probability for the occurrence of shipwrecks. Review of the Shallow Hazards Report (submitted with this plan in accordance with NTL 2002-G08, Appendix C, and NTL 98-20) indicates there are no known or potential shipwreck sites located within the survey area.

8.2.1.11 Prehistoric Archaeological Sites - There are no IPF's (including physical disturbances to the seafloor) from the proposed activities that could cause impacts to prehistoric archaeological sites, as the proposed activities are not located in, or adjacent to, an OCS block designated by MMS as having high-probability for the occurrence of prehistoric archaeological sites.

8.2.2 Vicinity of Offshore Location

8.2.2.1 Essential Fish Habitat - An accidental oil spill that might occur as a result of the proposed action has the potential to cause some detrimental effects on essential fish habitat. However, it is unlikely that an accidental surface or subsurface oil spill would occur from the proposed activities. If such a spill were to occur in open waters of the OCS proximate to mobile adult finfish or shellfish, the effects would likely be sub-lethal and the extent of damage would be reduced to the capability of adult fish and shellfish to avoid a spill, to metabolize hydrocarbons, and to excrete both metabolites and parent compounds. No adverse impacts to essential fish habitat are anticipated as a result of the proposed activities.

8.2.2.2 Marine and Pelagic Birds - An accidental oil spill that might occur as a result of the proposed action has the potential to impact marine and pelagic birds – birds could become oiled. However, it is unlikely that an accidental oil spill would occur from the proposed activities. No adverse impacts to marine and pelagic birds are anticipated as a result of the proposed activities.

8.2.2.3 Public Health and Safety – There are no anticipated IPF's (including any accidental H₂S releases) from the proposed activities that could impact public health and safety. In accordance with 30 CFR 250.417(c), BP has requested the area of proposed activities be classified as "H₂S absent".

8.2.3 Coastal and Onshore

8.2.3.1 Beaches - An accidental oil spill from the proposed activities could cause impacts to beaches. However, due to the distance from shore (approximately 191 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. Both the historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in the plan will be covered by our regional OSRP (refer to information submitted in Section 6 of this plan).

8.2.3.2 Wetlands - An accidental oil spill from the proposed activities could cause impacts to wetlands. However, due to the distance from shore (approximately 191 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. Both the

historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in the plan will be covered by our regional OSRP (refer to information submitted in Section 6 of this plan).

8.2.3.3 Shore Birds and Coastal Nesting Birds - An accidental oil spill from the proposed activities could cause impacts to shore birds and coastal nesting birds. However, due to the distance from shore (approximately 191 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. Both the historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in the plan will be covered by our regional OSRP (refer to information submitted in Section 6 of this plan).

8.2.3.4 Coastal Wildlife Refuges - An accidental oil spill from the proposed activities could cause impacts to coastal wildlife refuges. However, due to the distance from shore (approximately 191 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. Both the historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in the plan will be covered by our regional OSRP (refer to information submitted in Section 6 of this plan).

8.2.3.5 Wilderness Areas - An accidental oil spill from the proposed activities could cause impacts to coastal wilderness areas. However, due to the distance from shore (approximately 191 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. Both the historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in the plan will be covered by our regional OSRP (refer to information submitted in Section 6 of this plan).

8.2.3.6 Other Environmental Resources Identified - BP has not identified any other environmental resources other than those addressed above.

8.3 Impacts on Proposed Activities - The site-specific environmental conditions have been taken into account for the proposed activities and no impacts are expected as a result of these conditions.

A shallow hazards survey and shallow hazards assessment of any seafloor and subsurface geological or manmade features and conditions that may adversely affect

operations has been submitted in accordance with NTL 2002-G08, Appendix C and NTL 98-20. Based on the above report and analysis, BP has concluded there are no surface or subsurface geological or manmade features or conditions that may adversely affect the proposed activities.

8.4 Alternatives – No alternatives to the proposed activities were considered to reduce environmental impacts.

8.5 Mitigation Measures – No mitigation measures other than those required by regulation and BP policy will be employed to avoid, diminish or eliminate potential impacts on environmental resources.

8.6 Consultation – No agencies or persons were consulted regarding potential impacts associated with the proposed activities.

8.7 References: - Although not always cited, the following were utilized in preparing the EIA:

- Hazard Survey prepared by BP 2004
- MMS EIS – Lease Sale 187
- OCS EIS/EA MMS 2002-052
- NPDES Permit GMG290000
- Air Quality Review
- Regional Oil Spill Response Plan

SECTION 9.0

COASTAL ZONE CONSISTENCY

Under direction of the Coastal Zone Management Act (CZMA), the states of Alabama, Florida, Louisiana, Mississippi and Texas developed Coastal Zone Management Programs (CZMP) to allow for the supervision of significant land and water use activities that take place within or that could significantly impact their respective coastal zones.

Issues identified in the Louisiana CZMP include the following: general coastal use guidelines, levees, linear facilities (pipelines); dredges soil deposition; shoreline modifications, surface alterations, hydrologic and sediment transport modifications; waste disposal; uses that result in the alteration of waters draining into coastal waters; oil, gas or other mineral activities; and air and water quality.

The following Louisiana guidelines are applicable to the proposed operations:

TOPIC	GUIDELINE NO.	CROSS REFERENCE
Air Quality	1.2	Section 7.0
Water Quality	1.2	Section 5.0
Permitting Authority	1.6	Sections 4.0 thru 8.0
Adverse Effects	1.7	Section 8.0
Multiple Use	1.9	Section 2.0
Waste Storage, Treatment and Disposal Facilities	8.1	Section 5.0
Hazardous Waste Storage, Treatment and Disposal	8.2	Section 5.0
Approved Disposal Sites	8.8	Section 5.0
Radioactive Waste	8.9	Section 5.0
Siting of Exploration, Production Activities	10.3	Sections 2.0 and 8.0
Access to Site	10.5	Section 2.0
Best Practical Techniques for Drilling/Production Sites	10.6	Sections 2.0 and 5.0
Drilling and Production Equipment Guidelines for Preventing Adverse Environmental Effects	10.10	Section 1.0
Effective Environmental Protection and Emergency or Contingency Plans	10.11	Sections 1.0 and 6.0

9.2 Attachments to Section 9.0

- Certificate of Coastal Zone Management Consistency for the State of Louisiana

COASTAL ZONE MANAGEMENT
CONSISTENCY CERTIFICATION

Initial Exploration Plan

Type of OCS Plan

Keathley Canyon Block 336

Area and Block

OCS-G 19555

Lease Number

The proposed activities described in detail in this OCS Plan comply with Louisiana's approved Coastal Management Program(s) and will be conducted in a manner consistent with such Program(s).

BP Exploration and Production, Inc.

Lessee or Operator

Acherie Douglas

Certifying Official

2/14/05

Date