

UNITED STATES GOVERNMENT
MEMORANDUM

December 20, 2005


To: Public Information (MS 5030)
From: Plan Coordinator, FO, Plans Section (MS 5231)

Subject: Public Information copy of plan

| | | |
|-------------|---|---|
| Control # | - | N-08624 |
| Type | - | Initial Development Operations Coordinations Document |
| Lease(s) | - | OCS-G25081 Block - 977 Ewing Bank Area |
| Operator | - | W & T Offshore, Inc. |
| Description | - | Subsea Well No SS001 |
| Rig Type | - | Not Found |

Attached is a copy of the subject plan.

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


Karen Dunlap
Plan Coordinator

| Site Type/Name | Botm Lse/Area/Blk | Surface Location | Surf Lse/Area/Blk |
|----------------|-------------------|-------------------|-------------------|
| WELL/SS001 | G25081/EW/977 | 340 FNL, 5900 FWL | G25081/EW/977 |

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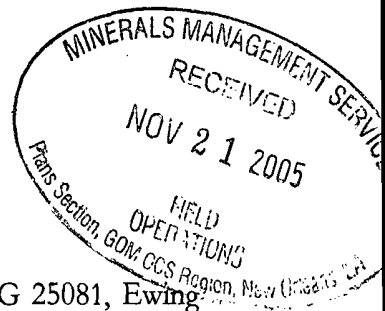
W&T OFFSHORE

I N C O R P O R A T E D

November 18, 2005

U.S. Department of the Interior
Minerals Management Service
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Attention: Mr. Nick Wetzel
Plans Unit



RE: Initial Development Operations Coordination Document for Lease OCS-G 25081, Ewing Bank Block 977, OCS Federal Waters, Gulf of Mexico, Offshore, Louisiana (*Dice Prospect*)

Mr. Wetzel:

In accordance with the provisions of Title 30 CFR 250.203 and that certain Notice to Lessees (NTL 2003-G17), W&T Offshore, Inc. (W&T) hereby submits for your review and approval an Initial Development Operations Coordination Document (Plan) for Lease OCS-G 25081, Ewing Bank Block 977, Offshore, Louisiana. Excluded from the Public Information copies are certain geologic and geophysical discussions and attachments.

Enclosed are two Proprietary Information copies (one hard copy and one CD) and three Public Information copies (one hard copy and two CD's) of the Plan.

As part of an internal audit, W&T confirmed the required Plan to commence production from Lease OCS-G 25081, Well No. SS001 (ST00BP00) had not been submitted for approval prior to commencing production on January 9, 2005. The required Conservation Information Document, Deepwater Operations Plan, associated pipeline and facility applications, and surface commingling and measurement approvals had all been timely submitted and approved prior to commencing production.

Submittal of this Plan was an administrative oversight based on our internal system utilized to track regulatory filings. The tracking system was not initiated in this case which is typically triggered by submittal of the Initial Exploration Plan; which in this case was filed by our partner on this prospect.

Should additional information be required, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Janet Cole/cjg".

Janet Cole
Regulatory Coordinator

JC:CJG
Attachments

Public Information

W & T OFFSHORE, INC.
3900 N. Causeway Blvd., Suite 1200
Metairie, Louisiana 70002

Janet Cole
janet@wtoffshore.net

**INITIAL DEVELOPMENT OPERATIONS
COORDINATION DOCUMENT**

LEASE OCS-G 25081

EWING BANK BLOCK 977

PROJECT NAME: DICE PROSPECT

PREPARED BY:

Kimberly Hicks
R.E.M. Solutions, Inc.
17171 Park Row, Suite 390
Houston, Texas 77084
281.492.8562 (Phone)
281.492.6117 (Fax)
kimberly@remsolutionsinc.com

DATED:

November 18, 2005

SECTION A

Plan Contents

A. Description, Objectives and Schedule

Lease OCS-G 25081, Ewing Bank Block 977 was acquired by Mariner Energy, Inc. at the Central Gulf of Mexico Lease Sale No. 185 held on March 19, 2003. The lease was issued with an effective date of July 1, 2003 and a primary term ending date of June 30, 2008.

The current lease operatorship and ownership are as follows:

| Area/Block Lease No. | Operator | Ownership |
|---|--------------------|--|
| Ewing Bank Block 977 Lease OCS-G 25081 | W&T Offshore, Inc. | W&T Offshore, Inc. Mariner Energy, Inc. |

Effective November 21, 2004, Minerals Management Service approved Mariner Energy, Inc.'s Initial Exploration Plan (Control No. N-7934) providing for the drilling and completion operations associated with proposed Well Locations A and B. Effective October 15, 2003, W&T Offshore, Inc. (W&T) was designated operator of Lease OCS-G 25081, Ewing Bank Block 977, and subsequently commenced the drilling and completion of Well No. SS001 (ST00BP00).

This Initial Development Operations Coordination Document (Plan) provides for the commencement of production of Lease OCS-G 25081, Well No. SS001 (ST00BP00).

W&T does not propose any additional drilling under this Plan; therefore, a geological discussion is not required.

B. Location

Included as *Attachments A-1 to A-3* is Form MMS-137 "OCS Plan Information Form", well location plat and bathymetry map detailing the existing surface location disturbance area.

C. Drilling Unit

The drilling unit for the activity associated with the subject well was previously addressed in the approved Initial Exploration Plan (Control No. N-7934).

D. Production Facility

The existing subsea well is equipped with a wellhead and connected via an existing 4-inch bulk right-of-way pipeline with associated umbilical (ROW OCS-G 25428) to W&T's existing Eugene Island Block 371 B platform (Lease OCS-G 05525/Complex ID No. 23308).

SECTION A

Contents of Plan - Continued

This manned structure was originally installed in 1987, and currently processes produced hydrocarbons from Lease OCS-G 05525, Eugene Island Block 371 and incoming production from Lease OCS-G 16374, Eugene Island Block 386 (Tarpon Operating & Development, LLC) and Lease OCS-G 25081, Ewing Bank Block 977.

Facility modifications to process the incoming production from Lease OCS-G 25081, Well No. SS001 (ST00BP00) at the host facility included installation of a line heater, dedicated separator and associated platform piping.

Included as **Attachment A-4** is a platform assessment matrix for the existing host facility at Eugene Island Block 371.

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

Minerals Management Service regulations contained in Title 30 CFR Part 250, Subparts C, D, E, and O mandate the operations comply with well control, pollution prevention, construction and welding procedures as described in Title 30 CFR Part 250, Subparts C, D, E, and O; and as further clarified by MMS Notices to Lessees.

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

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

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

OCS Plan Information Form

**Attachment A-1
(Public Information)**

OCS PLAN INFORMATION FORM

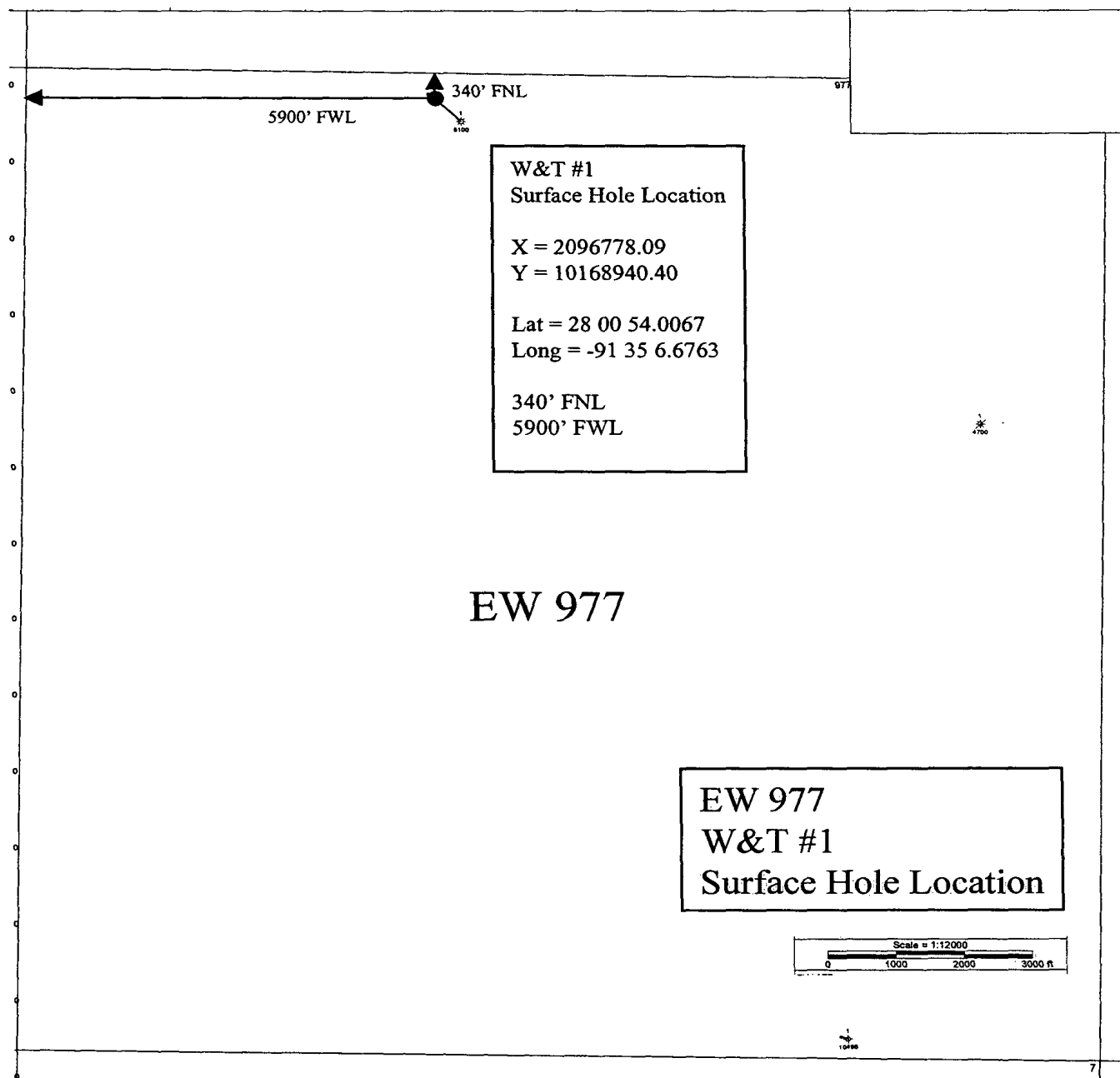
| General Information | | | | | | | | | | | | |
|---|--|----------------------------|----------|---------------------------------------|---------------|---|------------------------------------|----------|--|--------------------------------------|-----|----|
| Type of OCS Plan | | Exploration Plan (EP) | | X | | Development Operations Coordination Document (DOCD) | | | | | | |
| Company Name: W&T Offshore, Inc. | | | | MMS Operation Number: 01284 | | | | | | | | |
| Address: 3900 N. Causeway Blvd, Suite 1200 | | | | Contact Person: Janet Cole | | | | | | | | |
| Metairie, Louisiana 70002 | | | | Phone Number: 504.831.4171 | | | | | | | | |
| | | | | E-Mail Address: janet@wtoffshore.net | | | | | | | | |
| Lease(s): OCS-G 25081 | | | Area: EW | | Block(s): 977 | | Project Name (If Applicable): Dice | | | | | |
| Objective(s): | | Oil | X | Gas | Sulphur | Salt | Shorebase: Fourchon, LA | | | Distance to Closest Land (Miles): 74 | | |
| Description of Proposed Activities (Mark all that apply) | | | | | | | | | | | | |
| Exploration drilling | | | | Development drilling | | | | | | | | |
| Well completion | | | | Installation of production platform | | | | | | | | |
| Well test flaring (for more than 48 hours) | | | | Installation of production facilities | | | | | | | | |
| Installation of caisson or platform as well protection structure | | | | Installation of satellite structure | | | | | | | | |
| Installation of subsea wellheads and/or manifolds | | | | X | | Commence production | | | | | | |
| 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? | | | | | | | | | | X | Yes | No |
| Do you propose to use new or unusual technology to conduct your activities? | | | | | | | | | | | Yes | No |
| Do you propose any facility that will serve as a host facility for deepwater subsea development? | | | | | | | | | | | Yes | No |
| Do you propose any activities that may disturb an MMS-designated high-probability archaeological area? | | | | | | | | | | | Yes | No |
| Have all of the surface locations of your proposed activities been previously reviewed and approved by MMS? | | | | | | | | | | X | Yes | No |
| Tentative Schedule of Proposed Activities | | | | | | | | | | | | |
| Proposed Activity | | | | | | Start Date | | End Date | | No. of Days | | |
| Commence Production from Lease OCS-G 25081, Well No. SS001 (ST00BP00) | | | | | | 01/09/2005 | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| Description of Drilling Rig | | | | | | Description of Production Platform | | | | | | |
| Jackup | | Drillship | | Caisson | | Tension Leg Platform | | | | | | |
| Gorilla Jackup | | Platform rig | | Well protector | | Compliant tower | | | | | | |
| Semi-submersible | | Submersible | | Fixed Platform | | Guyed tower | | | | | | |
| DP Semi-submersible | | Other (Attach description) | | Subsea manifold | | Floating production system | | | | | | |
| Drilling Rig Name (if known): | | | | 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 No. SS001 (ST00BP00) | | | | | Subsea Completion |
| Anchor Radius (if applicable) in feet: NA | | | | | <input checked="" type="checkbox"/> X <input type="checkbox"/> Yes <input type="checkbox"/> No |
| | Surface Location | | Bottom-Hole Location (For Wells) | | |
| Lease No. | OCS-G 25081 | | OCS-G 25081 | | |
| Area Name | Ewing Bank Block | | Ewing Bank | | |
| Block | 977 | | 977 | | |
| Blockline Departures (in feet) | N/S Departure: 340' F N L | | N/S Departure: | | |
| | E/W Departure: 5900' F W L | | E/S Departure: | | |
| Lambert X-Y coordinates | X: 2096778.09 | | X: | | |
| | Y: 10168940.40 | | Y: | | |
| Latitude / Longitude | Latitude 28-00-54.0067 | | Latitude | | |
| | Longitude 91-35-06.6763 | | Longitude | | |
| TVD (Feet): | | MD (Feet): | | Water Depth (Feet): 550' | |
| 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 |
| NA | | | X= | Y= | |
| | | | X= | Y= | |
| | | | X= | Y= | |
| | | | X= | Y= | |
| | | | X= | Y= | |
| | | | X= | Y= | |
| | | | X= | Y= | |
| | | | 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> | | | | | |

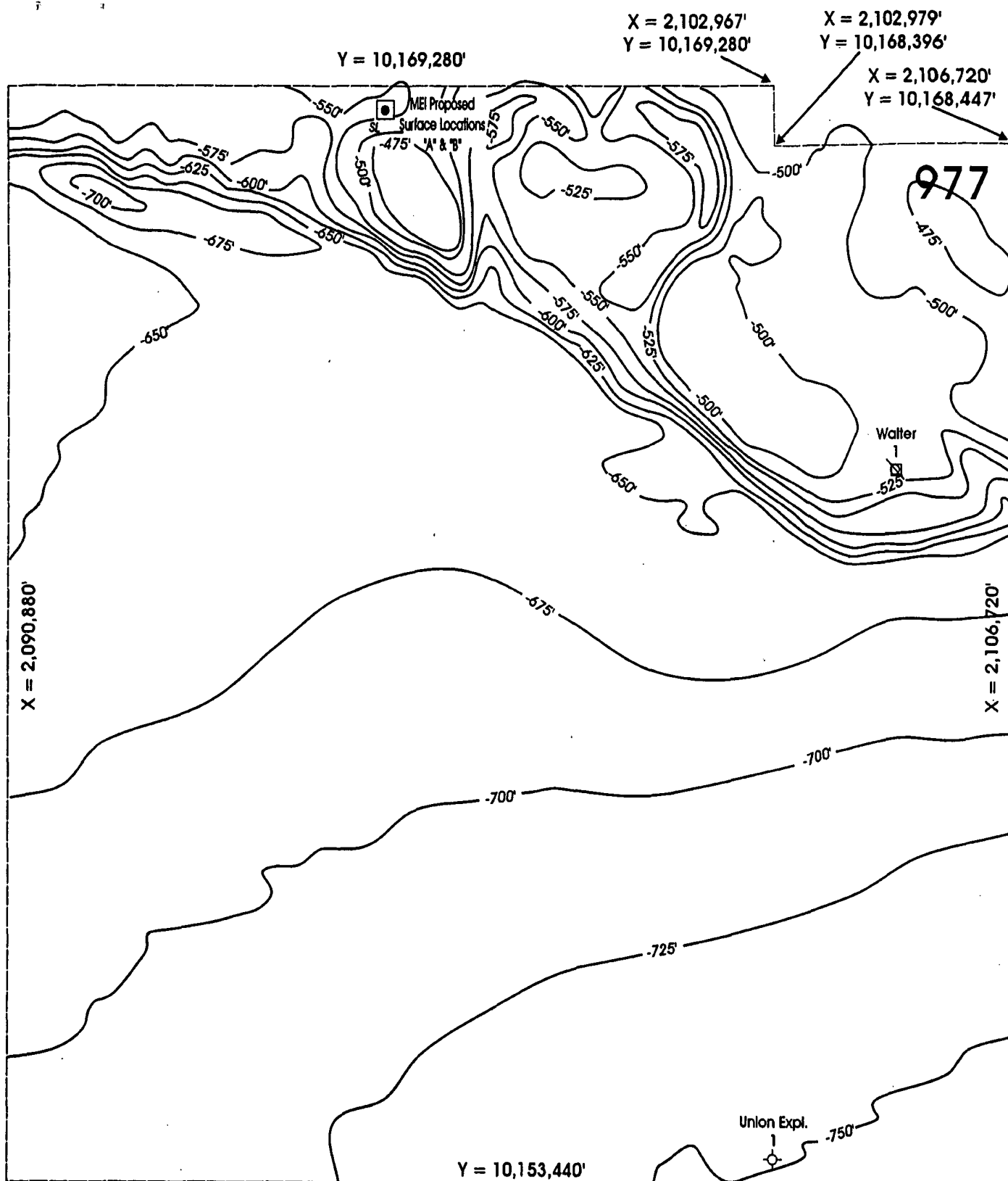
Well Location Plat


**Attachment A-2
(Public Information)**



Bathymetry Map

Attachment A-3
(Public Information)



 **MARINER ENERGY, INC.**
 EWING BANK 977
 OCS-G 25081
 Locations "A" & "B"
 Bathymetry Map

1" = 2000'
 09-23-03

Structure Assessment Matrix

**Attachment A-4
(Public Information)**

Eugene Island Block 371, Platform B
Complex ID No. 23308

Platform Assessment for DOCD – Lease OCS-G 25081, Well No. SS001
(ST00BP00), Ewing Bank Block 977

1. Was the structure installed within the last 5 years? If so, do your proposed activities require a structural modification that would increase loading on the structure beyond the original design?

Platform B was installed in 1987.

2. Will the structure change from unmanned to manned?

Platform is currently manned. No changes.

3. Are you adding facilities to the structure which will result in 10% or greater change from original design parameters?

No

4. Will your proposed activities increase loading on structure resulting in 10% or greater change from original design parameters?

No

5. Is your deck height adequate according to API RP2A-WSD Section 17.2.4?

Yes

6. Has the structure undergone an annual topside inspection? Was any damage discovered by this inspection?

No

7. Has the structure undergone an underwater inspection within the last 5 years? Was any damage discovered by this inspection?

Yes / No

SECTION B

General Information

A. Contact

Questions or requests for additional information should be made to W&T's authorized representative for this project:

Janet Cole
Regulatory Coordinator
8 Greenway Plaza, Suite 1330
Houston, Texas 77046
713.626.8525 (Phone)
janet@wt offshore.net

B. Project Name

The development activity associated with Lease OCS-G 25081, Ewing Bank Block 977 has been designated as the Dice Prospect.

C. Production Rates and Life of Reserves

W&T estimates the life of reserves for the proposed development activity to be with the following estimated combined production rates:

D. New or Unusual Technology

W&T did not incorporate any new and/or unusual technology for the operations provided for in the development of this prospect.

E. Bonding Information

In accordance with Title 30 CFR Part 256, Subpart I, W&T Offshore, Inc. has on file with the Minerals Management Service Gulf of Mexico Regional Office a \$3,000,000 Areawide Development Bond.

As deemed warranted, Minerals Management Service will contact the designated operator in the event a supplemental bond is required for the proposed operations, as outlined in Notice to Lessees (NTL) 2003-N06 to cover plugging liability of the wellbores, removal of associated well protector structures and site clearance.

SECTION B

General Information - Continued

W&T is on the exempt list with the Minerals Management Service for supplemental/bonding.

F. Onshore Base and Support Vessels

The surface disturbances in Ewing Bank Block 977 are located approximately 74 miles from the nearest Louisiana shoreline, and approximately 108 miles from the onshore support base located in Fourchon, Louisiana.

W&T utilizes an existing onshore base to accomplish the following routine operations, and does not anticipate the need for any expansion of the selected facilities as a result of the activities provided for in this Plan:

- Loading/Offloading point for equipment supporting the offshore operations,
- Dispatching personnel and equipment,
- Temporary storage for materials and equipment,
- 24-Hour Dispatcher

Personnel involved in the operations 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 are then transported to the field via crew and/or supply vessels and helicopters.

W&T does not anticipate routine field visits to the subsea development project under than under emergency and/or unplanned well interventions activities.

A Vicinity Plat showing the surface location in Ewing Bank Block 977 relative to the shoreline and onshore base is included as ***Attachment B-1***.

G. Lease Stipulations

Under the Outer Continental Shelf Lands Act, the Minerals Management Service is charged with the responsibility of managing and regulating the exploration and development on the OCS.

As part of the regulatory process, an Environmental Impact Statement (EIS) is prepared for each lease sale, at which time mitigation measures are addressed in the form of lease stipulations, which then become part of the oil and gas lease terms and are therefore enforceable as part of that lease.

SECTION B

General Information - Continued

As part of this process, the designated operator proposing to conduct related exploratory and development activities, must review the applicable lease stipulations, as well as other special conditions, which may be imposed by the Minerals Management Service, and other governing agencies.

Military Warning Area

The hold and save harmless section of the Military Areas Stipulation serves to protect the U.S. Government from liability in the event of an accident involving the designated oil and gas lease operator and military activities.

The electromagnetic emissions section of the stipulation requires the operator and its agents to reduce and curtail the use of radio or other equipment emitting electromagnetic energy within some areas.

This serves to reduce the impact of oil and gas activity on the communications of military missions and reduces the possible effects of electromagnetic energy transmissions on missile testing, tracking, and detonation.

The operational section requires notification to the military of oil and gas activity to take place within a military use area. This allows the base commander to plan military missions and maneuvers that may avoid the areas where oil and gas activities are taking place or to schedule around these activities. Prior notification helps reduce the potential impacts associated with vessels and helicopters traveling unannounced through areas where military activities are underway.

The Military Areas Stipulation reduces potential impacts, particularly in regards to safety, but does not reduce or eliminate the actual physical presence of oil and gas operations in areas where military operations are conducted.

The reduction in potential impacts resulting from this stipulation makes multiple-use conflicts most unlikely. Without the stipulation, some potential conflict is likely. The best indicator of the overall effectiveness of the stipulation may be that there has never been an accident involving a conflict between military operations and oil and gas activities.

The proposed surface disturbance in Ewing Bank Block 977 is located within Military Warning Area W-59A. Therefore, in accordance with the requirements of the referenced stipulation, W&T will contact the Naval Air Station-JRB in order to coordinate and control the electromagnetic emissions during the operations.

SECTION B

General Information - Continued

Topographic Features

The topographic features of the Central Gulf provide habitat for coral and coral community organisms. These communities could be severely and adversely impacted by oil and gas activities resulting from the proposed action if such activities took place on or near these communities without the Topographic Features Stipulation and if such activities were not mitigated. The DOI has recognized this problem for some years, and since 1973 stipulations have been made a part of leases on blocks on or near these biotic communities so that impacts from nearby oil and gas activities were mitigated to the greatest extent possible. This stipulation would not prevent the recovery of oil and gas resources, but it would serve to protect valuable and sensitive biological resources. The stipulation establishes No Activity Zones at the topographic features. Within the No Activity Zones, no operations, anchoring, or structures are allowed. Outside the No Activity Zones, additional restrictive zones (1000-meter zone, 1-mile zone and 3-mile zone) are established within which oil and gas operations could occur, but within which drilling discharges would be shunted.

The purpose of the stipulation is to protect the biota of the topographic features from adverse effects due to routine oil and gas activities. Such effects include physical damage from anchoring and rig emplacement and potential toxic and smothering effects from drilling fluids and cuttings discharges. Experience indicates the Topographic Features Stipulation has been effective in preventing damage to the biota of these banks from routine oil and gas activities. Anchoring by the oil and gas industry on the sensitive portions of the topographic features has been prevented. Monitoring studies have demonstrated that the shunting requirements of the stipulations are effective in preventing the drilling fluids and cuttings from impacting the biota of the banks.

The activities provided for in this Plan are located within the vicinity of Jakkula Bank topographic feature. All of the surface disturbance activity associated with this existing subsea well was previously provided for in the approved Initial Exploration Plan.

Protected Species

Lease Stipulation No. 6 is to reference measures to minimize or avoid potential adverse impacts to protected species (sea turtles, marine mammals, gulf sturgeon, and other federally protected species). MMS has issued Notice to Lessees NTL 2004-G01 "Implementation of Seismic Mitigation Measures and Protected Species Observer Program", NTL 2003-G10 "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting" and NTL 2003-G11 "Marine Trash and Debris Awareness and Elimination".

SECTION B

General Information - Continued

Special Conditions

W&T has completed Lease OCS-G 25081, Well No. SS001 (ST00BP00) as a subsea completion. As required by Notice to Lessees (NTL's) 2000-N05 and 2000-N06, W&T submitted and obtained approval of the Conservation Information Document and Deepwater Operations Plan providing for the development and production of this well.

H. Related OCS Facilities and Operations

As addressed earlier in this Plan, W&T transports produced hydrocarbons from Lease OCS-G 25081, Well No. SS001 (ST00BP00) via our existing 4-inch bulk gas right-of-way pipeline with associated umbilical to our Eugene Island Block 371 B Platform (Lease OCS-G 05525/Complex ID No. 23308).

The anticipated flow rates and shut-in times for the proposed pipeline are as follows:

| <i>Origination Point</i> | <i>Flow Rates</i> | <i>Shut In Time</i> |
|------------------------------|-------------------|---------------------|
| Well No. SS001 (ST00BP00) | | |

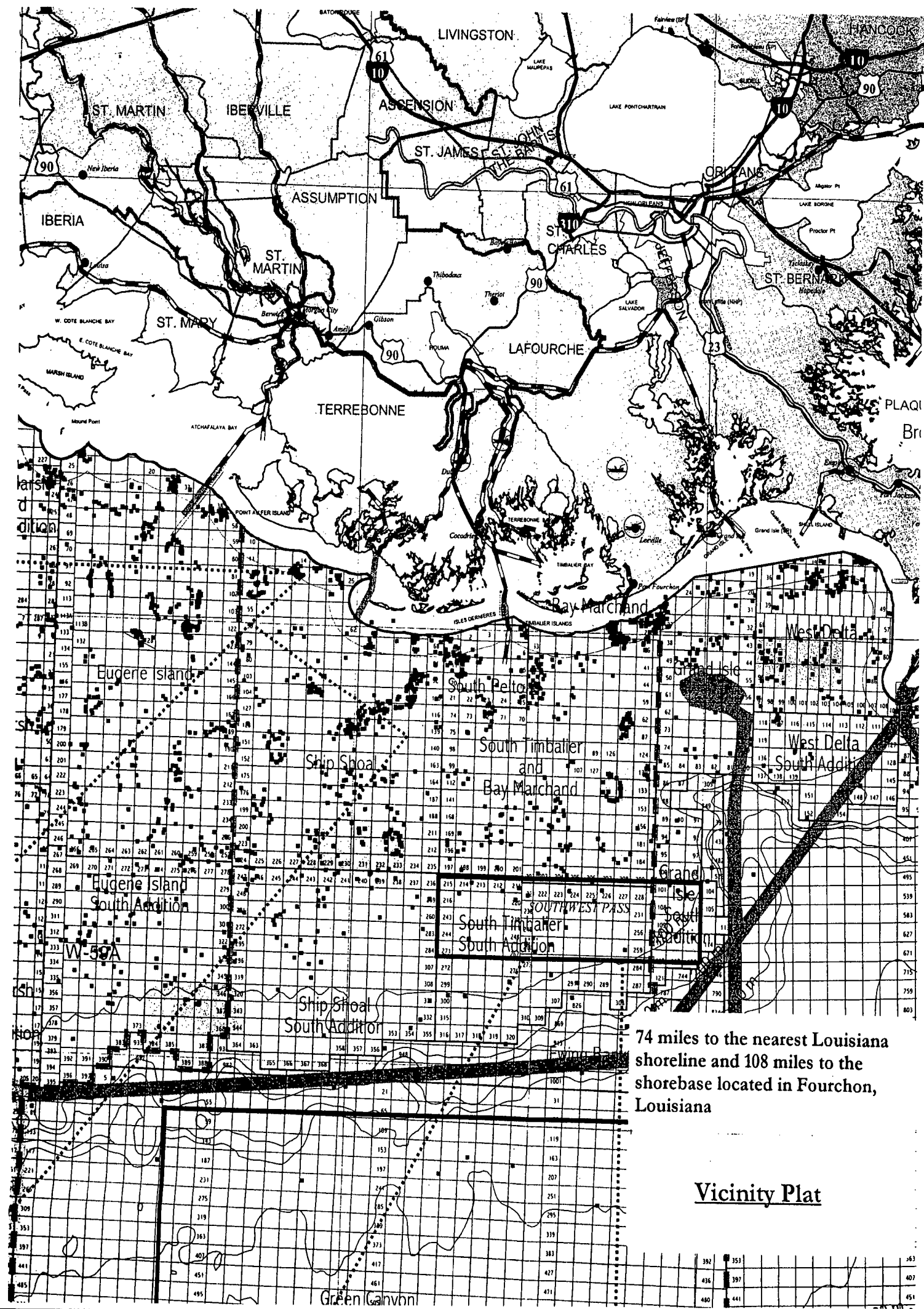
I. Transportation Information

The processed produced hydrocarbons at the Eugene Island Block 371 B Platform is further transported via the departing from the respective structure addressed above will be further transported via W&T's existing 4-inch oil pipeline (Segment No. 9617) and ANR Pipeline Company's existing 16-inch gas pipeline (Segment No. 8478) for ultimate delivery to an onshore operations system.

W&T did not install any new and/or modified onshore facilities to accommodate the production of Lease OCS-G 25081, Ewing Bank Block 977.

Vicinity Plat

**Attachment B-1
(Public Information)**



74 miles to the nearest Louisiana shoreline and 108 miles to the shorebase located in Fourchon, Louisiana

Vicinity Plat

SECTION C

Geological, Geophysical & H2S Information

A. Structure Contour Maps

Included as *Attachment C-1* is a current structure map (depth base and expressed in feet subsea) depicting the entire lease coverage area; drawn on the top of each hydrocarbon sand. The map depicts the actual bottom hole location of Lease OCS-G 25081, Well No. SS001 (ST00BP00) provided for in this Plan.

B. Interpreted Deep Seismic Lines

The existing surface disturbance operations were conducted from a previously approved surface location as provided for in the Initial Plan of Exploration for Lease OCS-G 25081, Ewing Bank Block 977 (Control No. N-7934); therefore, no deep seismic lines are required for the provided activity.

C. Geological Structure Cross Sections

The existing surface disturbance operations were conducted from a previously approved surface location as provided for in the Initial Plan of Exploration for Lease OCS-G 25081, Ewing Bank Block 977 (Control No. N-7934); therefore, no geological cross section is required.

D. Shallow Hazards Report

Pete Trabant compiled a high resolution geophysical survey report for Ewing Bank Block 977 for the purpose of evaluating geologic conditions and inspect for potential hazards or constraints to lease development.

Copies of this report were previously submitted to the Minerals Management Service with the Initial Exploration Plan.

E. Shallow Hazards Assessment

The existing surface disturbance operations were conducted from a previously approved surface location as provided for in the Initial Plan of Exploration for Lease OCS-G 25081, Ewing Bank Block 977 (Control No. N-7934); therefore a shallow hazards analysis is not required.

F. High Resolution Seismic Lines

The existing surface disturbance operations were conducted from a previously approved surface location as provided for in the Initial Plan of Exploration for Lease OCS-G 25081, Ewing Bank Block 977 (Control No. N-7934); therefore seismic lines are not required.

SECTION C

Geological, Geophysical & H2S Information-Continued

G. Stratigraphic Column

A generalized biostratigraphic/lithostratigraphic column from the seafloor to the total depth of the existing well is not required for the operations provided for in this Plan.

H. Hydrogen Sulfide Classification

By letter dated December 2, 2003, Minerals Management Service classified Ewing Bank Block 977 (Well Locations A and B) as "H2S absent".

Structure Map

**Attachment C-1
(Proprietary Information)**

SECTION D

Biological and Physical Information

A. Chemosynthetic Information

The existing seafloor disturbing activities are in water depths less than 400 meters (1312 feet); therefore, this section of the Plan is not applicable.

B. Topographic Features Information

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

The surface disturbance activities provided for in this Plan (and previously approved under the Initial Exploration Plan) are located within the vicinity of the 3-Mile Zone of the Jakkula Bank.

C. Live Bottom (Pinnacle Trend) Information

Certain leases are located in areas characterized by the existence of live bottoms. Live bottom areas are defined as seagrass communities; those areas that contain biological assemblages consisting of sessile invertebrates living upon and attached to naturally occurring hard or rocky formations with rough, broken, or smooth topography; and areas where the lithotope favors the accumulation of turtles, fishes, or other fauna. These leases contain a Live Bottom Stipulation to ensure that impacts from nearby oil and gas activities on these live bottom areas are mitigated to the greatest extent possible.

For each affected lease, the Live Bottom Stipulation requires that you prepare a live bottom survey report containing a bathymetry map prepared by using remote sensing techniques. This report must be submitted to the Gulf of Mexico OCS Region (GOMR) before you may conduct any drilling activities or install any structure, including lease term pipelines in accordance with NTL 99-G16.

Ewing Bank Block 977 is not located within the vicinity of a proposed live bottom area.

D. Remotely Operated Vehicle (ROV Surveys)

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

Ewing Bank Block 977 is not located within an area where ROV Surveys are required.

SECTION D

Biological and Physical Information-Continued

E. Archaeological Reports

At the time of the approved Initial Exploration Plan for Ewing Bank Block 977, the proposed surface disturbance areas were not located within a high probability historic, high probability pre-historic area for potential archaeological resources).

SECTION E

Wastes and Discharge/Disposal 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 drilling, completing, testing and/or production operations from oil and gas exploration and production activities.

Minerals Management Service regulations contained in Title 30 CFR 250.300 require operators to "prevent the unauthorized discharge of pollutants into offshore waters". These same regulations prohibit the intentional disposal of "equipment, cables, chains, containers, or other materials" offshore. Small items must be stored and transported in clearly marked containers and large objects must be individually marked. Additionally, items lost overboard must be recorded in the facility's daily log and reported to MMS as appropriate.

U. S. Coast Guard regulations implement the Marine Pollution Research and Control Act (MARPOL) of 1987 requiring manned offshore rigs, platforms and associated vessels prohibit the dumping of all forms of solid waste at sea with the single exception of ground food wastes, which can be discharged if the facility is beyond 12 nautical miles from the nearest shore. This disposal ban covers all forms of solid waste including plastics, packing material, paper, glass, metal, and other refuse. These regulations also require preparation, monitoring and record keeping requirements for garbage generated on board these facilities. The drilling contractor must maintain a Waste Management Plan, in addition to preparation of a Daily Garbage Log for the handling of these types of waste. MODU's are equipped with bins for temporary storage of certain garbage. Other types of waste, such as food, may be discharged overboard if the discharge can pass through 25-millimeter type mesh screen. Prior to off loading and/or overboard disposal, an entry will be made in the Daily Garbage Log stating the approximate volume, the date of action, name of the vessel, and destination point.

U. S. Environmental Protection Agency regulations address the disposal of oil and gas operational wastes under three Federal Acts. The Resource Conservation and Recovery Act (RCRA), which provides a framework for the safe disposal of discarded materials, regulating the management of solid and hazardous wastes. The direct disposal of operational wastes into offshore waters is limited under the authority of the Clean Water Act. And, when injected underground, oil and gas operational wastes are regulated by the Underground Injection Control program. If any wastes are classified as hazardous, they are to be properly transported using a uniform hazardous waste manifest, documented, and disposed at an approved hazardous waste facility.

A National Pollutant Discharge Elimination System (NPDES) permit, based on effluent limitation guidelines, is required for any discharges into offshore waters. W&T has coverage under the Region VI NPDES General Permit GMG290000 for discharges associated with exploration and development activities in Ewing Bank Block 977 and will take applicable steps to ensure all offshore discharges associated with the operations to be conducted in accordance with the permit.

SECTION E

Wastes and Discharge/Disposal Information-Continued

A. Composition of Solid and Liquid Wastes

Associated solid and liquid wastes generated during the proposed activities addressed in this Plan are well treatment/completion/workover fluids, with associated wastes such as chemicals, cement wastes, sanitary and domestic waste, trash and debris, ballast water, storage displacement water, deck drainage, hydraulic fluids, used oil, oily water and filters, and other miscellaneous minor discharges.

The major operational solid waste in the largest quantities generated from the proposed operations will be the drill cuttings, drilling and/or completion fluids. Other associated wastes include waste chemicals, cement wastes, sanitary and domestic waste, trash and debris, ballast water, storage displacement water, rig wash and deck drainage, hydraulic fluids, used oil, oily water and filters, and other miscellaneous minor discharges.

These wastes are generated into categories, being solid waste (trash and debris), nonhazardous oilfield waste (drilling fluids, nonhazardous waste including cement and oil filters), and hazardous wastes (waste paint or thinners).

The type of discharges included in this permit application allow for the following effluents to be discharged overboard, subject to certain limitations, prohibitions and recordkeeping requirements.

B. Overboard Discharges

In accordance with NTL 2003-G17, overboard discharges generated by the activities are not required for submittal in this Plan.

C. Disposed Wastes

The wastes detailed in *Attachment E-1* are those wastes generated by our proposed activities that are disposed of by means of offsite release, injection, encapsulation, or placement at either onshore or offshore permitted locations for the purpose of returning them back to the environment.

W&T will manifest these wastes prior to being offloaded from the host facility, and transported to shore for disposal at approved sites regulated by the applicable State. Additionally, W&T will comply with any approvals or reporting and recordkeeping requirements imposed by the State where ultimate disposal will occur.

Disposal Table

Attachment E-1
(Public Information)

W&T Offshore, Inc.
Ewing Bank Block 977
Examples of Wastes and Discharges Information

Disposal Table (Wastes to be disposed of, not discharged)

| Type of Waste Approximate Composition | Amount* | Rate per day | Location of Disposal Facility | Treatment and/or Storage, Transport and Disposal Method |
|--|-----------------------|------------------------|--|---|
| Oil-contaminated produced sand | 200 lb/yr | 0.6 bbl/day | Newpark Environmental Fourchon, LA | Store in a cuttings box and transport to onshore approved facility |
| Waste Oil | 200 bbl/yr | 0.5 bbl/yr | Newpark Environmental Fourchon, LA | Pack in drums and transported to an onshore incineration or recycling site |
| Norm – contaminated wastes | 1 ton | Not applicable | Newpark Environmental Fourchon, LA | Transport to a transfer station via dedicated barge or vessel to an approved onshore disposal site |
| Trash and debris | 1,000 ft ³ | 3 ft ³ /day | Newpark Environmental Fourchon, LA | Transport in storage bins on crew boat to disposal facility |
| Chemical product wastes | 50 bbl/yr | 2 bbl/day | Newpark Environmental Fourchon, LA | Transport in containers to shore location |
| Chemical product wastes | 100 bbl | 2 bbl/day | Newpark Environmental Fourchon, LA | Transport in barrels on crew boat to shore location |

*can be expressed as a volume, weight, or rate

SECTION F

Oil Spill Response and Chemical Information

A. Regional Oil Spill Response Plan (OSRP) Information

Effective July 2005, Minerals Management Service approved W&T Offshore, Inc.'s (W&T's) Regional Oil Spill Response Plan (OSRP). The most recent modification, submitted on August 12, 2005, changed the current worst-case discharge. This OSRP also covers associated W&T entities; being Gulf of Mexico Oil and Gas Properties LLC, Offshore Energy I LLC, Offshore Energy II LLC, and Offshore Energy III LLC. Activities provided for in this Initial Development Operations Coordination Document will be covered by the Regional OSRP.

B. Oil Spill Removal Organizations (OSRO)

W&T utilizes Clean Gulf Associates (CGA) as its 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.

C. Worst-Case Scenario Comparison (WCD)

| <i>Category</i> | <i>Current Regional OSRP WCD</i> | <i>Proposed Development WCD</i> |
|--|--------------------------------------|-------------------------------------|
| Type of Activity | Production | Production |
| Facility Surface Location | Ship Shoal Block 149 | Ewing Bank Block 977 |
| Facility Description | Platform A / A-Aux | Well No. SS001 (ST00BP00) |
| Distance to Nearest Shoreline (Miles) | 32 | 74 |
| Volume: | | |
| Storage Tanks (total) | 10,000 | 0 |
| Facility Piping (total) | 0 | 0 |
| Lease Term Pipeline | 0 | 0 |
| Uncontrolled Blowout (day) | 960 | 0 |
| Potential 24 Hour Volume (Bbls.) | 10,960 | 0 |
| Type of Liquid Hydrocarbon | Crude | Dry Gas |
| API Gravity | 29.7° | N/A |

SECTION F

Oil Spill Response and Chemical Information (Continued)

W&T has the capability to respond to the worst-case discharge (WCD) spill scenario included in its Regional OSRP modified August 2005. Since the worst-case scenario determined for our DOCD does not replace the worst-case scenario in our Regional OSRP, I hereby certify that W&T 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 DOCD.

D. Facility Tanks, Production Vessels

Storage tanks (capacity of 25 bbls. or more) will not be required to produce Lease OCS-G 25081, Well No. SS001 (ST00BP00) in Ewing Bank Block 977.

E. Spill Response Sites

The following locations will be used in the event and oil spill occurs as a result of the provided activity.

| Primary Response Equipment Location | Pre-Planned Staging Location(s) |
|--|--|
| Houma, LA | Fourchon, LA Grand Isle, LA |

F. Diesel Oil Supply Vessels

W&T does not anticipate the use of diesel oil supply vessels for the routine producing activity associated Lease OCS-G 25081, Well No. SS001 (ST00BP00).

G. Support Vessel Fuel Tanks

W&T does not anticipate the use of support vessels for the routine producing activity associated Lease OCS-G 25081, Well No. SS001 (ST00BP00).

H. Produced Liquid Hydrocarbon Transportation Vessels

W&T is not proposing any well testing and/or liquid hydrocarbon transportation activities under the Plan that would be associated with producing Lease OCS-G 25081, Well No. SS001 (ST00BP00).

I. Oil and Synthetic-Based Drilling Fluids

According to NTL 2003-G17, this section of the Plan is not applicable to the proposed operations.

SECTION F

Oil Spill Response and Chemical Information (Continued)

J. Oil Characteristics

According to NTL 2003-G17, this section of the Plan is not applicable to the proposed operations.

K. Blowout Scenario

In the event of a blowout during the course of producing the subject well, W&T anticipates a rate of
The wellbore would most likely bridge over in approximately W&T
would immediately activate its Regional Oil Spill Response Plan and Spill Management Team to
initiate potential recovery of liquid hydrocarbons on the receiving water and review potential well
intervention options. In the event a relief well is initiated, W&T would coordinate with the drilling
contractors and/or industry to acquire semi-submersible rig to conduct the proposed operations.

L. Spill Discussion for NEPA Analysis

In the event of an uncontrolled spill release resulting from the activities provided for in this Plan, W&T's Person-In-Charge at the host facility would most likely be the initial individuals to contact the Qualified Individual (QI) or our Spill Management Team (SMT) detailed in the Regional OSRP. The QI would immediately activate the SMT to ascertain the severity of the spill incident. W&T's SMT Incident Command Center is located at O'Brien's Oil Pollution Services office in Slidell, Louisiana.

Dependent upon the severity of the spill incident, a trajectory analysis would be conducted utilizing the MMS Oil Spill Risk Analysis Model (OSRAM) as referenced in our approved Regional OSRP. This trajectory would provide the required information on percentage and timing of potential impact to the shoreline impact areas. The SMT would then identify the areas of sensitivities at potential landfall segment(s), so additional planning may be conducted for shoreline protection strategies. If surveillance indicates a potential threat to shoreline; the appropriate equipment and personnel would be deployed, as outlined in our Regional OSRP.

An overflight may be conducted to determine the extent and dissipation rate of the spill, with potential sampling of the spill release. Mechanical recovery equipment may also be dispatched to the leading edge of the spill, as outlined in our Regional OSRP. If additional offshore response is required, the SMT would initiate the Dispersant Use Plan of the Regional OSRP and utilize the services of Airborne Support Inc.'s aircraft and personnel.

SECTION F

Oil Spill Response and Chemical Information (Continued)

M. Pollution Prevention Measures

As indicated in the volumes noted above, W&T does not anticipate a potential for initiating additional safety, pollution prevention and/or early spill detection measures beyond those already required by Title 30 CFR Part 250.

N. FGBNMS Monitoring Plans

Ewing Bank Block 977 is not located within the vicinity of the Flower Garden National Marine Sanctuary.

SECTION G

Air Emissions Information

The primary air pollutants associated with OCS development activities are:

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

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

A. Calculating Emissions

Included as *Attachment G-1* is the Projected Air Quality Emissions Report (Form MMS-138) cover page and screening responses.

Producing Lease OCS-G 25081, Well No. SS001 (ST00BP00) will not require the use of any associated processing equipment and/or support vessel activity at the surface location in Ewing Bank Block 977.

B. Screening Questions

As evidenced by *Attachment G-1* completion of the worksheets were not required for the activity provided for in this Plan.

C. Emission Reduction Measures

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

D. Verification of Non-Default Emissions Factors

W&T elected to use the default emission factors as provided in *Attachment G-1*.

E. Non-Exempt Activities

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

SECTION G

Air Emissions Information-Continued

G. Modeling Report

The proposed activities are below the exemption amount and should not affect the air quality of an onshore area.

Air Quality Emissions Report

**Attachment G-1
(Public Information)**

DOCD AIR QUALITY SCREENING CHECKLIST

OMB Control No. 1010-0049

OMB Approval Expires: September 30, 2003

| | |
|-----------------|--|
| COMPANY | W&T Offshore, Inc. |
| AREA | Ewing Bank |
| BLOCK | 977 |
| LEASE | OCS-G 25081 |
| PLATFORM | N/A |
| WELL | SS001 (ST00BP00) |
| COMPANY CONTACT | Connie Goers / R.E.M. Solutions, Inc. |
| TELEPHONE NO. | 281.492.8562 |
| REMARKS | To commence production from Subsea Well No. SS001 (ST00BP00) |

| LEASE TERM PIPELINE CONSTRUCTION INFORMATION: | | |
|---|---------------------|-----------------------------------|
| YEAR | NUMBER OF PIPELINES | TOTAL NUMBER OF CONSTRUCTION DAYS |
| 2005 | NA | NA |
| 2006 | | |
| 2007 | | |
| 2008 | | |
| 2009 | | |

| Screening Questions for DOCD's | Yes | No |
|---|-----|----|
| 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: $CT = 3400D^{2/3}$ 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 |
| Does or will the facility complex associated with your proposed development and production activities process production from eight or more wells? | | X |
| Do you expect to encounter H ₂ S at concentrations greater than 20 parts per million (ppm)? | | X |
| Do you propose to flare or vent natural gas in excess of the criteria set forth under 250.1105(a)(2) and (3)? | | X |
| Do you propose to burn produced hydrocarbon liquids? | | X |
| Are your proposed development and production activities located within 25 miles from shore? | | X |
| Are your proposed development and production activities located within 200 kilometers of the Breton Wilderness Area? | | X |

| Air Pollutant | Plan Emission Amounts ¹ (tons) | Calculated Exemption Amounts ² (tons) | Calculated Complex Total Emission Amounts ³ (tons) |
|------------------------------------|---|--|---|
| Carbon monoxide (CO) | NA | 59928.5 | NA |
| Particulate matter (PM) | NA | 2464.2 | NA |
| Sulphur dioxide (SO ₂) | NA | 2464.2 | NA |
| Nitrogen oxides (NOx) | NA | 2464.2 | NA |
| Volatile organic compounds (VOC) | NA | 2464.2 | NA |

¹ For activities proposed in your EP or DOCD, list the projected emissions calculated from the worksheets.

² List the exemption amounts in your proposed activities calculated using the formulas in 30 CFR 250.303(d).

³ List the complex total emissions associated with your proposed activities calculated from the worksheets.

SECTION H

Environmental Impact Analysis

A. IMPACT PRODUCING FACTORS (IPF'S)

The following matrix is utilized to identify the environmental resources that could be impacted by these IPF's. An "x" has been marked for each IPF category that W&T has determined may impact a particular environmental resource as a result of the proposed activities. For those cells which are footnoted, a statement is provided as to the applicability of the proposed activities, and where there may be an effect, an analysis of the effect is provided.

| Environmental Resources | Emissions (air, noise, light, etc.) | Effluents (muds, cuttings, other discharges to the water column or seafloor) | Physical Disturbances To the seafloor (rig or anchor emplacement, etc.) | Wastes Sent to Shore for Treatment Or disposal | Accidents (e.g. oil spills, chemical spills, H2S releases) | Other IPF's identified |
|---|--|---|---|---|---|------------------------|
| Site Specific at Offshore Location | | | | | | |
| Designated topographic feature | | X | | | X | |
| Pinnacle Trend area live bottoms | | | | | | |
| Eastern Gulf live bottoms | | | | | | |
| Chemosynthetic communities | | | | | | |
| Water quality | | X | | | X | |
| Fisheries | | X | | | X | |
| Marine mammals | | X | | | X | |
| Sea turtles | | X | | | X | |
| Air quality | | | | | | |
| Shipwreck sites (known or potential) | | | | | | |
| Prehistoric archaeological sites | | | | | | |
| Vicinity of Offshore Location | | | | | | |
| Essential fish habitat | | | | | X | |
| Marine and pelagic birds | | | | | X | |
| Public health and safety | | | | | | |
| Coastal and Onshore | | | | | | |
| Beaches | | | | | | |
| Wetlands | | | | | | |
| Shorebirds and coastal nesting birds | | | | | | |
| Coastal wildlife refuges | | | | | | |
| Wilderness areas | | | | | | |
| Other Resources | | | | | | |
| | | | | | | |
| | | | | | | |

SECTION H

Environmental Impact Analysis-Continued

B. VICINITY OF OFFSHORE LOCATION ANALYSES

1. Designated Topographic Features

There are no anticipated planned effluents, physical disturbances to the seafloor, and accidents from the activities provided for in this Plan which could cause impacts to topographic features. The proposed surface disturbances are within the immediate vicinity of the Jakkula Bank (3-mile zone). The crests of designated topographic features in the northern Gulf are found below 10 m. In the event of an accidental oil spill from the proposed activities, the gravity of such oil (high gravity condensate and/or diesel fuel) would rise to the surface, quickly dissipate, and/or be swept clear by the currents moving around the bank; thereby avoiding the sessile biota.

2. Pinnacle Trend Live Bottoms

There are no anticipated effluents, physical disturbances to the seafloor, and accidents from the proposed activities that could cause impacts to a pinnacle trend area. The proposed surface disturbances within Ewing Bank Block 977 are located a significant distance (> 100 miles) from the closest pinnacle trend live bottom stipulated block. The crests of the pinnacle trend area are much deeper than 20 m. In the event of an accidental oil spill from the proposed activities, the gravity of such oil (high gravity condensate and/or diesel fuel) would rise to the surface, quickly dissipate, and/or be swept clear by currents moving around the bank; and thus not impacting the pinnacles.

3. Eastern Gulf Live Bottoms

There are no anticipated effluents, physical disturbances to the seafloor, and accidents from the proposed activities that could cause impacts to Eastern Gulf live bottoms. The proposed surface disturbances within Ewing Bank Block 977 are located a significant distance (>100 miles) from the closest pinnacle Eastern Gulf live bottom stipulated block. In the event of an accidental oil spill from the proposed activities, the gravity of such oil (high gravity condensate and/or diesel fuel) would rise to the surface, quickly dissipate, and/or be swept clear by currents moving around the bank; and would not be expected to cause adverse impacts to Eastern Gulf live bottoms because of the depth of the features and dilutions of spills.

4. Chemosynthetic Communities

Water depth at the existing surface location in Ewing Bank Block 977 is 550 feet. Therefore, the proposed activities are not located within the vicinity of any known chemosynthetic communities, which typically occur in water depths greater than 400 meters.

SECTION H

Environmental Impact Analysis-Continued

5. Water Quality

Accidental oil spill releases from the proposed activities, and cumulative similar discharge activity within the vicinity could potentially cause impacts to water quality. It is unlikely that an accidental oil spill release would occur from the proposed activities. In the event of such a 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.

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill. W&T will conduct the provided activities under EPA's Region VI NPDES General Permit GMG290000 which authorizes the discharge of certain effluents, subject to certain limitations, prohibitions and recordkeeping requirements. As such, it is not anticipated these discharges will cause significant adverse impacts to water quality.

6. Fisheries

Accidental oil spill releases from the proposed activities, and cumulative similar discharge activity within the vicinity may potentially cause some detrimental effects on fisheries. It is unlikely a spill would occur; however, such a release in open waters closed to mobile adult finfish or shellfish would likely be sublethal 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.

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill. W&T will conduct the proposed activities under EPA's Region VI NPDES General Permit GMG290000 which authorizes the discharge of certain effluents, subject to certain limitations, prohibitions and recordkeeping requirements. As such, it is not anticipated these discharges will cause significant adverse impacts to water quality.

7. Marine Mammals

As a result of the proposed activities, marine mammals may be adversely impacted by traffic, noise, accidental oil spills, cumulative similar discharge activity, and loss of trash and debris.

SECTION H

Environmental Impact Analysis-Continued

Chronic and sporadic sublethal 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 accidental oil spill, chance collisions with service vessels and ingestion of plastic material.

The net results 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, 1980). Collisions between cetaceans and ship could cause serious injury or death (Laist 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.

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill. W&T will conduct the proposed activities under EPA's Region VI NPDES General Permit GMG290000 which authorizes the discharge of certain effluents, subject to certain limitations, prohibitions and recordkeeping requirements. As such, it is not anticipated these discharges will cause significant adverse impacts to water quality. Additionally, W&T and its contractors will conduct the proposed activities under the additional criteria addressed by MMS in Notice to Lessee's (NTL's) 2003-G10 "Vessel Strike Avoidance and Injured/Dead Protective Species" and NTL 2003-G11 "Marine Trash & Debris Awareness & Elimination".

8. Sea Turtles

As a result of the proposed activities, sea turtles may be adversely impacted by traffic, noise, accidental oil spills, cumulative similar discharges, and loss of trash and debris. 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 drilling rigs, production facilities and service vessels. Drilling rigs and project vessels (construction barges) produce noise that could disrupt normal behavior patterns and crease some stress to sea turtles, making them more susceptible to disease. Accidental oil spill releases are potential threats which could have lethal effects on turtles. Contact and/or consumption of this released material could seriously affect individual sea turtles. Most OCS related impacts on sea turtles are expected to be sublethal. Chronic and/or avoidance of effected areas could cause declines in survival or productivity, resulting in gradual population declines.

SECTION H

Environmental Impact Analysis-Continued

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill. W&T will conduct the proposed activities under EPA's Region VI NPDES General Permit GMG290000 which authorizes the discharge of certain effluents, subject to certain limitations, prohibitions and recordkeeping requirements.

As such, it is not anticipated these discharges will cause significant adverse impacts to water quality. Additionally, W&T and its contractors will conduct the proposed activities under the additional criteria addressed by MMS in Notice to Lessee's (NTL's) 2003-G10 "Vessel Strike Avoidance and Injured/Dead Protective Species" and NTL 2003-G11 "Marine Trash & Debris Awareness & Elimination".

9. Air Quality

The proposed activities are located approximately 74 miles to the nearest shoreline. Air quality analyses of the proposed activities are below the MMS exemption level.

10. Shipwreck Site (Known or Potential)

There are no physical disturbances to the seafloor which could impact known or potential shipwreck sites, as the review of high resolution shallow hazards data indicate there are no known or potential shipwreck sites located within the surveyed area.

11. Prehistoric Archaeological Sites

There are no physical disturbances to the seafloor which could cause impacts to prehistoric archaeological sites, as the review of high resolution shallow hazards data and supporting studies did not reflect the occurrence of prehistoric archaeological sites.

Site Specific Offshore Location Analyses

1. Essential Fish Habitat

An accidental oil spill that may occur as a result of the proposed activities has potential to cause some detrimental effects on essential fish habitat. It is unlikely that an accidental oil spill release would occur; however, if a spill were to occur in close proximity to finfish or shellfish, the effects would likely be sublethal 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.

SECTION H

Environmental Impact Analysis-Continued

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

2. Marine and Pelagic Birds

An accidental oil spill that may occur as a result of the proposed activities has potential to impact marine and pelagic birds, by the birds coming into contact with the released oil. It is unlikely that an accidental oil spill release would occur.

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

3. Public Health and Safety Due to Accidents

There are no anticipated IPF's from the proposed activities that could impact the public health and safety. W&T has requested MMS approval to classify the proposed objective area as absent of hydrogen sulfide.

Coastal and Onshore Analyses

1. Beaches

Due to the distance from shore (74 miles), W&T does not anticipate that an accidental oil spill release from the provided activities could cause impacts to beaches; which is further based on the response capabilities that would be implemented. Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources.

SECTION H

Environmental Impact Analysis-Continued

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

2. Wetlands

Due to the distance from shore (74 miles), W&T does not anticipate that an accidental oil spill release from the provided activities could cause impacts to wetlands; which is further based on the response capabilities that would be implemented. Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources.

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

3. Shore Birds and Coastal Nesting Birds

Due to the distance from shore (74 miles), W&T does not anticipate that an accidental oil spill release from the provided activities could cause impacts to shore birds and coastal nesting birds; which is further based on the response capabilities that would be implemented. Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources.

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

4. Coastal Wildlife Refuges

Due to the distance from shore (74 miles), W&T does not anticipate that an accidental oil spill release from the provided activities could cause impacts to coastal wildlife refuges; which is further based on the response capabilities that would be implemented. Both historical spill data and the combined trajectory/risk calculations referenced in the

SECTION H

Environmental Impact Analysis-Continued

publication of OCS EIA /EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources.

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

5. Wilderness Areas

Due to the distance from shore (74 miles), W&T does not anticipate that an accidental oil spill release from the provided activities could cause impacts to wilderness areas; which is further based on the response capabilities that would be implemented. Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources.

In the event of an unanticipated blowout resulting in an oil spill, it is unlikely to have an impact based on the industry wide standards for using proven equipment and technology for such responses, implementation of W&T's Regional Oil Spill Response Plan which address available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

Other Identified Environmental Resources

W&T has not identified any other environmental resources other than those addressed above.

Impacts on Proposed Activities

No impacts are expected on the proposed activities as a result of taking into consideration the site specific environmental conditions.

A High Resolution Shallow Hazards Survey Report was compiled in accordance with NTL 98-20.

Based on the analysis of the referenced data, there are no surface or subsurface geological and manmade features and conditions that may adversely affect the provided activities. W&T will institute procedures to avoid pipelines and abandoned wells within the vicinity of the provided operations.

SECTION H

Environmental Impact Analysis-Continued

Alternatives

W&T did not consider any alternatives to reduce environmental impacts as a result of the proposed activities.

Mitigation Measures

W&T will not implement any mitigation measures to avoid, diminish, or eliminate potential environmental resources, other than those required by regulation and policy.

Consultation

W&T has not contacted any agencies or persons for consultation regarding potential impacts associated with the proposed activities. Therefore, a list of such entities is not being provided.

SECTION H

Environmental Impact Analysis-Continued

References

The following documents were utilized in preparing the Environmental Impact Assessment:

| <i>Document</i> | <i>Author</i> | <i>Dated</i> |
|--|-----------------------------|--------------|
| Shallow Hazards Survey Report | Peter Trabant | 2003 |
| MMS Environmental Impact Statement Report No. 2002-15 | Minerals Management Service | 2002 |
| NTL 2003-N06 "Supplemental Bond Procedures" | Minerals Management Service | 2003 |
| NTL 2004-G01 "Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program" | Minerals Management Service | 2004 |
| NTL 2003-G10 "Vessel Strike Avoidance and Injured/Dead Protective Species" | Minerals Management Service | 2003 |
| NTL 2003-G11 "Marine Trash & Debris Awareness & Elimination" | Minerals Management Service | 2003 |
| NTL 2002-G09 "Regional and Subregional Oil Spill Response Plans" | Minerals Management Service | 2002 |
| NTL 2003-G17 "Guidance for Submitting Exploration Plans and Development Operations Coordination Documents" | Minerals Management Service | 2003 |
| NTL 2005-G07 "Archaeological Resource Surveys and Reports" | Minerals Management Service | 2005 |
| NTL 2000-G16 "Guidelines for General Lease Surety Bonds" | Minerals Management Service | 2000 |
| NTL 98-20 "Shallow Hazards Survey Requirements" | Minerals Management Service | 1998 |
| NTL 98-16 "Hydrogen Sulfide Requirements" | Minerals Management Service | 1998 |
| NPDES General Permit GMG290000 | EPA - Region VI | 2004 |
| Regional Oil Spill Response Plan | W&T Offshore, Inc. | 2005 |

SECTION I

CZM Consistency

Under direction of the Coastal Zone Management Act (CMZA), 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.

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

W&T Offshore, Inc. has considered all of Louisiana's enforceable policies and certifies the consistency for the proposed operations.

Louisiana Coastal Zone Consistency Statement

**Attachment I-1
(Public Information)**

COASTAL ZONE MANAGEMENT CONSISTENCY CERTIFICATION

INITIAL DEVELOPMENT OPERATIONS
COORDINATION DOCUMENT

EWING BANK BLOCK 977

LEASE OCS-G 25081

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

By: W&T Offshore, Inc.

Signed By: *Janet Cole*

Dated: 11-16-05