

UNITED STATES GOVERNMENT
MEMORANDUM

May 27, 2026

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

Subject: Public Information copy of plan
Control # - N-10268
Type - Initial Development Operations Coordinations Document
Lease(s) - OCS-G37174 Block - 352 Eugene Island Area
OCS-G37175 Block - 353 Eugene Island Area
Operator - Arena Offshore, LP
Description - Transfer Structure to active lease & to Drill 2 Wells
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.

Tehirah Barkum
Plan Coordinator

Site Type/Name	Botm Lse/Area/Blk	Surface Location	Surf Lse/Area/Blk
FIXED/D		1295 FSL, 2378 FEL	G37175/EI/353
WELL/DA	G37174/EI/352	1295 FSL, 2378 FEL	G37175/EI/353
WELL/DB	G37174/EI/352	1295 FSL, 2378 FEL	G37175/EI/353



Arena Offshore, LP
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281-681-9501
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February 26, 2026

U.S. Department of the Interior
Bureau of Ocean Energy Management
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Attention: Michelle Uli-Picou
Chief, Plans Section

RE: Initial Development Operations Coordination Document for Leases OCS-G 37175/37174,
Eugene Island Blocks 353/352, OCS Federal Waters, Gulf of America, Offshore, Louisiana

Mrs. Picou:

In accordance with the provisions of Title 30 CFR 550, Subpart B and those certain Notice to Lessees (NTL) 2008-G04 and 2009-G27, Arena Offshore, LP (Arena) hereby submits for your review and approval an Initial Development Operations Coordination Document (Plan) for Leases OCS-G 37175/37174, Eugene Island Blocks 353/352, OCS Federal Waters, Gulf of America, Offshore, Louisiana.

Enclosed are Proprietary and Public Information copies of the Plan along with the applicable cost recovery fee.

Should you have questions or require additional information, please contact the undersigned at 281-210-3180 or adeady@arenaoffshore.com.

Sincerely,

Arena Offshore, LP

Aimee Deady

Aimee P. Deady
VP, Regulatory

:APD

Enclosures



Arena Offshore, LP
2103 Research Forest Drive, Suite 200
The Woodlands, Texas 77380

**Initial Development
Operations Coordination Document**

Eugene Island Blocks 353/352
Leases OCS-G 37175/37174

Aimee Deady
281-210-3180
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February 2026

Public Information

AMENDMENTS

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Attention: Michelle Uli-Picou
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Mrs. Picou:

In accordance with the provisions of Title 30 CFR 550, Subpart B and those certain Notice to Lessees (NTL) 2008-G04 and 2009-G27, Arena Offshore, LP (Arena) hereby submits for your review and approval an Initial Development Operations Coordination Document (Plan) for Leases OCS-G 37175/37174, Eugene Island Blocks 353/352, OCS Federal Waters, Gulf of America, Offshore, Louisiana.

Enclosed are Proprietary and Public Information copies of the Plan along with the applicable cost recovery fee.

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Sincerely,

Arena Offshore, LP

Aimee Deady

Aimee P. Deady
VP, Regulatory

:APD

Enclosures

- Mitigation Measures
- Consultation
- Preparer
- References

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SECTION 1 - PLAN CONTENTS (30 CFR Part 550.241)

Eugene Island Block 353, Lease OCS-G 37175 was acquired by Arena Energy, LLC at the Gulf of America Lease Sale No. 257 held on November 17, 2021. The Lease was issued with an effective date of October 1, 2022, and a primary term ending date of September 30, 2027. As of December 28, 2022, Arena Energy, LLC and Arena Offshore, LP were the record title interest holders, 98% and 2%, respectively. Also on this date, Arena Offshore, LP became the Designated Operator of all Lease OCS-G 37175. Arena Offshore, LP designated Cox Operating, L.L.C. an aliquot portion of this lease with depth limitations, SW1/4NW1/4SE1/4, on March 24, 2023.

Eugene Island Block 352, Lease OCS-G 37174 was acquired by Arena Energy, LLC at the Gulf of America Lease Sale No. 257 held on November 17, 2021. The Lease was issued with an effective date of October 1, 2022, and a primary term ending date of September 30, 2027. As of December 28, 2022, Arena Energy, LLC and Arena Offshore, LP were the record title interest holders, 98% and 2%, respectively. Also on this date, Arena Offshore, LP became the Designated Operator of all Lease OCS-G 37174.

Eugene Island Block 353, Platform D (Complex ID 23027-1) was installed by Chevron (Plan Control No. S-1300) in 1984. The previous operators performed development activities inclusive of drilling 15 of the 20 wells. Most recent Development Plans from these operators are:

- S-1300 – Supplemental DOCD – Install Platforms C and D and drill 27 wells in total.
- S-1567 – Supplemental DOCD – Activities to add 11 wells to Platforms C and D
- N-10226 – Transfer wells that bottomhole in newly acquired Lease OCS-G 37175, Eugene Island Block 353, and surface from Arena’s adjacent Lease OCS-G 37176, Eugene Island Block 354.
- S-8206 – Add additional bottomhole locations to Lease OCS-G 37175, Eugene Island Block 353, that surface from Arena’s adjacent Lease OCS-G 37176, Eugene Island Block 354..

Both Leases OCS-G 37175/37174, Eugene Island Block 353/352 are in their primary term.

Arena submits this Initial DOCD (Plan) (This will be the first Plan for EI 352):

1) Transfer Eugene Island Block 353, Platform D (Complex ID 23027-1) to Arena’s active Lease OCS-G 37175.

2) Drill two wells from existing open slots on Platform D (Complex ID 23027-1), complete, and produce the following locations from surface location Platform D in Lease OCS-G 37175, Eugene Island Block 353 with two (2) bottomhole locations in adjacent Lease OCS-G 37174, Eugene Island Block 352, as described in the below chart.

3) Arena is NOT asking to transfer any other well locations from Platform D, Complex ID 23027-1.

<i>BHL</i>	<i>Proposed BHL Lease</i>	<i>Surface Location Well Name</i>	<i>Well API</i>
Location DA	EI 352, G37174	Open Slot	TBD
Location DB	EI 352, G37174	Open Slot	TBD

SECTION 1 - PLAN CONTENTS (30 CFR Part 550.241)

Proposed operations will be conducted with a typical jack-up rig (WFD 400 or 450) equipped with surface blowout preventers. WFD rigs do not utilize equipment (e.g. moon pool, flexible lines/ropes) with potential for entanglement or entrapment of sea turtles or other marine life. Arena does not propose to install new pipelines that will make landfall. *Arena expects to commence these operations under this Plan as early as August 2026.*

New drill activities under this Plan will include pile-driving 24-48” drive pipe utilizing a hydraulic hammer to a depth of approximately 200-530 feet with an estimated 200-300 feet of penetration below mudline and a total of ±6 hours of hammer run time. Arena does not anticipate the incidental taking of any species as a result of pile driving activities and will conduct operations in accordance with the National Marine Fisheries Service Biological Opinion issued on March 13, 2020, updated 2021, 2022, and 2025. Mitigation measures for sea turtles will be in place with dedicated observers continuously monitoring a 157-meter visual radius around the rig during pile driving operations and will implement soft starts and shutdowns confirming no presence of sea turtles prior to continuing pile driving at recommended low energy and continue to monitor for presence of sea turtles during operations.

Details below describe pile driving activities:

Water Depth	~296-feet
Substrate Type(s)	Silt/mud
Number of piles to be driven - Open slots (2) - Size of piles (drive pipe) vary between 24 – 48 inches with sound source level for different steel pile size for each well (Reference: Biological Opinion, Section 8.5.4.1, Table 92)	Two (2) open slots (one pile per well)
Number of strikes per pile	~6,875 strikes
Number of days of pile driving / number of piles driven per day	.25 days/one pile
Number of strikes per foot to BML depth (or how many strikes it takes to drive to necessary depth BLM)	Average 27 strikes/foot
Whether hammer is operating (dry) or below (wet) the surface	Dry
Radial distance to injury and behavioral thresholds (if known)	Unknown
Noise attenuation proposed for use, if any	None

A. Plan Information Form

Included as *Attachment A* is Form BOEM 137 “OCS Plan Information Form” which provides information concerning the activities proposed under this Plan.

B. Location

Included as *Attachment B* is a location plat detailing the existing surface and proposed bottomhole locations as required by NTL 2008-G04.

SECTION 1 - PLAN CONTENTS (30 CFR Part 550.241)

A bathymetry map detailing the Eugene Island Block 353, Platform D surface location and is included as *Attachment C*.

C. Safety and Pollution Prevention Features

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

The offices of the Bureau of Ocean Energy Management (BOEM) and Bureau of Safety and Environmental Enforcement (BSEE) mandate the operations in this Plan comply with well control, pollution prevention, construction, welding procedures, safety and environmental related issue, et al; as described in various Subparts of Titles 30 CFR Parts 250 and 550; and as further clarified by applicable Notices to Lessees (NTL's). BSEE 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.

Arena's activities in this Plan will comply with the existing BOEM/BSEE regulations and NTL's implemented by the above listed agencies and Arena will adhere to the requirements set forth in the following document, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) as a result of the operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.

D. Storage Tanks and Production Vessels

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

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of Tanks	Total Capacity (bbls)	Fluid Gravity (API)
Fuel Oil	MODU	700	4	2800	No. 2 Diesel

SECTION 1 - PLAN CONTENTS

(30 CFR Part 550.241)

E. Pollution Prevention Measures

Additional measures initiated by Arena beyond those measures required by Title 30 CFR Part 250 may include any and/or all the following:

- A preliminary facility inspection by a contractor to ensure facility meets current regulatory requirements prior to commencement of operations
- Obtain historical performance history of the drill rig and/or production facility (if applicable).

F. Additional Measures

- Obtain historical performance history of the drilling and/or production contractor (if applicable).
- Safety and Environmental Briefings with offshore employee and contractor personnel to facility orientation and briefings on current operations.
- Review of Oil Spill Response Plan to ensure personnel are aware of the initial notifications and reporting requirements.
- Review of EPA NPDES General Permit with applicable personnel to ensure awareness of permit effluent limitations and reporting requirements.
- Pre-Spud and/or Pre-Production Start-Up Meetings with field personnel and contractors to discuss regulatory, environmental issues.
- SEMS Contractor Evaluations
- Safety Orientation Meetings
- Job Safety Analyses
- Management of Change Process

SECTION 2 - GENERAL INFORMATION (30 CFR Part 550.243)

A. Application and Permits

The following Federal/State applications will be submitted for the activities provided for in this Plan exclusive of EPA and COE general permits.

<i>Application/Permit</i>	<i>Issuing Agency</i>	<i>Status</i>
Application for Permit to Drill	BSEE District	Pending
Surface Safety System Modification	BSEE District	Pending
Surface Commingling/Measurement Modification	BSEE Regional	Pending

B. Drilling Fluids

Arena plans to use the following drilling fluids for the operations proposed under this Plan:

<i>Drilling Fluid Type</i>	<i>Estimated Volume of Drilling Fluid to be used Per Well</i>
Water-based (seawater, freshwater, barite)	4800 bbls
Synthetic-based (internal, olefin, ester)	2025 bbls

C. Production

Arena estimates the combined life of reserves for the proposed development activity to as follows:

<i>Hydrocarbon Type</i>	<i>Peak Production Rate</i>	<i>Average Production Rate</i>	<i>Life of Reservoir</i>

D. Oils Characteristics

According to NTL 2008-G04, oil characteristics information is not required for the proposed activities addressed in this Plan.

E. New or Unusual Technology

Arena does not plan or anticipate using any new or unusual technology as defined in Title 30 CFR 250.200 during the proposed activities addressed in this Plan. However, the best available and safest technologies (BAST), as currently referenced in Title 30 CFR Part 250 will be incorporated as a standard operational procedure and Arena will adhere to the requirements set forth in the following document, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) as a result of operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.

SECTION 2 - GENERAL INFORMATION

(30 CFR Part 550.243)

F. Bonding Statement

The general bond requirements for the activities and facilities proposed in this Plan are satisfied by an Areawide Development Bond, furnished and maintained according to Title 30 CFR Part 556, Subpart I; NTL No. 2015-N04, "General Financial Assurance". Additionally, BOEM has recently changed an internal policy and will no longer require additional security prior to the approval of Exploration and Development Plans; and will assess same at the actual permitting phase.

G. Oil Spill Financial Responsibility (OSFR)

According to Title 30 CFR Part 553, and NTL 2008-N05, "Guidelines for Oil Spill Financial Responsibility for Covered Facilities."; Arena Offshore, LP (Company No. 02628) will ensure demonstration of oil spill financial responsibility for the operations proposed in this Plan prior to commencing operations.

H. Deepwater Well Control Statement

According to NTL 2008-G04, a deepwater well control statement is not required for the activities proposed in this Plan.

I. Suspensions of Production

Arena does not anticipate a need to file a suspension of production for the subject leases since they are either being maintained by ongoing production operations or within the primary term.

J. Blowout Scenario

Arena will drill to the objective sands outlined in Geological and Geophysical Section of this Plan utilizing a typical structural, conductor, surface, and production casing program. If mandated by wellbore conditions, an intermediate casing string will be set prior to drilling through the objective sands. In the event of a blowout during the course of drilling open hole in the objective sands the wellbore would most likely bridge over in less than 1 day. Arena 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, Arena does not anticipate any delays in acquiring a jack-up type rig to conduct the proposed operations. Dependent upon the interval the well was drilled to, and potential interval for bridging over and surface intervention; if required, it could take at least 14 days to mobilize equipment and/or a rig to the field and perform a surface intervention or drill the relief well. Based on well intervention outlined in the potential worse-case discharge scenarios, the potential for drilling a relief well and a rig not being immediately available would be a total of 55 days and a potential total of 2,582,140 barrels during that time span.

SECTION 2 - GENERAL INFORMATION (30 CFR Part 550.243)

- Case 1. Well Bridging Over-** The GN-B Sand that will be encountered in the EI 352 "DB" Sand is unconsolidated. Productive zones require gravel packs for sand control. The GN-B completion in the offset EI 352 A001ST was gravel packed. It is anticipated that the severe drawdown resulting from a loss of well control will result in the hole bridging over in a matter of hours.
- Case 2. Conventional Surface Intervention –** It is assumed that a loss of well control from the surface will result in mobilizing 3rd party well control equipment to the rig. It is assumed that BOP's are compromised, that the rig has not caught fire and is capable of supporting well control efforts with the assistance of a support vessel. As an example, the intervention would consist of top killing the well with kill weight mud or possibly replacing the BOP's with another set to contain flow from the breached equipment.
- Case 3. Relief Well Intervention –** It is assumed that a rig is immediately available to mobilize to location to commence drilling a relief well. The mobilization and estimated time to drill the relief well is based on offset drilling performance curves.
- Case 4. Relief Well Intervention –** It is assumed that a rig is not immediately available to mobilize to location to commence drilling a relief well. The estimated time to mobilize a rig incorporates the suspension of activities by an Operator before the rig can be released for relief well operations. The time to drill the relief well is based on offset drilling performance curves.

Assess well condition:	2 days
Suspend current operations:	10 days
Mobilize rig:	3 days
<u>Drill relief well:</u>	<u>40 days</u>
Total:	55 days

Relief Rig Availability:

There are currently three (3) independent jack up rigs currently marketed in the Gulf of America that are capable of drilling an open water relief well to the Eugene Island Block 353, Platform D. Should the jack-up rig be damaged during the initial loss of well control, there are no offset platforms in the area that would be able capable of utilizing a platform rig to reach the bottomhole locations of the subject wellbores.

Arena does not anticipate any rig package constraints for this project.

SECTION 2 - GENERAL INFORMATION (30 CFR Part 550.243)

Blowout Prevention Measures

The purpose of this document is to describe measures that Arena will take, above and beyond what is detailed in BSEE Title 30 CFR Part 250, to enhance its ability to prevent a blowout, to reduce the likelihood of a blowout, and conduct effective and early intervention in the event of a blowout on the proposed well locations.

The following measures will be taken in order to ensure the proposed well locations are always kept under control:

- An Arena onsite representative will witness and review all BOP tests, casing tests and formation integrity tests.
- An Arena Superintendent in the office will review all FIT tests prior to moving forward with drilling operations.
- Prior to commencing cementing operations on any casing string, a minimum of 1½ bottoms up will be circulated with drilling mud, so long as full returns are maintained, in order enhance the ability of achieving a successful cement job.
- A liner top packer, in addition to cement, will be utilized to ensure the pressure integrity of the liner lap of any liner run in the well.
- All production casing strings will be centralized across hydrocarbon bearing zones to ensure the proper isolation of individual pay sands by cementation and to prevent the transmission of hydrocarbons up the annulus behind the production casing.
- The proposed well will be drilled on a mud weight schedule utilizing extensive offset data from offset wells in the field. Proposed drilling mud weights will allow for at a minimum, the known hydrostatic pressures required to drill the known hydrocarbon zones encountered in the original development of the field.
- Lost circulation material in the form of properly distributed particle sized mud additives (PSDs) will be added to the mud system in the form of sweeps while drilling both the intermediate and production hole sections. PSD additives will be utilized to prevent uncontrolled mud losses in the case that lower than anticipated pore pressures or fracture gradients are encountered.
- Wiper trips will be performed as hole conditions dictate to quantify the stability of the wellbore and determine if sufficient mud weights are being utilized to prevent influx of formation fluids, prevent swabbing of wellbore fluids while pulling pipe and prevent losses of wellbore fluids to the formation.
- Connections will be simulated while drilling into pressure transition areas to properly assess the current wellbore conditions.
- Mudloggers will be utilized during the drilling of the well to specifically evaluate wellbore conditions including but not limited to weights of returning drilling fluids as compared to that of the fluid entering the hole, gas content of mud returns, formation characteristics and abnormalities of cuttings and estimated paleo aging of cuttings.

SECTION 2 - GENERAL INFORMATION

(30 CFR Part 550.243)

- Logging while drilling tools (LWD) will be utilized to evaluate and estimate lithology, formation pressures and fluid content from surface casing point to wellbore total depth. This will enable the real time identification of any changes in anticipated formation pressures and assist in the picking of intermediate casing points and wellbore total depth, potentially eliminating the possibility of drilling into unexpected formations that could cause dangerous well control situations. Log data will be regularly provided to the office for evaluation.
- Pressure While Drilling (PWD) data will be utilized to ensure the stability of, and to maintain constant monitoring of hydrostatic pressures applied to the wellbore.

Blowout Intervention

In the event of an uncontrolled flow of hydrocarbons from these proposed operations described in this Plan, Arena's Regional Oil Spill Response Plan (OSRP) also described in this Plan will be activated. In addition to the activation of this Plan, two scenarios of well intervention have been described and current availability of equipment to enact both well intervention scenarios identified:

- Assuming in an uncontrolled flow situation, the MODU is intact and not sufficiently damaged, along with the wellbore and surface equipment, wellbore intervention would be performed from the MODU itself, or a barge mobilized nearby. Master Service Agreements (MSAs) have been established with Cudd Pressure Control and Wild Well Control to expedite response in the case of an uncontrolled flow situation. As an example, flow could be controlled from either a "top kill" method or from the removal of the surface BOP stack and subsequent replacement of the stack and the wellbore shut in.
- If the MODU and/or the wellbore are irreparably damaged during a blowout scenario, wellbore intervention would be performed by contracting an additional MODU, mobilizing it to location and the subsequent spudding and drilling of a relief well. Arena currently has in place established contracts with all contractors that operate jack-up rigs in the Gulf of America. Such contracts would be utilized to expedite the contracting of a rig to drill a relief well.

In the case of an uncontrolled flow of hydrocarbons, Arena would simultaneously pursue multiple wellbore intervention methods to mitigate and terminate the spill, until the wellbore is brought under control.

K. Chemical Products

According to NTL 2008-G04 information regarding products is not required to accompany EP's and DOCD's in the Gulf of America.

SECTION 3 - GEOLOGICAL & GEOPHYSICAL INFORMATION (30 CFR Part 550.244)

A. Geological Description

Included as *Attachment D* are the details of the geological targets and associated trapping features for the proposed well locations.

B. Structure Contour Maps

Included as *Attachment E* are current structure maps depicting the proposed bottomhole locations and applicable geological cross sections for the proposed well locations.

C. Interpreted 2-D and/or Seismic Lines

Included as *Attachment F* are deep seismic lines depicting the proposed well locations.

D. Geological Structure Cross-Sections

Interpreted geological cross sections depicting the proposed well locations and depths are included *Attachment G*.

E. Shallow Hazards Report

The activities proposed in this Plan will be conducted from previously approved existing surface locations in Eugene Island Block 353 (Plan Control No. S-1300) and therefore does not require an additional shallow hazards survey and report.

F. Shallow Hazards Assessment

The activities proposed in this Plan will be conducted from previously approved existing surface locations in Eugene Island Block 353 (Plan Control No. S-1300) and therefore does not require additional shallow hazards assessment.

G. High Resolution Seismic Lines

The activities proposed in this Plan will be conducted from a previously approved existing surface location, Eugene Island Block 353 (Plan Control No. S-1300), and therefore does not require additional high-resolution seismic lines.

H. Stratigraphic Column

Included as *Attachment H* are generalized biostratigraphic/lithostratigraphic columns depicting the proposed well locations from the seafloor to total depth with each objective horizon labeled.

I. Time vs. Depth Tables

Arena feels there is sufficient well control data for the target sand objectives provided for in this Plan as such seismic time vs. depth tables are not required.

SECTION 3 - GEOLOGICAL & GEOPHYSICAL INFORMATION

(30 CFR Part 550.244)

J. Geochemical Information

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

K. Future G&G Activities

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

SECTION 4 - HYDROGEN SULFIDE INFORMATION

(30 CFR Part 550.245)

A. Concentration

Arena does not anticipate encountering H₂S above the 20-ppm atmospheric level while conducting the proposed development operations provided under this Plan as detailed on *Attachment D*.

B. Classification

In accordance with Title 30 CFR 250.490(c), previous operators have received a classification of “H₂S absent” from BOEM for the area in which proposed drilling activities are to be conducted.

C. H₂S Contingency Plan

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

D. Modeling Report

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

**SECTION 5 - MINERAL RESOURCE CONSERVATION
INFORMATION
(30 CFR Part 550.246)**

A. Technology and Reservoir Engineering Practices and Procedures

Proprietary Information

B. Technology and Recovery Practices and Procedures

Proprietary Information

C. Reservoir Development

Proprietary Information

SECTION 6 - BIOLOGICAL, PHYSICAL & SOCIOECONOMIC INFORMATION (30 CFR Part 550.247)

A. High Density Deepwater Benthic Communities Information

NTL 2009-G40 broadened the scope of a chemosynthetic communities report to cover all high density deepwater benthic communities, changed the definition of deepwater from 400 meters (1312 feet) to 300 meters (984 feet), increased the separation distance from muds and cuttings discharge locations from 1500 feet to 200 feet, and provided for an additional 1000 feet buffer area beyond the maximum anchor areas.

The activities proposed in this Plan do not disturb seafloor areas in water depths greater than 300 meters (984 feet); therefore, chemosynthetic information is not required.

B. Topographic Features Map

BOEM 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 rig placement, and rig or construction base use of anchors, chains, cables, and wire ropes) within 305 meters (1000 feet) of a “No-Activity Zone” of a topographic feature.

If such proposed bottom disturbing activities are within 1000 feet of a no activity zone, the BOEM is required to consult with the NMFS.

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

C. Topographic Features Statement (Shunting)

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

D. Live Bottoms (Pinnacle Trend) Map

Certain leases are located in areas characterized by the existence of live bottoms. Live bottom (Pinnacle trend features) are small, isolated, low to moderate relief carbonate reef features or outcrops of unknown origin or hard substrates exposed by erosion that provide surface area for the growth of sessile invertebrates and attract large number of fish. Known features occur in an area of topographic relief in the northeastern portion of the western Gulf of America.

These leases would 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 BOEM Gulf of America OCS Region (GOMR) before you may conduct any drilling activities or install any structure, including lease term pipelines in accordance with NTL 2009-G39.

SECTION 6 - BIOLOGICAL, PHYSICAL & SOCIOECONOMIC INFORMATION (30 CFR Part 550.247)

The existing surface location in Eugene Island Block 353 is not located within 200 feet of any pinnacle trend feature with vertical relief equal to or greater than 8 feet; as such live bottom information is not required.

E. Live Bottoms (Low Relief) Map

Certain leases are located in areas characterized by the existence of live bottoms. Live bottom (Low relief features) are sea grass 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 a hard substrate and vertical relief may favor the accumulation of turtles, fishes or other fauna. These features occur in the Eastern Planning Area of the Gulf of America.

The existing surface location in Eugene Island Block 353 is not located within 200 feet of any pinnacle trend feature with vertical relief equal to or greater than 8 feet; as such live bottom (low relief) maps are not required.

F. Potentially Sensitive Biological Features Map

Oil and gas operations and transportation activities in the vicinity of potentially sensitive biological features may cause deleterious impacts to the sessile and pelagic communities associated with those habitats. Adverse impacts to the communities could be caused by mechanical damage from drilling rigs, platforms, pipelines and anchor employment.

The existing surface location in Eugene Island Block 353 is not located within 61 meters (200 feet) of potentially sensitive biological features; as such biologically sensitive maps are not required.

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

The BOEM revised Title 30 CFR Part 550, Subpart B to require lessees/operators to address the federally listed species with designated critical habitat as well as marine mammals which may be impacted by the proposed activities addressed under this Plan.

In accordance with Section 7 of the Endangered Species Act (ESA) and the Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program”, Appendices A, B, C and J, all federal agencies must ensure that any actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of a listed species or destroy or adversely modify its designated critical habitat.

SECTION 6 - BIOLOGICAL, PHYSICAL & SOCIOECONOMIC INFORMATION (30 CFR Part 550.247)

Included as *Attachment I* is a listing of the species under the jurisdiction of NOAA fisheries that are known to occur in the Gulf of America that may be affected by the proposed action.

Arena does not anticipate that the proposed activities will occur in the presence of federally listed threatened or endangered species and critical habitat designated under the Endangered Species Act (ESA) and marine mammals protected under the Marine Mammal Protection Act (MMPA). However, Arena will adhere to the requirements set forth in the following document, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) because of the operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.
- During pile driving activities mitigation measures for sea turtles will be in place with dedicated personnel continuously monitoring a 157-meter visual radius around the rig and will implement soft starts and shutdowns confirming no presence of sea turtles prior to continuing pile driving at recommended low energy and continue to monitor for presence of sea turtles during operations.

H. Archaeological Report

In accordance with NTL's 2011-JOINT-G01 and 2005-G07, Eugene Island Block 353 is located within an area requiring a 300-meter spacing survey. This requirement provides protection of prehistoric and historic archaeological resources by requiring remote sensing surveys in areas designated to have a high probability for archaeological resources.

Copies of these reports were previously submitted to the BOEM which provided for the now existing surface locations of Eugene Island Block 353, Platform D.

I. Air and Water Quality Information

According to NTL 2008-G04, air and water quality information is not required as the proposed activities provided for in this Plan do not impact the State of Florida.

K. Socioeconomic Information

According to NTL 2008-G04, socioeconomic information is not required as the proposed activities provided for in this Plan do not impact the State of Florida.

SECTION 7 - WASTES AND DISCHARGES INFORMATION (30 CFR Part 550.248)

A. Projected Generated Wastes

All projected solid and liquid wastes likely to be generated by our proposed activities are included in *Attachment J*. This attachment includes both operational wastes permitted by the appropriate NPDES General Permit GMG290269 and any other identified wastes.

Arena does not plan to treat, store or dispose of any of the above wastes down hole at our existing location.

B. Projected Ocean Discharges

All projected solid and liquid wastes likely to be generated by our proposed activities are included in *Attachment J*. This attachment includes both operational wastes permitted by the appropriate NPDES General Permit GMG290269 and any other identified wastes.

C. Modeling Report

According to NTL 2008-G04, a modeling report is not required for the operations proposed in this Plan.

D. NPDES Permits

According to NTL 2008-G04 information regarding NPDES permits is not required to accompany EP's or DOCD's in the Gulf of America.

E. Cooling Water Intakes

According to NTL 2008-G04 information regarding cooling water intakes is not required to accompany EP's or DOCD's in the Gulf of America.

SECTION 8 - AIR EMISSIONS INFORMATION (30 CFR Parts 550.249)

A. Emissions Worksheets and Screening Questions

The Projected Air Quality Emissions Report (Form BOEM-139) addresses the proposed drilling, completion and production activities proposed in this Plan.

As evidenced by *Attachment K*, the worksheets were completed based on the proposed activities being greater than 25 miles from shore and 200 kilometers from the Breton Wilderness Area.

B. Emissions Reduction Measures

The projected air emissions are within the exemption level; however, Arena utilizes ultra-low Sulphur fuel which is considered an emission reduction measure, and the factor has been adjusted in the worksheets.

C. Verification of Non-default Emission Factors

Arena has elected to use the default emission factors as provided in *Attachment K*.

D. Non-Exempt Activities

The proposed activities are within the exemption amount as detailed in *Attachment K*.

E. Modeling Report

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

SECTION 9 - OIL SPILLS INFORMATION (30 CFR Part 550.250)

A. Oil Spill Response Planning

All the proposed activities and facilities in this Plan will be covered by the Regional Oil Spill Response Plan filed by Arena Offshore, LP (BOEM Company No. 02628) in accordance with Title 30 CFR Part 254 and most recent biennial approved February 6, 2025, and an update approved May 13, 2025.

The following locations will be used in the event and oil spill occurs because of the proposed activities.

Primary Response Equipment Location	Pre-Planned Staging Location(s)
Leeville, Harvey, Venice, Vermilion LA	Fourchon or Cameron, LA

Arena 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.

Category	Regional OSRP WCD	DOCD WCD	Regional OSRP WCD	DOCD WCD
Type of Activity	Production > 10 miles from shore	Production > 10 miles from shore	Drilling > 10 miles from shore	Drilling > 10 miles from shore
Lease Number	OCS-G 00983	OCS-G 37175	OCS-G 05040	OCS-G 02115
Facility Location	EI 252	EI 353	EI 316	EI 353
Facility Designation	Platform L	Platform D	MODU/ EI 316, A004	MODU / Loc DB
Distance to Nearest Shoreline (miles)	51	77	68.8	77
Storage Tanks (total)	31	NA	317	NA
Lease Pipelines	164	NA	NA	NA
Uncontrolled Blowout (bbls)	10,957	2000	74,119	46,948
Total Volume (bbls)	11,152	2000	74,436	46,948
Type of Oil	Oil	Condensate	Condensate	Condensate
API Gravity	32°	40°	51°	40°

SECTION 9 - OIL SPILLS INFORMATION

(30 CFR Part 550.250)

Since Arena has the capability to respond to the appropriate worst-case spill scenario included in its Regional OSRP, most recent in-compliance on February 6, 2025 and updated May 13, 2025, and since the worst-case scenarios determined for our Plan does not replace the worst-case scenarios in our Regional OSRP, I hereby certify that Arena 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.

B. Oil Spill Response Discussion

In the event of an uncontrolled spill release resulting from the activities proposed in this Plan, Arena's Person-In-Charge on the platform/rig or the Shorebase Dispatcher 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. Arena's SMT Incident Command Center is located at O'Brien's Response Management, Inc.'s office in Houston, Texas.

Dependent upon the severity of the spill incident, a trajectory analysis would be conducted utilizing the BOEM 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.

Arena does not propose or anticipate New or Unusual Technology for oil spill detection, control or clean-up for operations proposed in this Plan.

Included as *Attachment L* is the oil spill response discussion, equipment deployment, and containment for the proposed development operations showing the capacity to respond to an oil spill during these operations.

C. Modeling Report

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

SECTION 9 - OIL SPILLS INFORMATION
(30 CFR Part 550.250)

D. NTL 2015-N01

The required data in NTL 2015-N01 and included as *Attachment M*, is being submitted to cover the worst-case discharge for the proposed operations in this Plan.

SECTION 10 - ENVIRONMENTAL MONITORING INFORMATION (30 CFR Part 550.252)

A. Monitoring Systems

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

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

B. Incidental Takes

The BOEM regulations in Title 30 CFR Part 550, Subpart B and the Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program”, Appendices A, B, C and J, require lessees/operators to provide for monitoring systems if the activities provided for in this Plan have the potential to result in an incidental take of any federally listed species and/or marine mammals.

Arena does not anticipate the incidental taking of any species because of the proposed activities. However, Arena will adhere to the requirements set forth in the following documents, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) because of the operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.
- BSEE’s Notice to Lessees NTL 2015-G03 “Marine Trash and Debris Awareness and Elimination”, and the recent National Marine Fisheries Service Biological Opinion issued on March 13, 2020 and updated in 2021, 2022, and 2025
- BOEM Notice to Lessees NTL 2016-G01 “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting”
- BOEM Notice to Lessees NTL 2016-G02 “Implementation of Seismic Mitigation Measures and Protected Species Observer Program”

SECTION 11 - LEASE STIPULATIONS/SPECIAL CONDITIONS INFORMATION (30 CFR Part 550.253)

Under the Outer Continental Shelf Lands Act, both BOEM and BSEE are 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.

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 BOEM, and other governing agencies and the Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program”, Appendices A, B, C and J.

The existing surface location in Eugene Island Block 353 (Lease OCS-G 37175) is subject to the following lease stipulations and special conditions:

- **Marine Protected Species**

The BOEM regulations in Title 30 CFR Part 550, Subpart B and the Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program”, Appendices A, B, C and J, require lessees/operators to provide for monitoring systems if the activities provided for in this Plan have the potential to result in an incidental take of any federally listed species and/or marine mammals.

Arena does not anticipate the incidental taking of any species as a result of the proposed activities. However, Arena will adhere to the requirements as set forth in the following documents, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) as a result of the operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.
- BSEE’s Notice to Lessees NTL 2015-G03 “Marine Trash and Debris Awareness and Elimination”, and the recent National Marine Fisheries Service Biological Opinion issued on March 13, 2020 and updated in 2021, 2022, and 2025
- BOEM Notice to Lessees NTL 2016-G01 “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting”
- BOEM Notice to Lessees NTL 2016-G02 “Implementation of Seismic Mitigation Measures and Protected Species Observer Program”

SECTION 11 - LEASE STIPULATIONS/SPECIAL CONDITIONS INFORMATION (30 CFR Part 550.253)

- **Military Warning Area**

The Military Area Stipulation reduces potential impacts, particularly regarding safety, but does not reduce or eliminate the actual physical presence of oil and gas operations in areas where military operations are conducted. As detailed in NTL 2014-G04, the existing surface disturbance in Eugene Island Block 353 is located within Military Warning Area W-59A. Therefore, in accordance with the requirements of the referenced stipulation, Arena will contact the Naval Air Station to coordinate and control the electromagnetic emissions during the proposed operations.

- **Archaeological Resources**

In accordance with NTL's 2011-JOINT-G01 and 2005-G07, Eugene Island Block 353 is located within an area requiring a 300-meter spacing survey. This requirement provides protection of prehistoric and historic archaeological resources by requiring remote sensing surveys in areas designated to have a high probability for archaeological resources.

Copies of these reports were previously submitted to the BOEM which provided for the now existing surface location of Eugene Island Block 353 Platform D.

- **Special Conditions**

The proposed surface disturbance activity in Eugene Island Block 353 Platform D will not be affected by any special conditions and/or multiple uses, such as designated shipping/anchorage areas, lightering zones, rigs-to-reef zone, and ordnance disposal zones.

SECTION 12 - ENVIRONMENTAL MITIGATION MEASURES INFORMATION (30 CFR Part 550.254)

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

The activities proposed in this Plan do not have an impact on the State of Florida; as such this section is not applicable.

B. Incidental Takes

BOEM regulations in Title 30 CFR Part 550, Subpart B and the Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program”, Appendices A, B, C and J, require lessees/operators to provide for monitoring systems if the activities provided for in this Plan have the potential to result in an incidental take of any federally listed species and/or marine mammals.

Arena does not anticipate the incidental taking of any species because of the proposed activities. However, Arena will adhere to the requirements set forth in the following documents, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) because of the operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.
- BSEE’s Notice to Lessees NTL 2015-G03 “Marine Trash and Debris Awareness and Elimination”, and the recent National Marine Fisheries Service Biological Opinion issued on March 13, 2020, updated in 2021, 2022 and 2025
- BOEM Notice to Lessees NTL 2016-G01 “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting”
- BOEM Notice to Lessees NTL 2016-G02 “Implementation of Seismic Mitigation Measures and Protected Species Observer Program”

SECTION 13 - DECOMMISSIONING INFORMATION

(30 CFR Part 550.255)

The information at Title 30 CFR Part 550.255 regarding decommissioning is not required to accompany EP's and DOCD's submitted for the Gulf of America.

**SECTION 14 - RELATED FACILITIES & OPERATION
INFORMATION
(30 CFR Part 550.256)**

A. Related OCS Facilities and Operations

The existing Eugene Island Block 353, Platform D was installed in 1984 and consists of 2-decks, 20 well slots, heliport and boat landing located in a water depth of ~296 feet. The well test facility will consist of a well manifold, test separator and fuel/instrument gas system. Wells produced in Eugene Island Block 352 will be individually tested on the Eugene Island Block 353, Platform D.

Liquids: Full stream production from the D Wells on Eugene Island Block 353, D will be combined into a common header, tested, and combined prior to exiting the facility via proposed 10-inch right-of-way pipeline (Segment No. TBD) to a series of existing pipelines for ultimate delivery to Operations System 36.0 or Operations System 26.0.

Gas: All combined gas production will exit the platform via proposed 8-inch right-of-way pipeline (Segment No. TBD) for ultimate delivery into Operation Systems 20.0 or 24.0. All production will be allocated back by individual meters and buy-back meters.

B. Transportation System

Arena does not anticipate installation of any new and/or modified onshore facilities to accommodate the additional production from the proposed operations provided for in this Plan.

C. Produced Liquid Hydrocarbon Transportation Vessels

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

SECTION 15 - SUPPORT VESSELS AND AIRCRAFT INFORMATION (30 CFR Part 550.257)

The rig, vessels, and supply boats utilized for proposed activities under this Plan will not transit the Rice’s whale moratoria area as noted within the National Marine Fisheries Service Biological Opinion issued March 13, 2020, updated in 2021, 2022 and 2025.

A. General

Personnel involved in the proposed operations will typically use their own vehicles as transportation to and from the selected onshore base; whereas the selected vendors will transport the equipment by a combination of trucks, boats and/or helicopters to the onshore base. The personnel and equipment will then be transported to the platform/rig taking the most direct route feasible as mandated by weather and traffic conditions. The table below provides for the maximum capacities, numbers and trip frequency used during the construction, drilling and production phases:

Type	Maximum Fuel Tank Storage Capacity	Maximum No. in Area at Any Time	Trip Frequency or Duration
Tugboats	3,000 bbls	1	Rig Mobilization
Supply Boats	500 bbls	1	Two trips per week
Crew Boat	500 bbls	1	Four trips per week
Aircraft	330 gals.	1	As needed

B. Diesel Oil Supply Vessels

The following table details the vessels to be used for purposes other than fuel (i.e., corrosion control):

Size of Fuel Supply Vessel	Capacity of Fuel Supply Vessel	Frequency of Fuel Transfers	Route Fuel Supply Vessel Will Take
180’ feet	1,500 bbls	Weekly	From the shorebase in Fourchon, LA to EI 353

C. Drilling Fluids Transportation

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

D. Solid and Liquid Wastes Transportation

Included as *Attachment J* is a listing of the solid and liquid wastes associated with the proposed activities in this Plan, detailing the types of waste and approximate composition, total amount, name and location, rate, and transport method.

SECTION 15 - SUPPORT VESSELS AND AIRCRAFT INFORMATION (30 CFR Part 550.257)

E. Vicinity Map

A Vicinity Plat detailing the surface location in Eugene Island Block 353 relative to the shoreline and onshore base is included as *Attachment N*.

SECTION 16 - ONSHORE SUPPORT FACILITIES INFORMATION (30 CFR Part 550.258)

A. General

The existing surface disturbance in Eugene Island Block 353 is located approximately 77 miles from the nearest Louisiana shoreline and 111 miles to the support base located in Fourchon, LA. Arena will utilize the onshore Westwind helipad located in New Iberia, Louisiana, if needed (approximately 129 miles).

Arena will utilize the existing shorebase located in Fourchon, LA during routine operations proposed in this Plan to accomplish the following:

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

B. Support Base Construction or Expansion

The proposed operations do not require any immediate action to acquire additional land or to expand existing base facilities.

C. Support Base Construction or Expansion Timetable

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

D. Waste Disposal

Included as *Attachment J* is a listing of waste disposal facilities to be utilized as part of the associated activities in this Plan; detailing the types of waste, amount, rate and disposal method to be sent to shore.

E. Air Emissions

According to NTL 2008-G04 information regarding air emissions generated by onshore support facilities is not required to accompany EP's and DOCD's for the Gulf of America.

F. Unusual Solid and Liquid Wastes

According to NTL 2008-G04 information regarding unusual solid and liquid wastes generated by onshore support facilities is not required to accompany EP's and DOCD's for the Gulf of America.

SECTION 17 - SULPHUR OPERATIONS INFORMATION

(30 CFR Part 550.259)

A. Bleedwater

Arena does not propose any Sulphur related operations during the activities proposed in this Plan.

B. Subsidence

Arena does not propose any Sulphur related operations during the activities proposed in this Plan.

SECTION 18 - COASTAL ZONE MANAGEMENT INFORMATION

(30 CFR Part 550.260)

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.

A. Consistency Certification

The proposed operation will require Coastal Zone Management Consistency for the State of Louisiana; included as *Attachment O*.

B. Other Information

According to NTL 2008-G04, this Section of the Plan is not applicable to the proposed operations.

SECTION 19 – ENVIRONMENTAL IMPACT ANALYSIS (30 CFR Part 550.261)

A. Impact Producing Factors (IPF's) From Proposed Activities

The following matrix is utilized to identify the affected environments that could be impacted by these IPF's. An "x" has been marked for each IPF category that Arena has determined may impact a particular environment 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	Impact Producing Factors (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 emplacement, etc.)	Wastes sent to shore for treatment or disposal	Accidents (e.g. oil spills, chemical spills, H ₂ S release)	Other IPFs you identify
<i>Site Specific at Offshore Location</i>						
Designated topographic features		(1)	(1)		(1)	
Pinnacle Trend area live bottoms		(2)	(2)		(2)	
Eastern Gulf live bottoms		(3)	(3)		(3)	
Chemosynthetic communities			(4)			
Water quality						
Fisheries						
Marine mammals	(8)				(8)	
Sea turtles	(8)				(8)	
Air quality	(9)					
Shipwreck sites (known or potential)			(7)			
Prehistoric archaeological sites			(7)			
<i>Vicinity of Offshore Location</i>						
Essential fish habitat					(6)	
Marine and pelagic birds						
Public health and safety					(5)	
<i>Coastal & Onshore</i>						
Beaches					(6)	
Wetlands					(6)	
Shorebirds and coastal nesting birds					(6)	
Coastal wildlife refuges						
Wilderness areas						

SECTION 19 – ENVIRONMENTAL IMPACT ANALYSIS

(30 CFR Part 550.261)

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 Gardens 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 Stipulation attached to an OCS lease.
2. Activities with any bottom disturbance within an OCS lease block protected through the Live Bottom (Pinnacle Trend) Stipulation attached to an OCS lease.
3. Activities within any Eastern Gulf OCS block where seafloor habitats are protected by the Live Bottom (Low-Relief) Stipulation attached to an OCS lease.
4. Activities on blocks designated by the BOEM as being in water depths 300 meters or greater.
5. Exploration or production activities where H₂S concentrations greater than 500 ppm might be encountered.
6. All activities that could result in an accidental spill of produced liquid hydrocarbons or diesel fuel that you determine would impact these environmental resources. If the proposed action is located a sufficient distance from a resource that no impact would occur, the EIA can note that in a sentence or two.
7. All activities that involve seafloor disturbances, including anchor emplacements, in any OCS block designated by the BOEM as having high-probability for the occurrence of shipwrecks or prehistoric sites, including such blocks that will be affected that are adjacent to the lease block in which your planned activity will occur. If the proposed activities are located a sufficient distance from a shipwreck or 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.

SECTION 19 – ENVIRONMENTAL IMPACT ANALYSIS (30 CFR Part 550.261)

B. Impact Analysis

Site Specific at Offshore Location

BOEM regulations in Title 30 CFR Part 550, Subpart B require lessees/operators to address the federally listed species with designated critical habitat as well as marine mammals which may be impacted by the proposed activities addressed under this Plan.

In accordance with Section 7 of the Endangered Species Act (ESA) and the Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program”, Appendices A, B, C and J, all federal agencies must ensure that any actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of a listed species, or destroy or adversely modify its designated critical habitat.

Endangered or Threatened species that may occur at the site-specific offshore location and/or along the northern Gulf of America coast are listed in *Attachment I* of this Plan.

Endangered or Threatened species listed under the Endangered Species Act (ESA), includes marine mammal species in the northern Gulf of America region which are protected under the Marine Mammal Protection Act (MMPA) and fall under the National Marine Fisheries Service (NMFS) jurisdiction for ESA-listed marine mammals (cetaceans), sea turtles in the marine environment, fish and invertebrate species.

Arena does not anticipate that the proposed activities will occur in the presence of federally listed threatened or endangered species and critical habitat designated under the Endangered Species Act (ESA) and marine mammals protected under the Marine Mammal Protection Act (MMPA) listed in *Attachment I*. However, Arena will adhere to the requirements set forth in the following document, as applicable, to avoid encounters or minimize impacts to any of the species listed in the Endangered Species Act (ESA) as a result of the operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.
- **Designation Topographic Features**

There are no anticipated emissions, effluents, physical disturbances to the seafloor, wastes transported to shore, and/or accidents from the proposed activities that could cause impacts to topographic features. The surface disturbance within Eugene Island Block 353 is located approximately 8 miles away from the Fishnet Bank. 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

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surface, quickly dissipate, and/or be swept clear by the currents moving around the bank; thereby avoiding the sessile biota.

- **Pinnacle Trend Area Live Bottoms**

There are no anticipated emissions, effluents, physical disturbances to the seafloor, wastes sent to shore, and/or accidents from the proposed activities that could cause impacts to a pinnacle trend area. The proposed surface disturbance within Eugene Island Block 353 is 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.

- **Eastern Gulf Live Bottoms**

There are no anticipated emissions, effluents, emissions physical disturbances to the seafloor, wastes sent to shore, and/or accidents from the proposed activities that could cause impacts to Eastern Gulf live bottoms. The proposed surface disturbance within Eugene Island Block 353 is 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.

- **Chemosynthetic Communities**

Water depth at the surface location in Eugene Island Block 353 is approximately 296 feet. Therefore, the proposed activities are not located within the vicinity of any known chemosynthetic communities, which typically occur in water depths greater than 300 meters. Based on the water depth, there are no anticipated emissions, effluents, emissions physical disturbances to seafloor, wastes sent to shore, and/or accidents from the proposed activities that could impact these types of communities.

- **Water Quality**

Routine operational discharges authorized by EPA's Region VI NPDES General Permit GMG290000 are regulated based on volume discharge rate limitations, and certain testing requirements for oil and grease and toxicity limitations. As such, it is not anticipated these discharges will cause significant adverse impacts to water quality.

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Accidental oil spill released 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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

- **General Underwater Noise**

The proposed activities for this Plan will be completed utilizing a Jack-up rig, support vessels and helicopters. Underwater noise levels produced by rig equipment and support vessel activity transmits directly to the water during drilling and maintenance operations but is a temporary disturbance. As a result, these sound sources are insignificant and not likely to adversely affect the endangered or threatened species that are known to occur in the Gulf of America.

Included as *Attachment I* of this Plan is a listing of endangered or threatened species under the jurisdiction of NOAA fisheries that are known to occur in the Gulf of America that may be affected by proposed action.

Arena does not anticipate that proposed activities in the Plan will occur in the presence of federally listed threatened or endangered species and critical habitat designated under the Endangered Species Act (ESA) and marine mammals protected under the Marine Mammal Protection Act (MMPA). However, Arena will adhere to the requirements set forth in the following document, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) as a result of operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.

- **Fisheries**

Accidental oil spill release 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 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.

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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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

Arena 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, and Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program", Appendices A, B, C and J. As such, it is not anticipated these discharges will cause significant adverse impacts to water quality.

Threatened Fish Species

As a result of the proposed offshore activities the following threatened and endangered fish species may be adversely impacted by emissions, effluents, waste sent to shore, noise, and/or accidents.

Giant Manta Ray –

The giant manta ray inhabits tropical, subtropical and temperate waters. Commercial fishing is the primary threat to giant manta rays which is caught as a bycatch. Offshore activities such as vessel presence and rig equipment noise can produce sounds at a frequency and intensity that could cause a behavioral change to the giant manta ray which has an approximate hearing frequency of 20 Hz. However, because of limited propagation distances of high SPL from proposed activities, impacts would be limited, and no population level impacts are expected.

Oceanic Whitetip Shark –

Oceanic whitetip sharks are found worldwide in offshore waters and is only occasionally reported in the Gulf of America. Commercial fishing pressure is the primary threat to the shark. Offshore activities such as vessel presence and rig equipment noise can produce sounds at a frequency and intensity that could cause a behavioral change to the oceanic whitetip shark which has an approximate hearing frequency of 20 Hz. However, because of limited propagation distances of high SPL from proposed activities, impacts would be limited, and no population level impacts are expected.

Gulf Sturgeon –

The gulf sturgeon resides primarily in inland estuaries and rivers from Louisiana to Florida and a small population of the species enters the Gulf of America seasonally in western Florida. The gulf sturgeon population has been depleted by fishing and shoreline development. Proposed offshore activities that could cause impacts to the gulf sturgeon include accidents (oil spills) and discarded trash and debris. It is unlikely that an accidental oil spill release would occur from proposed activities. In the event of such a release, Arena does not anticipate the effects from

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oil spills will diminish the value of the gulf sturgeon critical habitat; the proposed activities will be covered by Arena’s Regional OSRP. Trash and debris are not expected to impact the gulf sturgeon from proposed activities. Arena will operate in accordance with the regulations, agency guidance, Appendix “B” Section 7 of NMFS Endangered Species Act (ESA) Biological Opinion, and to the requirements set forth in BSEE’s Notice to Lessees NTL 2015-G03 “Marine Trash and Debris Awareness and Elimination”.

Nassau Grouper –

The Nassau grouper is one of the most common fish species in the coastal waters of the United States and has been subject to overfishing. The Nassau grouper is typically found in the shallow tropical waters of eastern Florida and the Florida Keys. There has been one confirmed sighting of Nassau grouper from the Flower Garden Banks in the Gulf of America and three additional reports from mooring buoys and the coral cap region of West Flower Garden flats. Proposed offshore activities that could cause impacts to the Nassau grouper include accidents (oil spills). It is unlikely that an accidental oil spill release would occur from proposed offshore activities. However, in the event of such a release Arena does not anticipate the effects from oil spills will diminish the value of the Nassau grouper critical habitat; the proposed activities will be covered by Arena’s Regional OSRP.

Smalltooth Sawfish –

The smalltooth sawfish live in shallow coastal waters in the Gulf of America, primarily in southwest Florida where several areas of critical habitat have been designated. Proposed offshore activities that could cause impacts to the smalltooth sawfish include accidents (oil spills). It is unlikely that an accidental oil spill release would occur from proposed offshore activities. However, in the event of such a release Arena does not anticipate the effects from oil spills will diminish the value of the smalltooth sawfish critical habitat; the proposed activities will be covered by Arena’s Regional OSRP.

Invertebrate Species –

There are seven known threatened coral species within the northern Gulf of America: rough cactus coral, pillar coral, lobed star coral, mountainous star coral, boulder star coral, staghorn coral, and elkhorn coral. None of these threatened species are expected to be present within the proposed offshore activities area, therefore should not be adversely affected by routine activities or accidental events.

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- **Marine Mammals**

As a result of the proposed activities, marine mammals may be adversely impacted by emissions, effluents, waste sent to shore, and/or accidents.

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 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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

Exposure to sound during rig pile driving activities could result in a temporary hearing loss or other behavioral responses in marine mammals, which could include local displacement from the area while pile driving activities occur. Section 7 of the Endangered Species Act (ESA) Biological Opinion concluded that potential impacts of this type of exposure are not anticipated to have adverse effects as whales are expected to be moving and less likely to remain stationary during pile driving activities.

Arena 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, and Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program", Appendices A, B, C and J. As such, it is not anticipated these discharges will cause significant adverse impacts to water quality.

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Additionally, Arena does not anticipate the incidental taking of any marine mammals as the result of the proposed activities. The proposed activities will be conducted by our company and its contractors and will adhere to the requirements set forth in the following documents, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) as a result of the operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.
 - BSEE’s Notice to Lessees NTL 2015-G03 “Marine Trash and Debris Awareness and Elimination”, and the recent National Marine Fisheries Service Biological Opinion issued on March 13, 2020, updated in 2021, 2022, and 2025
 - BOEM Notice to Lessees NTL 2016-G01 “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting”
 - BOEM Notice to Lessees NTL 2016-G02 “Implementation of Seismic Mitigation Measures and Protected Species Observer Program”
- **Sea Turtles**

As a result of the proposed activities, sea turtles may be adversely impacted by emissions, effluents, waste sent to shore, and/or accidents.

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 create some stress to sea turtles, making them more susceptible to disease. Accidental oil spill release 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 sub-lethal.

Chronic and/or avoidance of effected areas could cause declines in survival or productivity, resulting in gradual population declines.

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 Arena’s Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

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Exposure to sound during pile driving activities could result in a temporary hearing loss or other behavioral responses in sea turtles, which could include local displacement from the area while pile driving activities occur. Section 7 of the Endangered Species Act (ESA) Biological Opinion concluded that potential impacts of this type of exposure are not anticipated to be significant for adult sea turtles as noise from pile driving activities should provide warning to avoid the immediate area. However, juvenile sea turtles could be motivated to remain with the habitat and not leave the area, which could lead to hearing loss and adversely affected by being displaced from the habitat. Section 7 also states the annual total of predicted disturbances for juveniles is low. Arena’s contractors and company representative will provide mitigation measures with dedicated personnel to continuously monitor a visual radius around the rig and will implement soft starts and shutdowns during pile driving operations to help avoid encounters or minimize impacts.

Arena 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, and Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America, appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program”, Appendices A, B, C and J. As such, it is not anticipated these discharges will cause significant adverse impacts to water quality.

Additionally, Arena does not anticipate the incidental taking of any sea turtles as the result of the proposed activities. The proposed activities will be conducted by our company and its contractors and will adhere to the requirements as set forth in the following documents, as applicable, to avoid or minimize impacts to any of the species listed in the Endangered Species Act (ESA) as a result of the operations proposed in this Plan:

- Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America Appendices to the Programmatic Biological Opinion on the Gulf of America Oil and Gas Program.
- BSEE’s Notice to Lessees NTL 2015-G03 “Marine Trash and Debris Awareness and Elimination”, and the recent National Marine Fisheries Service Biological Opinion issued on March 13, 2020, updated in 2021, 2022, and 2025
- BOEM Notice to Lessees NTL 2016-G01 “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting”
- BOEM Notice to Lessees NTL 2016-G02 “Implementation of Seismic Mitigation Measures and Protected Species Observer Program”
- During pile driving activities mitigation measures for sea turtles will be in place with dedicated personnel continuously monitoring a visual radius around the rig and will implement soft starts and shutdowns confirming no presence of sea turtles prior to continuing pile driving at recommended low energy and continue to monitor for presence of sea turtles during operations

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- **Air Quality**

The proposed activities are located approximately 77 miles to the nearest Louisiana shoreline. There would be a limited degree of air quality degradation in the immediate vicinity of the proposed activities. Air quality analyses of the proposed activities are below the BOEM exemption level. As such, Arena does not anticipate any IPF's as a result of the proposed activities.

- **Shipwreck Sites (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. As such, Arena does not anticipate any IPF's as a result of the proposed activities.

- **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. As such, Arena does not anticipate any IPF's as a result of the proposed activities.

Vicinity of Offshore Location

- **Essential Fish Habitat**

As a result of the proposed activities, essential fish habitat may be adversely impacted by effluents and/or accidents.

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 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.

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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

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- **Marine and Pelagic Birds**

As a result of the proposed activities, marine and pelagic birds may be adversely impacted by an accidental oil spill, 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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

- **Public Health and Safety**

There are no anticipated emissions, effluents, wastes sent to shore, and/or accidents from the proposed activities that could cause impacts to the public health and safety. Arena received BOEM approval classifying the Eugene Island Block 353 area as absent of hydrogen sulfide per previous Plan approvals.

Coastal and Onshore

- **Beaches**

As a result of the proposed activities, beaches may be adversely impacted by an accidental oil spill. However, due to the distance from shore (approximately 77 miles to nearest Louisiana shoreline), and the response capabilities that would be implemented, no significant adverse impacts are expected. Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA BOEM 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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

- **Wetlands**

As a result of the proposed activities, wetlands may be adversely impacted by an accidental oil spill. However, due to the distance from shore (approximately 77 miles to the nearest Louisiana shoreline) and the response capabilities that would be implemented, no significant adverse impacts are expected. Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA BOEM 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources.

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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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

- **Shore Birds and Coastal Nesting Birds**

As a result of the proposed activities, shore birds and coastal nesting birds may be adversely impacted by an accidental oil spill. However, due to the distance from shore (approximately 77 miles to the nearest Louisiana shoreline) and the response capabilities that would be implemented, no significant adverse impacts are expected.

Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA BOEM 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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

- **Coastal Wildlife Refuges**

As a result of the proposed activities, coastal wildlife refuges may be adversely impacted by an accidental oil spill. However, due to the distance from shore (approximately 77 miles to the nearest Louisiana shoreline) and the response capabilities that would be implemented, no significant adverse impacts are expected.

Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA BOEM 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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

- **Wilderness Areas**

As a result of the proposed activities, wilderness areas may be adversely impacted by an accidental oil spill. However, due to the distance to the nearest area

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(approximately 77 miles to the nearest Louisiana shoreline) and the response capabilities that would be implemented, no significant adverse impacts are expected. Both historical spill data and the combined trajectory/risk calculations referenced in the publication of OCS EIA /EA BOEM 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 Arena's Regional Oil Spill Response Plan which addresses available equipment and personnel, techniques for containment and recovery, and removal of the oil spill.

- **Other Resources Identified**

Arena has not identified any other environmental resources other than those addressed above.

C. Impacts on Proposed Activities

Arena does not anticipate any impacts on the offshore site-specific locations, offshore vicinity, and/or coastal and onshore environmental conditions.

D. Environmental Hazards

Eugene Island Block 353 is not located within a geographic area impacted by strong environmental phenomena, other than potential hurricanes in the Gulf of America. The permanent structure has been designed to meet the current regulations and design criteria for these hurricane events. To mitigate potential impacts to the facility and/or wells during impending hurricanes, Arena will take precautionary measures to secure the facility, shutting in the wells and evacuating personnel for evacuation as further detailed in our U.S. Coast Guard Emergency Evacuation Plan.

E. Alternatives

There are no alternatives other than those required by regulation to be considered to reduce the environmental impacts of the activities proposed in this Plan.

F. Mitigation Measures

No mitigation measures other than those required by regulations will be considered to avoid, lessen or eliminate potential impacts on environmental resources.

G. Consultation

Arena 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.

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H. Preparer

Questions or requests for additional information should be made to Arena’s authorized representative/preparer of this Plan:

Aimee Deady
Arena Offshore, LP
2103 Research Forest Drive, Suite 200
The Woodlands, Texas 77380
281-210-3180 (Direct Office)
adeady@arenaoffshore.com

I. References

The following documents were utilized in preparing the Environmental Impact Assessment (though not necessarily cited in the document):

<i>Document</i>	<i>Author</i>	<i>Dated</i>
NTL 2005-G07 “Archaeological Resource Surveys and Reports”	Bureau of Ocean Energy Management	2005
NTL 2008-G05 “Shallow Hazards Program”	Bureau of Ocean Energy Management	2008
NTL 2008-N05 “Guidelines for Oil Spill Financial Responsibility (OSFR) for Covered Facilities	Bureau of Ocean Energy Management	2008
NTL 2009-G04 “Significant OCS Sediment Resources in the Gulf of America	Bureau of Ocean Energy Management	2009
NTL 2009-N11 “Air Quality Jurisdiction on the OCS”	Bureau of Ocean Energy Management	2009
NTL 2009-G26 “U.S. Air Force Communication Towers”	Bureau of Ocean Energy Management	2009
NTL 2009-G27 “Submitting Exploration Plans and Development Operations Coordination Documents”	Bureau of Ocean Energy Management	2009

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<i>Document</i>	<i>Author</i>	<i>Dated</i>
NTL 2009-G29 “Implementation Plan for Transition from North American Datum 27 to North American Datum 83	Bureau of Ocean Energy Management	2009
NTL 2009-G31 “Hydrogen Sulfide”	Bureau of Safety and Environmental Enforcement	2009
NTL 2009-G34 “Ancillary Activities”	Bureau of Ocean Energy Management	2009
NTL 2009-G40 “Deepwater Benthic Communities”	Bureau of Ocean Energy Management	2009
NTL 2009-G39 “Biologically-Sensitive Underwater Features and Areas”	Bureau of Ocean Energy Management	2010
NTL 2011-G01-JOINT “Revision to the List of OCS Lease Blocks Requiring Archaeological Resource Surveys and Reports”	Bureau of Ocean Energy Management/Bureau of Safety and Environmental Enforcement	2011
BSEE NTL 2015-G03 “Marine Trash & Debris Awareness & Elimination”	Bureau of Safety and Environmental Enforcement	2015
NTL 2014-G04 “Military Warning and Water Test Areas	Bureau of Ocean Energy Management	2014
NTL 2015-N01 “Information Requirements for Exploration Plans, Development & Production Plans, and Development Operations Coordination Documents on the OCS for Worst Case Discharge and Blowout Scenarios”	Bureau of Ocean Energy Management	2015
NTL 2015-N04 “General Financial Assurance”	Bureau of Ocean Energy Management	2015
NTL 2015-N06 “Procedures and Requirements for Right-of-Use and Easement Requests for Platforms, Artificial Island, Installations and Other Devices Attached to the Seabed”	Bureau of Ocean Energy Management	2015
NTL 2016-N01 – Requiring Additional Security	Bureau of Ocean Energy Management	2016
NTL 2016-G01 – Vessel Strike Avoidance and Injured/Dead Protected Species Reporting	Bureau of Ocean Energy Management	Reissued 2019

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<i>Document</i>	<i>Author</i>	<i>Dated</i>
NTL 2016-G02 “Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program”	Bureau of Ocean Energy Management	Reissued 2019
NPDES General Permit GMG290000	EPA – Region VI	2023
Title 30 CFR Part 550	Bureau of Ocean Energy Management	2026
Title 30 CFR Part 250	Bureau of Safety and Environmental Enforcement	2026
Regional Oil Spill Response Plan	J. Connor Consulting	2025
Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of America (FPR-2017-9234)	Office of Protected Resources, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce	2020, 2021, 2022, 2025

SECTION 20 - ADMINISTRATIVE INFORMATION (30 CFR Part 550.262)

A. Exempted Information Description (Public Information Copies Only)

Excluded from the Public Information copies are the following:

- a. Proposed bottomhole location information
- b. Proposed total well depths (measured and true vertical depth)
- c. Production Rates and Life of Reserves
- d. New and Unusual Technology
- e. Mineral Resource Conservation Information
- f. Geological and Geophysical Attachments
- g. Correlative well information used to justify H2S classification

B. Bibliography

The following documents were utilized in preparing the Plan:

<i>Document</i>	<i>Author</i>	<i>Dated</i>
Supplemental DOCD (Plan Control No. S-1300)	Chevron	1984
Revised DOCD (Plan Control No. R-1567)	Chevron	1985
Initial DOCD (Plan Control No. N-10226)	Arena Offshore	2023
Supplemental DOCD (Plan Control No. S-8206)	Arena Offshore	2025
Regional Oil Spill Response Plan	J. Connor Consulting	2025

OCS Plan Information Form

**Attachment A
(Public Information)**

OCS PLAN INFORMATION FORM

General Information									
Type of OCS Plan:	Exploration Plan (EP)		Development Operations Coordination Document (DOCD)					X	
Company Name: Arena Offshore, LP			BOEM Operator Number: 02628						
Address:			Contact Person: Aimee Deady						
2103 Research Forest Drive, Suite 200			Phone Number: 281-210-3180						
The Woodlands, Texas 77380			E-Mail Address: adeady@arenaoffshore.com						
If a service fee is required under 30 CFR 550.125(a), provide the				Amount paid	\$11,130	Receipt No.		27VV94AR	
Project and Worst Case Discharge (WCD) Information									
Lease(s): G37175/G37174		Area: EI 353/352	Block(s):	Project Name (If Applicable):					
Objective(s)	<input checked="" type="checkbox"/> Oil	<input checked="" type="checkbox"/> Gas	<input type="checkbox"/> Sulphur	<input type="checkbox"/> Salt	Onshore Support Base(s): Fourchon, Louisiana				
Platform/Well Name: D/Loc. DA/DB		Total Volume of WCD: 46,948 bbls				API Gravity: 40°			
Distance to Closest Land (Miles): 77 miles			Volume from uncontrolled blowout: 46,948 bbls						
Have you previously provided information to verify the calculations and assumptions for your WCD?							Yes	<input checked="" type="checkbox"/>	No
If so, provide the Control Number of the EP or DOCD with which this information was provided									
Do you propose to use new or unusual technology to conduct your activities?							Yes	<input checked="" type="checkbox"/>	No
Do you propose to use a vessel with anchors to install or modify a structure?							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
Description of Proposed Activities and Tentative Schedule (Mark all that apply)									
Proposed Activity			Start Date	End Date	No. of Days				
Exploration drilling									
Development drilling			8/01/2026	12/31/2029	180 total drilling days				
Well completion			included in above	included in above					
Well test flaring (for more than 48 hours)									
Installation or modification of structure									
Installation of production facilities									
Installation of subsea wellheads and/or manifolds									
Installation of lease term pipelines									
Commence production			10/01/2026	12/31/2032	6 years				
Other (Specify and attach description)									
Description of Drilling Rig				Description of Structure					
<input checked="" type="checkbox"/>	Jackup		Drillship		Caisson		Tension leg platform		
	Gorilla Jackup		Platform rig	<input checked="" type="checkbox"/>	Fixed platform		Compliant tower		
	Semisubmersible		Submersible		Spar		Guyed tower		
	DP Semisubmersible		Other (Attach Description)		Floating production system		Other (Attach Description)		
Drilling Rig Name (If Known):									
Description of Lease Term Pipelines									
From (Facility/Area/Block)		To (Facility/Area/Block)		Diameter (Inches)		Length (Feet)			

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): Platform D				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.		23027-1		
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): NA			For structures, volume of all storage and pipelines (Bbls): NA			API Gravity of fluid		NA	
Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)				
Lease No.	OCS G37175			OCS			OCS OCS			
Area Name	Eugene Island									
Block No.	353									
Blockline Departures (in feet)	N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L			
	1,294.99'						N/S Departure: F <u> </u> L			
	E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L			
	2,378.32'						E/W Departure: F <u> </u> L			
Lambert X-Y coordinates	X: 1,892,466.56'			X:			X:			
	Y: -192,766.99'			Y:			Y:			
Latitude/ Longitude	Latitude 28° 08' 10.4020" N			Latitude			Latitude			
	Longitude 91° 40' 00.5492" W			Longitude			Longitude			
Water Depth (Feet): 296'				MD (Feet):		TVD (Feet):		MD (Feet):		TVD (Feet):
Anchor Radius (if applicable) in feet:								MD (Feet):		TVD (Feet):
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)										
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor					
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						

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

Proposed Well/Structure Location										
Well or Structure Name/Number (If renaming well or structure, reference previous name): Location DA				Previously reviewed under an approved EP or DOCD?			Yes	<input checked="" type="checkbox"/>		No
Is this an existing well or structure?		Yes	No	If this is an existing well or structure, list the Complex ID or API No.						
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?							Yes	<input checked="" type="checkbox"/>		No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 46,948 bbls			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid		40°	
Surface Location				Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)			
Lease No.	OCS G37175			OCS			OCS OCS			
Area Name	Eugene Island									
Block No.	353									
Blockline Departures (in feet)	N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L		F <u> </u> L	
	1294.99'						N/S Departure: F <u> </u> L		F <u> </u> L	
	E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L		F <u> </u> L	
	2378.32'						E/W Departure: F <u> </u> L		F <u> </u> L	
Lambert X-Y coordinates	X: 1,892,466.56'			X:			X:		X:	
	Y: -192,766.99'			Y:			Y:		Y:	
Latitude/ Longitude	Latitude 28° 08' 10.4020" N			Latitude			Latitude		Latitude	
	Longitude 91° 40' 00.5492" W			Longitude			Longitude		Longitude	
Water Depth (Feet): 296'				MD (Feet):		TVD (Feet):		MD (Feet):		TVD (Feet):
Anchor Radius (if applicable) in feet:								MD (Feet):		TVD (Feet):
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)										
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor			
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					

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

Proposed Well/Structure Location										
Well or Structure Name/Number (If renaming well or structure, reference previous name): Location DB					Previously reviewed under an approved EP or DOCD?		Yes	<input checked="" type="checkbox"/>	No	
Is this an existing well or structure?		Yes	<input type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.					
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?							Yes	<input checked="" type="checkbox"/>	No	
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 46,948 bbls			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid		40°	
Surface Location				Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)			
Lease No.	OCS G37175			OCS			OCS OCS			
Area Name	Eugene Island									
Block No.	353									
Blockline Departures (in feet)	N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L			
	1294.99'						N/S Departure: F <u> </u> L			
	E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L			
	2378.32'						E/W Departure: F <u> </u> L			
Lambert X-Y coordinates	X: 1,892,466.56'			X:			X:			
	Y: -192,766.99'			Y:			Y:			
Latitude/ Longitude	Latitude 28° 08' 10.4020" N			Latitude			Latitude Latitude Latitude			
	Longitude 91° 40' 00.5492" W			Longitude			Longitude Longitude Longitude			
Water Depth (Feet): 296'				MD (Feet):		TVD (Feet):		MD (Feet):		TVD (Feet):
Anchor Radius (if applicable) in feet:							MD (Feet):		TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)										
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor			
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					
			X =		Y =					

Well Location Plat

**Attachment B
(Public Information)**

EI338

OCS-G-02118
Arena

EI339

OCS-G-02318
Arena



PROPOSED LOCATIONS NAD27 LOUISIANA SOUTH							
LOCATION	CALLNS	CALLEW	X COORDINATE	Y COORDINATE	LATITUDE	LONGITUDE	WD
Structure "D"	1,294.99' FSL	2,378.32' FEL	1,892,466.56'	-192,766.99'	28°08'10.4020"N	91°40'00.5492"W	296'
DA Surf.	1,294.99' FSL	2,378.32' FEL	1,892,466.56'	-192,766.99'	28°08'10.4020"N	91°40'00.5492"W	296'
DB Surf.	1,294.99' FSL	2,378.32' FEL	1,892,466.56'	-192,766.99'	28°08'10.4020"N	91°40'00.5492"W	296'

EI353

OCS-G-37175
Arena, Cox

EI352

OCS-G-37174
Arena



EI360

EI361



ARENA
OFFSHORE

**DEVELOPMENT OPERATIONS
COORDINATION DOCUMENT**
OCS-G-37174 / OCS-G-37175
BLOCK 352 AND 353 EUGENE ISLAND AREA
GULF OF AMERICA

Geodetic Datum: NAD27
Projection: LOUISIANA SOUTH
Grid Units: US SURVEY FEET

SCALE
1:24000

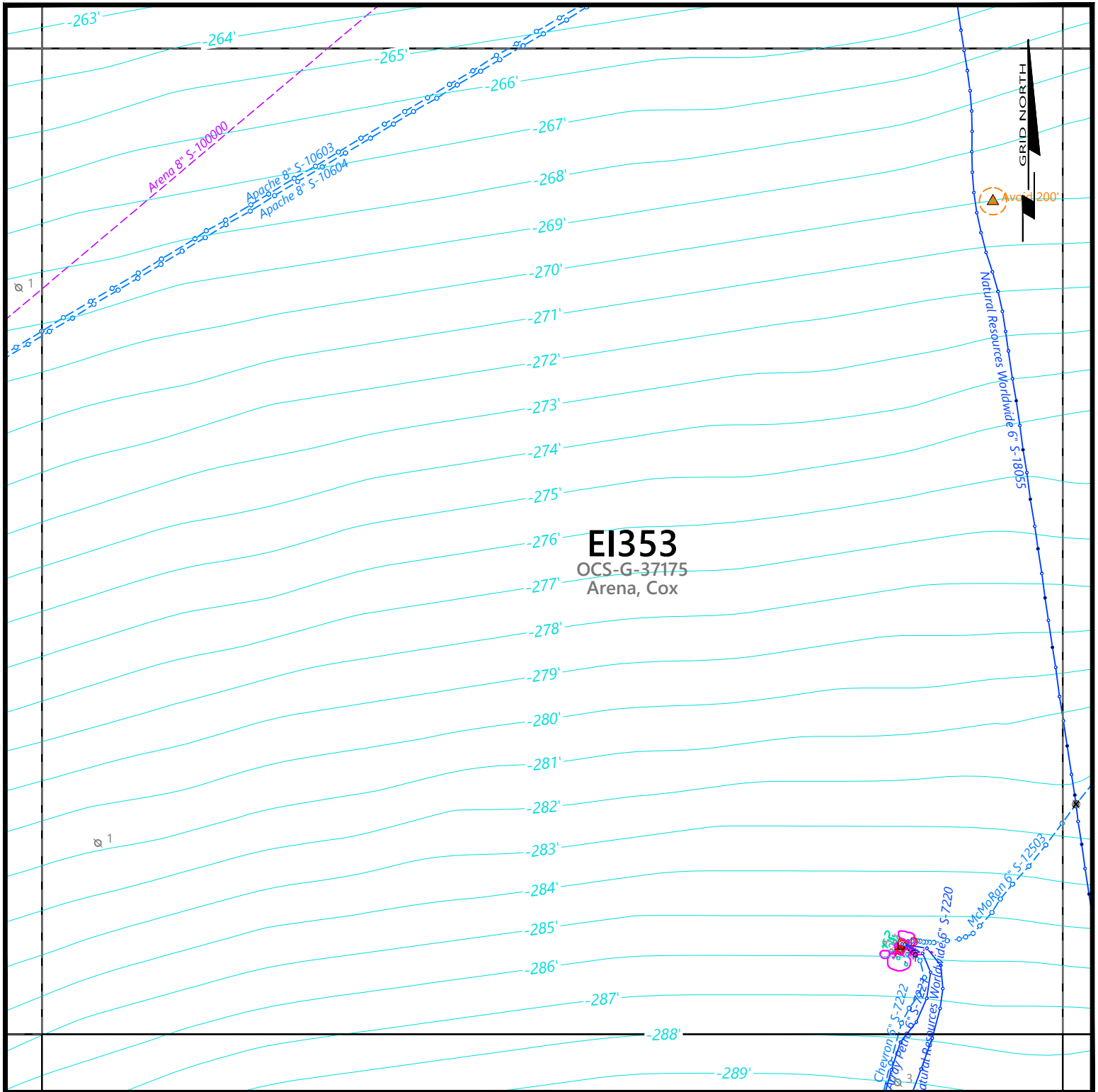


FUGRO USA MARINE, INC.
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Houston, Texas 77079 USA
(713) 346-3700

**PUBLIC
INFORMATION**

Bathymetry Map

**Attachment C
(Public Information)**



EI353
 OCS-G-37175
 Arena, Cox

LEGEND

STRUCTURE	HAZARD
PLATFORM	ANCH. PILE
(damaged/salv.)	OBSTRUCTION
WELL	USCG HAZARD
(damaged/salv.)	
PIPELINE	AVOIDANCE
ACTIVE	ANOMALY
OUT OF SERV.	CONTACT
ABANDONED	BUFFER
UN. CONST.	
PROPOSED	MOORING
PROP REM.	ANCH. ROPE
REMOVED	PROP. ROPE
POSITION	ANCH. / PILE
FEATURE	ANCH. BUOY
VALVE	
HUB	
CROSSING	

NOTES

1. THIS MAP WAS COMPILED USING IN-HOUSE DATA FROM VARIOUS SOURCES AND DOES NOT REPRESENT A FUGRO FIELD SURVEY.
2. BATHYMETRY TAKEN FROM NOAA SURVEYS. CONTOURS ARE SHOWN IN FEET, ARE GENERALIZED, AND ARE INTENDED TO BE USED FOR PRELIMINARY PLANNING ONLY AND NOT FOR FINAL FACILITIES SITING OR FINAL PIPELINE ROUTING.



**PLANNING MAP
 NOAA BATHYMETRY
 BLOCK 353
 EUGENE ISLAND AREA
 GULF OF AMERICA**

Geodetic Datum: NAD27
 Projection: LOUISIANA SOUTH
 Grid Units: US SURVEY FEET

SCALE
 1:24000

fugro FUGRO USA MARINE, INC.
 13501 Katy Freeway Suite 1050
 Houston, Texas 77079 USA
 (713) 346-3700

Geological Description

**Attachment D
(Proprietary Information)**

Structure Maps

**Attachment E
(Proprietary Information)**

Deep Seismic Lines

**Attachment F
(Proprietary Information)**

Cross Section Maps

**Attachment G
(Proprietary Information)**

Stratigraphic Column

**Attachment H
(Proprietary Information)**

NOAA Threatened/Endangered Species

**Attachment I
(Public Information)**



NOAA FISHERIES

Southeast Region Protected Resources Division

Gulf of Mexico's Threatened and Endangered Species

For more information on listed species please visit:
<http://www.nmfs.noaa.gov/pr/species/esa/listed.htm>
http://sero.nmfs.noaa.gov/protected_resources/index.html

Marine Mammal Species

	Scientific Name	Status
fin whale	<i>Balaenoptera physalus</i>	Endangered
sei whale	<i>Balaenoptera borealis</i>	Endangered
sperm whale	<i>Physeter macrocephalus</i>	Endangered
Gulf of Mexico Bryde's whale	<i>Balaenoptera edeni - subspecies</i>	Proposed - Endangered

Sea Turtle Species

green sea turtle	<i>Chelonia mydas</i>	Threatened ¹
hawksbill sea turtle	<i>Eretmochelys imbricata</i>	Endangered
Kemp's ridley sea turtle	<i>Lepidochelys kempii</i>	Endangered
leatherback sea turtle	<i>Dermochelys coriacea</i>	Endangered
loggerhead sea turtle	<i>Caretta caretta</i>	Threatened ²

Fish Species

Gulf sturgeon	<i>Acipenser oxyrinchus desotoi</i>	Threatened
Nassau grouper	<i>Epinephelus striatus</i>	Threatened
smalltooth sawfish	<i>Pristis pectinata</i>	Endangered ³
oceanic whitetip shark	<i>Carcharhinus longimanus</i>	Threatened
giant manta ray	<i>Manta birostris</i>	Threatened

Invertebrate Species

rough cactus coral	<i>Mycetophyllia ferox</i>	Threatened ⁴
pillar coral	<i>Dendrogyra cylindrus</i>	Threatened ⁴
lobed star coral	<i>Orbicella annularis</i>	Threatened
mountainous star coral	<i>Orbicella faveolata</i>	Threatened
boulder star coral	<i>Orbicella franksi</i>	Threatened
staghorn coral	<i>Acropora cervicornis</i>	Threatened ⁴
elkhorn coral	<i>Acropora palmata</i>	Threatened ⁵

¹ North Atlantic and South Atlantic Distinct Population Segments.

² Northwest Atlantic Distinct Population Segment.

³ U.S. Distinct Population Segment

⁴ Colonies located at Dry Tortugas National Park.

⁵ Colonies located at Flower Garden Banks National Marine Sanctuary and Dry Tortugas National Park.



NOAA FISHERIES

Southeast Region

Protected Resources Division

Critical Habitat Designations

For final rules, maps, and GIS data please visit:

http://sero.nmfs.noaa.gov/maps_gis_data/protected_resources/critical_habitat/index.html

Loggerhead sea turtle: There are 38 designated marine areas that occur throughout the Southeast Region.

Gulf sturgeon: There are 14 marine and estuarine units located in Northwest Florida, Alabama, Mississippi, and eastern Louisiana.

Smalltooth sawfish: There are two habitat units located in Charlotte Harbor and in the Ten Thousand Islands/Everglades, Florida.

Species Proposed for Listing Under the Endangered Species Act

Federal action agencies are encouraged to include species proposed for listing under the Endangered Species Act (ESA) in their Section 7 consultation requests. Species that are proposed for listing are those which have been found to warrant federal protection under the ESA, but a final rule formally listing the species has not yet published. By including these species in your Section 7 consultation, reinitiating consultation after the ESA listing is finalized may not be necessary.

For more information on species proposed for listing under the ESA, please visit:

<http://www.nmfs.noaa.gov/pr/species/esa/candidate.htm#proposed>

Waste Tables

**Attachment J
(Public Information)**

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

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

Projected generated waste			Projected ocean discharges		Projected Downhole Disposal
Type of Waste and Composition	Composition	Projected Amount	Discharge rate	Discharge Method	Answer yes or no
Will drilling occur ? If yes, you should list muds and cuttings					
Water-based drilling fluid	barite, additives	4800 bbls/well	1025 bbls/day/well	discharge overboard	No
Cuttings wetted with water-based fluid	water-based fluids	2100 bbls/well	525 bbls/day/well	discharge overboard	No
Cuttings wetted with synthetic-based fluid	Cuttings generated while using synthetic based drilling fluid.	2025 bbls/well	225 bbls/day/well	Shunt through downpipe	No
Brine	Brine	0 bbls total	0 bbl/hr	discharge overboard	
Will humans be there? If yes, expect conventional waste					
Domestic waste (kitchen water, shower water)	grey water	30 gallons/person/day	NA	Remove floating solids and discharge	No
Sanitary waste (toilet water)	treated sanitary waste	20 gallons/person/day	NA	Chlorinate and discharge	No
Is there a deck? If yes, there will be Deck Drainage					
Deck Drainage	wash water and rainwater	1000 bbl (dependent on rainfall)	15 bbl/hr	discharge overboard	No
Will you conduct well treatment, completion, or workover?					
well treatment fluids	NA	NA	NA	NA	NA
well completion fluids	Calcium or Sodium Chloride	200 bbls/well	25 bbls/hr (1 day per well)	NA	NA
workover fluids	NA	NA	NA	NA	NA
Miscellaneous discharges. If yes, only fill in those associated with your activity.					
Desalinization unit discharge	Seawater	NA	NA	NA	NA
Blowout prevent fluid	NA	NA	NA	NA	NA
Ballast water	NA	NA	NA	NA	NA
Bilge water	NA	NA	NA	NA	NA
Excess cement at seafloor	NA	NA	NA	NA	NA
Fire water	Seawater	NA	NA	NA	NA
Cooling water	Seawater	NA	NA	NA	NA
Will you produce hydrocarbons? If yes fill in for produced water.					
Produced water	formation water	100 bbls	None	discharge overboard	No
Will you be covered by an individual or general NPDES permit ?			GENERAL PERMIT	GMG290269	

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

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

Projected generated waste		Solid and Liquid Wastes transportation	Waste Disposal		
Type of Waste	Composition	Transport Method	Name/Location of Facility	Amount	Disposal Method
Will drilling occur ? If yes, fill in the muds and cuttings.					
Oil-based drilling fluid or mud	NA	NA	NA	NA	NA
Synthetic-based drilling fluid or mud	use SBF and additives	cutting boxes on supply boat	Newpark Environmental in Abbeville, LA	2025 bbls/well	Recycled
Cuttings wetted with Water-based fluid	NA	NA	NA	NA	NA
Cuttings wetted with Synthetic-based fluid	NA	NA	NA	NA	NA
Cuttings wetted with oil-based fluids	NA	NA	NA	NA	NA
Will you produce hydrocarbons? If yes fill in for produced sand.					
Produced sand	NA	NA	NA	NA	NA
Will you have additional wastes that are not permitted for discharge? If yes, fill in the appropriate rows.					
trash and debris	trash and debris	storage bins on supply boat	EPS Dock Fourchon, LA	500 cu ft total	landfill
used oil	NA	drums on supply boats	NA	NA	NA
wash water	NA	NA	NA	NA	NA
chemical product wastes	NA	NA	NA	NA	NA

Air Quality Emissions Report

**Attachment K
(Public Information)**

COMPANY	Arena Offshore, LP
AREA	Eugene Island
BLOCK	353
LEASE	G37175
FACILITY	D (Complex ID #23027)
WELL	
COMPANY CONTACT	Aimee Deady
TELEPHONE NO.	281-210-3180
REMARKS	Drill Well Locations DA and DB

LEASE TERM PIPELINE CONSTRUCTION INFORMATION:		
YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS
2026		none
2027		
2028		
2029		
2030		
2031		
2032		
2033		
2034		
2035		

AIR EMISSIONS COMPUTATION FACTORS

Fuel Usage Conversion Factors	Natural Gas Turbines		Natural Gas Engines		Diesel Recip. Engine		Diesel Turbines	
	SCF/hp-hr	9.524	SCF/hp-hr	7.143	GAL/hp-hr	0.0514	GAL/hp-hr	0.0514

Equipment/Emission Factors	units	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	REF.	DATE	Reference Links
Natural Gas Turbine	g/hp-hr		0.0086	0.0086	0.0026	1.4515	0.0095	N/A	0.3719	N/A	AP42 3.1-1& 3.1-2a	4/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf
RECIP. 2 Cycle Lean Natural Gas	g/hp-hr		0.1293	0.1293	0.0020	6.9998	0.4082	N/A	1.2009	N/A	AP42 3.2-1	7/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s02.pdf
RECIP. 4 Cycle Lean Natural Gas	g/hp-hr		0.0002	0.0002	0.0020	2.8814	0.4014	N/A	1.8949	N/A	AP42 3.2-2	7/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s02.pdf
RECIP. 4 Cycle Rich Natural Gas	g/hp-hr		0.0323	0.0323	0.0020	7.7224	0.1021	N/A	11.9408	N/A	AP42 3.2-3	7/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s02.pdf
Diesel Recip. < 600 hp	g/hp-hr	1	1	1	0.0279	14.1	1.04	N/A	3.03	N/A	AP42 3.3-1	10/96	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s03.pdf
Diesel Recip. > 600 hp	g/hp-hr	0.32	0.182	0.178	0.0055	10.9	0.29	N/A	2.5	N/A	AP42 3.3-1	10/96	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s04.pdf
Diesel Boiler	lbs/bbl	0.0840	0.0420	0.0105	0.0089	1.0080	0.0084	5.14E-05	0.2100	0.0336	AP42 1.3-6; Pb and NH3: WebFIRE (08/2018)	9/98 and 5/10	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s04.pdf https://cfpub.epa.gov/webfire/
Diesel Turbine	g/hp-hr	0.0381	0.0137	0.0137	0.0048	2.7941	0.0013	4.45E-05	0.0105	N/A	AP42 3.1-1 & 3.1-2a	4/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf
Dual Fuel Turbine	g/hp-hr	0.0381	0.0137	0.0137	0.0048	2.7941	0.0095	4.45E-05	0.3719	0.0000	AP42 3.1-1& 3.1-2a; AP42 3.1-1 & 3.1-2a	4/00	https://www3.epa.gov/ttnchie1/ap42/ch03/final/c03s01.pdf https://cfpub.epa.gov/webfire/
Vessels – Propulsion	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEITSP refer to Diesel Recip. > 600 hp reference	3/19	https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-net-data
Vessels – Drilling Prime Engine, Auxiliary	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEITSP refer to Diesel Recip. > 600 hp reference	3/19	
Vessels – Diesel Boiler	g/hp-hr	0.0466	0.01491	0.0147	0.0047	1.4914	0.0820	3.73E-05	0.1491	0.0003	USEPA 2017 NEITSP (units converted) refer to Diesel Boiler Reference	3/19	
Vessels – Well Stimulation	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEITSP refer to Diesel Recip. > 600 hp reference	3/19	
Natural Gas Heater/Boiler/Burner	lbs/MMscf	7.60	1.90	1.90	0.60	190.00	5.50	5.00E-04	84.00	3.2	AP42 1.4-1 & 1.4-2; Pb and NH3: WebFIRE (08/2018)	7/98 and 8/18	https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s04.pdf https://cfpub.epa.gov/webfire/
Combustion Flare (no smoke)	lbs/MMscf	0.00	0.00	0.00	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
Combustion Flare (light smoke)	lbs/MMscf	2.10	2.10	2.10	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	https://www3.epa.gov/ttnchie1/ap42/ch13/final/C13S05_02-05-18.pdf
Combustion Flare (medium smoke)	lbs/MMscf	10.50	10.50	10.50	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
Combustion Flare (heavy smoke)	lbs/MMscf	21.00	21.00	21.00	0.57	71.40	35.93	N/A	325.5	N/A	AP42 13.5-1, 13.5-2	2/18	
Liquid Flaring	lbs/bbl	0.42	0.0966	0.0651	5.964	0.84	0.01428	5.14E-05	0.21	0.0336	AP42 1.3-1 through 1.3-3 and 1.3-6	5/10	https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s03.pdf
Storage Tank	tons/yr/tank								4.300		2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	https://www.boem.gov/environment/environmental-studies/2014-gulfwide-emission-inventory
Fugitives	lbs/hr/component								0.0005		API Study	12/93	https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-net-data
Glycol Dehydrator	tons/yr/dehydrator								19.240		2011 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2014	https://www.boem.gov/environment/environmental-studies/2011-gulfwide-emission-inventory
Cold Vent	tons/yr/vent								44.747		2014 Gulfwide Inventory; Avg emiss (upper bound of 95% CI)	2017	https://www.boem.gov/environment/environmental-studies/2014-gulfwide-emission-inventory
Waste Incinerator	lb/ton		15.0	15.0	2.5	2.0	N/A	N/A	20.0	N/A	AP 42 2.1-12	10/96	https://www3.epa.gov/ttnchie1/ap42/ch02/final/c02s01.pdf
On-Ice – Loader	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Other Construction Equipment	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Other Survey Equipment	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	https://www.epa.gov/moves/nonroad2008a-installation-and-updates
On-Ice – Tractor	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Truck (for gravel island)	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
On-Ice – Truck (for surveys)	lbs/gal	0.043	0.043	0.043	0.040	0.604	0.049	N/A	0.130	0.003	USEPA NONROAD2008 model; TSP (units converted) refer to Diesel Recip. <600 reference	2009	
Man Camp - Operation (max people/day)	tons/person/day		0.0004	0.0004	0.0004	0.006	0.001	N/A	0.001	N/A	BOEM 2014-1001	2014	https://www.boem.gov/sites/default/files/uploadedFiles/BOEM/BOEM_Newsroom/Library/Publications/2014-1001.pdf
Vessels - Ice Management Diesel	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEITSP refer to Diesel Recip. > 600 hp reference	3/19	https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-net-data
Vessels - Hovercraft Diesel	g/hp-hr	0.320	0.1931	0.1873	0.0047	7.6669	0.2204	2.24E-05	1.2025	0.0022	USEPA 2017 NEITSP refer to Diesel Recip. > 600 hp reference	3/19	

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

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

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

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

AIR EMISSIONS CALCULATIONS - 1ST YEAR

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL	CONTACT	PHONE	REMARKS																	
Arena Offshore, LP	Eugene Island	353	G37175	D (Complex ID #23027)		Aimee Deady	281-210-3180	Drill Well Locations DA and DB																	
OPERATIONS	EQUIPMENT	EQUIPMENT ID	RATING	MAX. FUEL	ACT. FUEL	RUN TIME	MAXIMUM POUNDS PER HOUR										ESTIMATED TONS								
	Diesel Engines		HP	GAL/HR	GAL/D		TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	
	Nat. Gas Engines		HP	SCF/HR	SCF/D																				
	Burners		MMBTU/HR	SCF/HR	SCF/D	HR/D	D/YR																		
DRILLING	VESSLS- Drilling - Propulsion Engine - Diesel		8800	452.7248	10865.40	24	152	6.21	3.75	3.63	0.09	148.74	4.28	0.00	23.33	0.04	11.32	6.83	6.63	0.16	271.31	7.80	0.00	42.55	0.08
WFD 400/450	VESSLS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSLS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSLS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSLS - Diesel Boiler		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Vessels - Drilling Prime Engine, Auxiliary		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PIPELINE INSTALLATION	VESSLS - Pipeline Laying Vessel - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSLS - Pipeline Burying - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FACILITY INSTALLATION	VESSLS - Heavy Lift Vessel/Derrick Barge Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PRODUCTION	RECIP.-600hp Diesel (50 kw temp diesel rental generator)	DAN-001	67	3.446882	82.73	24	365	0.15	0.15	0.15	0.00	2.08	0.15	--	0.45	--	0.65	0.65	0.65	0.02	9.12	0.67	--	1.96	--
	RECIP.-600hp Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	VESSLS - Shuttle Tankers		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Well Stimulation		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	Diesel Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	Dual Fuel Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 2 Cycle Lean Natural Gas		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	RECIP. 4 Cycle Lean Natural Gas		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	RECIP. 4 Cycle Rich Natural Gas (250 kw generator #1)		335	2392.8571	57428.57	24	365	--	0.02	0.02	0.00	5.70	0.08	--	8.82	--	--	0.10	0.10	0.01	24.98	0.33	--	38.63	--
	RECIP. 4 Cycle Rich Natural Gas (250 kw generator #2)		335	2392.8571	57428.57	24	365	--	0.02	0.02	0.00	5.70	0.08	--	8.82	--	--	0.10	0.10	0.01	24.98	0.33	--	38.63	--
	Diesel Boiler		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Heater/Boiler/Burner		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MISC.		BPD	SCF/HR	COUNT																				
	STORAGE TANK		0	0	0	0	0	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	--
	COMBUSTION FLARE - no smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - light smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - medium smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - heavy smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COLD VENT (Vent Boom)		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	FUGITIVES		0	0	1	24	365	--	--	--	--	10.22	--	--	--	--	--	--	--	--	44.75	--	--	--	--
	GLYCOL DEHYDRATOR		0	0	2013	24	365	--	--	--	--	1.01	--	--	--	--	--	--	--	--	4.41	--	--	--	--
	WASTE INCINERATOR		0	0	0	0	0	--	--	--	--	0.00	--	--	--	--	--	--	--	0.00	--	--	--	--	--
DRILLING	Liquid Flaring		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WELL TEST	COMBUSTION FLARE - no smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - light smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - medium smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - heavy smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
ALASKA-SPECIFIC SOURCES	VESSLS		kw			HR/D	D/YR																		
	VESSLS - Ice Management Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	
2026 Facility Total Emissions								6.36	3.94	3.83	0.10	162.23	15.80	0.00	41.42	0.04	11.97	7.69	7.48	0.20	330.39	58.29	0.00	121.77	0.08
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES																2,550.62			2,550.62	2,550.62	2,550.62		61,321.58	
DRILLING	VESSLS- Crew Diesel		2265	116.52519	2796.60	12	87	1.60	0.96	0.94	0.02	38.28	1.10	0.00	6.00	0.01	0.83	0.50	0.49	0.01	19.98	0.57	0.00	3.13	0.01
	VESSLS - Supply Diesel		2265	116.52519	2796.60	12	85	1.60	0.96	0.94	0.02	38.28	1.10	0.00	6.00	0.01	0.62	0.38	0.36	0.01	14.93	0.43	0.00	2.34	0.00
	VESSLS - Tugs Diesel		4600	236.6516	5679.64	12	2	3.25	1.96	1.90	0.05	77.75	2.24	0.00	12.20	0.02	0.04	0.02	0.02	0.00	0.93	0.03	0.00	0.15	0.00
PIPELINE INSTALLATION	VESSLS - Support Diesel, Laying		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Support Diesel, Burying		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Crew Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Supply Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	VESSLS - Material Tug Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Crew Diesel		0																						

AIR EMISSIONS CALCULATIONS - 3RD YEAR

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL	CONTACT	PHONE	REMARKS																	
Arena Offshore_LP	Eugene Island	353	G37175	D (Complex ID #23027)		Aimee Dady	281-210-3180	Drill Well Locations DA and DB																	
OPERATIONS	EQUIPMENT	EQUIPMENT ID	RATING	MAX. FUEL	ACT. FUEL	RUN TIME	MAXIMUM POUNDS PER HOUR										ESTIMATED TONS								
	Diesel Engines		HP	GAL/HR	GAL/D		TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	
	Nat. Gas Engines		HP	SCF/HR	SCF/D																				
	Burners		MMBTU/HR	SCF/HR	SCF/D	HR/D	D/YR																		
DRILLING	VESSLS- Drilling - Propulsion Engine - Diesel		8800	452.7248	10865.40	24	180	6.21	3.75	3.63	0.09	148.74	4.28	0.00	23.33	0.04	13.41	8.09	7.85	0.20	321.29	9.24	0.00	50.39	0.09
WFD 400/450	VESSLS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSLS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSLS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Vessels - Diesel Boiler		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Vessels - Drilling Prime Engine, Auxiliary		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PIPELINE INSTALLATION	VESSLS - Pipeline Laying Vessel - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSLS - Pipeline Burying - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FACILITY INSTALLATION	VESSLS - Heavy Lift Vessel/Derrick Barge Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PRODUCTION	RECIP.<600hp Diesel (50 kw temp diesel rental generator)	DAN-001	67	3.446882	82.73	24	365	0.15	0.15	0.15	0.00	2.08	0.15	--	0.45	--	0.65	0.65	0.65	0.02	9.12	0.67	--	1.96	--
	RECIP.>600hp Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	VESSLS - Shuttle Tankers		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSLS - Well Stimulation		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Natural Gas Turbine		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	Diesel Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	
	Dual Fuel Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	RECIP. 2 Cycle Lean Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	RECIP. 4 Cycle Lean Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	RECIP. 4 Cycle Rich Natural Gas (250 kw generator #1)		335	2392.8571	57428.57	24	365	--	0.02	0.02	0.00	5.70	0.08	--	8.82	--	--	0.10	0.10	0.01	24.98	0.33	--	38.63	--
	RECIP. 4 Cycle Rich Natural Gas (250 kw generator #2)		335	2392.8571	57428.57	24	365	--	0.02	0.02	0.00	5.70	0.08	--	8.82	--	--	0.10	0.10	0.01	24.98	0.33	--	38.63	--
	Diesel Boiler		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Natural Gas Heater/Boiler/Burner		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	MISC.		BPD	SCF/HR	COUNT																				
	STORAGE TANK				0	0	0	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	
	COMBUSTION FLARE - no smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - light smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - medium smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - heavy smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COLD VENT (Vent Boom)				1	24	365	--	--	--	--	10.22	--	--	--	--	--	--	--	--	44.75	--	--	--	
	FUGITIVES				2013	24	365	--	--	--	--	1.01	--	--	--	--	--	--	--	--	4.41	--	--	--	
	GLYCOL DEHYDRATOR		0	0	--	0	0	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	
	WASTE INCINERATOR		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	--	0.00	--	--	--	0.00	0.00	0.00	0.00	--	0.00	--	
DRILLING WELL TEST	Liquid Flaring		0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	COMBUSTION FLARE - no smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - light smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - medium smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - heavy smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
ALASKA-SPECIFIC SOURCES	VESSLS		kW			HR/D	D/YR																		
	VESSLS - Ice Management Diesel		0			0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	2028 Facility Total Emissions							6.36	3.94	3.83	0.10	162.23	15.80	0.00	41.42	0.04	14.06	8.95	8.70	0.23	380.37	59.73	0.00	129.61	0.09
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES																								
	76.6																								
DRILLING	VESSLS- Crew Diesel		2265	116.52519	2796.60	12	104	1.60	0.96	0.94	0.02	38.28	1.10	0.00	6.00	0.01	1.00	0.60	0.58	0.01	23.89	0.69	0.00	3.75	0.01
	VESSLS - Supply Diesel		2265	116.52519	2796.60	12	78	1.60	0.96	0.94	0.02	38.28	1.10	0.00	6.00	0.01	0.75	0.45	0.44	0.01	17.92	0.52	0.00	2.81	0.01
	VESSLS - Tugs Diesel		4600	236.6516	5679.64	12	2	3.25	1.96	1.90	0.05	77.75	2.24	0.00	12.20	0.02	0.04	0.02	0.02	0.00	0.93	0.03	0.00	0.15	0.00
PIPELINE INSTALLATION	VESSLS - Support Diesel, Laying		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Support Diesel, Burying		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Crew Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Supply Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	VESSLS - Material Tug Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSLS - Crew Diesel		0	0																					

AIR EMISSIONS CALCULATIONS

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL				
Arena Offshore, LP	Eugene Island	353	G37175	D (Complex ID #23027)					
Year	Facility Emitted Substance								
	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3
2026	11.97	7.69	7.48	0.20	330.39	58.29	0.00	121.77	0.08
2027	14.06	8.95	8.70	0.23	380.37	59.73	0.00	129.61	0.09
2028	14.06	8.95	8.70	0.23	380.37	59.73	0.00	129.61	0.09
2029	14.06	8.95	8.70	0.23	380.37	59.73	0.00	129.61	0.09
2030	0.65	0.86	0.86	0.03	59.08	50.49	0.00	79.21	0.00
2031	0.65	0.86	0.86	0.03	59.08	50.49	0.00	79.21	0.00
2032	0.65	0.86	0.86	0.03	59.08	50.49	0.00	79.21	0.00
2033	0.65	0.86	0.86	0.03	59.08	50.49	0.00	79.21	0.00
2034	0.65	0.86	0.86	0.03	59.08	50.49	0.00	79.21	0.00
2035	0.65	0.86	0.86	0.03	59.08	50.49	0.00	79.21	0.00
Allowable	2550.62			2550.62	2550.62	2550.62		61321.58	

Oil Spill Response Discussion

**Attachment L
(Public Information)**

SPILL RESPONSE DISCUSSION

For the purpose of NEPA and Coastal Zone Management Act analysis, the largest spill volume originating from the proposed activity would be a well blowout during drilling operations, estimated to be 46,948 barrels of condensate with an API gravity of 40°.

Land Segment and Resource Identification

Trajectories of a spill and the probability of it impacting a land segment have been projected utilizing information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf available on the BOEM website. The results are shown in **Figure 1**. The BOEM OSRAM identifies an 11% probability of impact to the shorelines of Cameron Parish, Louisiana within 30 days. Cameron Parish includes the east side of Sabine Lake, Sabine National Wildlife Refuge, Calcasieu Lake, Lacassine National Wildlife Refuge (inland) and Grand Lake. Cameron Parish also includes the area along the coastline from Sabine Pass to Big Constance Lake in Rockefeller Wildlife Refuge. This region is composed of open public beaches, marshlands and swamps. It serves as a habitat for numerous birds, finfish and other animals, including several rare, threatened and endangered species.

Response

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

Using the estimated chemical and physical characteristics of crude oil, an ADIOS weathering model was run on a similar product from the ADIOS oil database.

Natural Weathering Data: EI 354, MODU DO13ST	Barrels of Oil
WCD Volume	46,948
Less 25% natural evaporation/dispersion	11,737
Remaining volume	35,211

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

Arena Offshore, LP's Oil Spill Response Plan includes alternative response technologies such as dispersants and in-situ burn. Strategies will be decided by Unified Command based on an operations safety analysis, the size of the spill, weather and potential impacts. If aerial dispersants are utilized, 4 sorties (4,800 gallons) from the DC-3 aircraft and 4 sorties (8,000 gallons) from the Basler aircraft would provide a daily dispersant capability of 7,540 barrels. If

the conditions are favorable for in-situ burning, the proper approvals have been obtained and the proper planning is in place, in-situ burning of oil may be attempted. Slick containment boom would be immediately called out and on-scene as soon as possible. Offshore response strategies may include attempting to skim utilizing CGA spill response equipment, with a total derated skimming capacity of 99,170 barrels. Temporary storage associated with skimming equipment equals 4,249 barrels. If additional storage is needed, various storage barges with a total capacity 130,000 bbls may be mobilized and centrally located to provide temporary storage and minimize off-loading time. Additionally, CGA works with the member company's Incident Management Team (IMT), specifically the marine logistics group within the logistics section, to identify and procure Offshore Supply Vessels (PSV/OSV) capable of providing temporary offshore storage to the initial mechanical recovery assets within 12-24 hours, ensuring that devices for the storage of recovered oil are sufficient to allow containment and recovery operations to continue without interruption. If needed, CGA can leverage an internal CGA membership vessel sharing agreement to help locate available Petroleum Industry Dedicated Vessels (PIDV). All OSVs can provide between 20% - 100% of their deadweight in recovered oil storage (4k – 30k bbls) based on the vessel's Certificate of Inspection (COI). **Safety is first priority. Air monitoring will be accomplished and operations deemed safe prior to any containment/skimming attempts.**

If the spill went unabated, shoreline impact in Terrebonne Parish, Louisiana would depend upon existing environmental conditions. Shoreline protection would include the use of CGA's near shore and shallow water skimmers with a totaled derated skimming capacity of 22,433 barrels. Temporary storage associated with skimming equipment equals 119 barrels. If additional storage is needed, one storage barge with a total capacity 35,000 bbls may be mobilized and centrally located to provide temporary storage and minimize off-loading time. Onshore response may include the deployment of shoreline boom on beach areas, or protection and sorbent boom on vegetated areas. A Master Service Agreement with AMPOL will ensure access to 81,450 feet of 18" shoreline protection boom. **Figure 2** outlines individual times needed for procurement, load out, travel time to the site and deployment. Strategies would be based upon surveillance and real time trajectories that depict areas of potential impact given actual sea and weather conditions. Applicable Area Contingency Plans (ACPs), Geographic Response Plans (GRPs), and Unified Command (UC) will be consulted to ensure that environmental and special economic resources are correctly identified and prioritized to ensure optimal protection. Shoreline protection strategies depict the protection response modes applicable for oil spill clean-up operations. The UC should take into consideration all appropriate items detailed in Tactics discussion of this Appendix. The UC and their personnel have the option to modify the deployment and operation of equipment to allow for a more effective response to site-specific circumstances. Arena Offshore, LP's contract Incident Management Team has access to the applicable ACP(s) and GRP(s).

Based on the anticipated worst case discharge scenario, Arena Offshore, LP can be onsite with contracted oil spill recovery equipment with adequate response capacity to contain and recover surface hydrocarbons, and prevent land impact, to the maximum extent practicable, within an estimated 50 hours (based on the equipment's Effective Daily Recovery Capacity (EDRC)).

Initial Response Considerations

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

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

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

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

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

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

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

Offshore Response Actions

Equipment Deployment

Surveillance

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

Dispersant application assets

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

Containment boom

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

Oceangoing Boom Barge

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

In-situ Burn assets

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

Dedicated off-shore skimming systems

General

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

CGA HOSS Barge

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

CGA 95' Fast Response Vessels (FRVs)

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

CGA FRUs

- To the area of the thickest oil
- Use as far off-shore as allowed

T&T Koseq Skimming Systems

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

Storage Vessels

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

Vessels of Opportunity (VOO)

- Use Arena Offshore, LP's contracted resources as applicable

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

Adverse Weather Operations:

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

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

Maximization of skimmer-oil encounter rate

- Place barges in skimming task forces, groups, etc., to reduce recovered oil offloading time
- Place barges alongside skimming systems for immediate offloading of recovered oil when practicable
- Use two vessels, each with heavy sea boom, in an open-ended "V" configuration to funnel surface oil into a trailing skimming unit's organic, V-shaped boom and skimmer (see page 7, *CGA Equipment Guide Book and Tactic Manual* (CGATM))
- Use secondary vessels and heavy sea boom to widen boom swath beyond normal skimming system limits (see page 15, CGATM)

- Consider night-time operations, first considering safety issues
- Utilize all available advanced technology systems (IR, X-Band Radar, etc.) to determine the location of, and move to, recoverable oil
- Confirm the presence of recoverable oil prior to moving to a new location

Maximize skimmer system efficiency

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

Recovered Oil Storage

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

Command, Control, and Communications (C³)

- Publish, implement, and fully test an appropriate communications plan
- Design an operational scheme, maintaining a manageable span of control
- Designate and mark C³ vessels for easy aerial identification
- Designate and employ C³ aircraft for task forces, groups, etc.
- Use reconnaissance air craft and Rapid Response Teams (RAT) to confirm the presence of recoverable oil

CGA Minimum Acceptable Capabilities for Vessels of Opportunity (VOO)

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

Capability	FRU	KOSEQ	AquaGuard
Type of Vessel	Utility Boat/ Offshore Supply Vessel	Offshore Supply Vessel	Utility Boat
Operating parameters			
Sea State	2-4 ft max	9.8 ft max	3-5 ft max
Skimming speed	≤1 kt	≤3 kts	≤1 kt
Vessel size			
Minimum Length	100-165 ft	200 ft	100 ft
Deck space for: <ul style="list-style-type: none"> • Tank(s) • Crane(s) • Boom Reels • Hydraulic Power Units • Equipment Boxes 	18x32 ft	100x40 ft	18x32 ft
Communication Assets	Marine Band Radio	Marine Band Radio	Marine Band Radio

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

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

The Fast Response Unit (FRU): The 502 FRU is designed to provide an advancing fast response skimming capability in the offshore and nearshore environment. To tow the FRU alongside the vessel, the rigid sweeping arm is connected to the ship by a tow line to a bow

bollard or forward bit. The range and sustainability offshore are determined by the PIDV the unit is placed on, but generally can stay offshore for extended periods. The FRU works well independently or assigned in a task force with other skimming assets and is more efficient when UAS or aircraft are assigned to direct into recoverable oil

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

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

Tactical Overview

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

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

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

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

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

2 to 4 portable storage tanks (500 bbl)

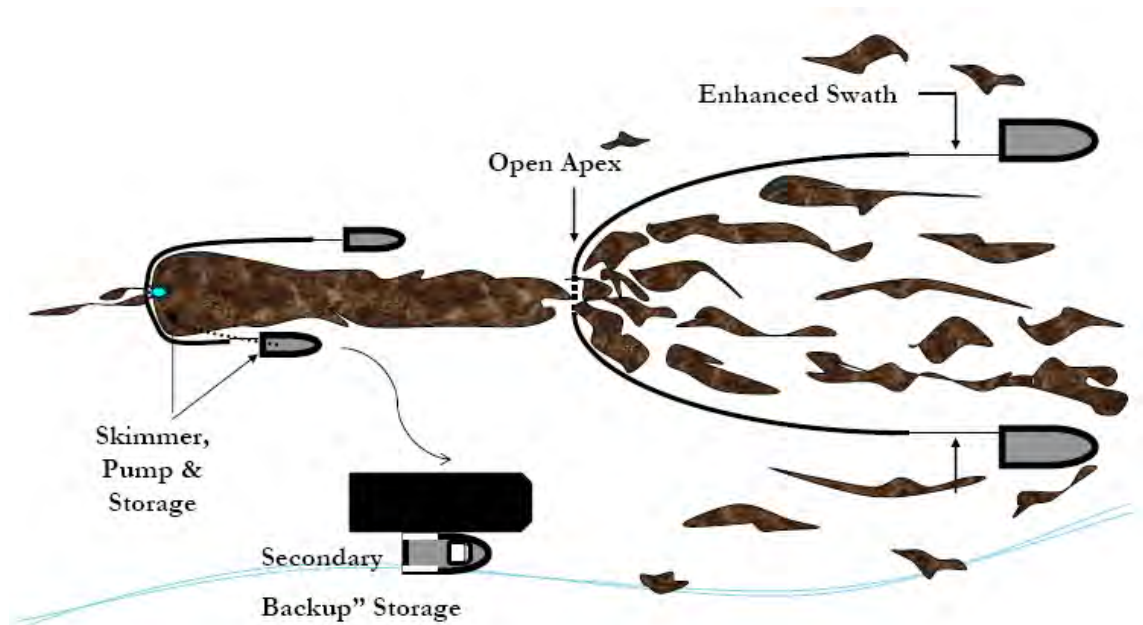
1 – Modular Crane Pedestal System set (MCPS) or 30 cherry picker (crane) for deployment

1 – Tank barge (offshore) for temporary storage

1 – Utility/Crewboat (supply)

1 – Designated spotter aircraft

4 – Personnel (4 T&T OSRO)



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





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

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

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

Near Shore Response Actions

Timing

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

Considerations

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

Surveillance

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

Dispersant Use

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

Dedicated Near Shore skimming systems

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

VOO

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

Shoreline Protection Operations

Response Planning Considerations

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

Placement of boom

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

Beach Preparation - Considerations and Actions

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

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

*Inland and Coastal Marsh Protection and Response
Considerations and Actions*

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

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

Decanting Strategy

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

CGA Equipment Limitations

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

Boom	3 foot seas, 20 knot winds
Dispersants	Winds more than 25 knots Visibility less than 3 nautical miles Ceiling less than 1,000 feet.
FRU	2-4 foot seas
HOSS Barge/OSRB	7 foot seas
Koseq Arms	8 foot seas
OSRV	3-5 foot seas

Environmental Conditions in the Gulf

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

Surface water temperature ranges between 70 and 80 ° F during the summer months. During the winter, the average temperature will range from 50 and 60 ° F.

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

**FIGURE 1
TRAJECTORY BY LAND SEGMENT**

<p>Trajectory of a spill and the probability of it impacting a land segment have been projected utilizing Arena Offshore, LP's WCD and information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf available on the BOEM website using 30 day impact. The results are tabulated below.</p>				
Area/Block	OCS-G	Launch Area	Land Segment and/or Resource	Conditional Probability (%) within 30 days
<p>EI 353, MODU Loc. DB</p> <p><i>77 miles from shore</i></p>	<p>G37175</p>	<p>C40</p>	Calhoun, TX	1
			Matagorda, TX	3
			Brazoria, TX	1
			Galveston, TX	5
			Jefferson, TX	5
			Cameron, LA	11
			Vermilion, LA	4
			Iberia, LA	2
			St. Mary, LA	1
			Terrebonne, LA	4
			Lafourche, LA	1
			Plaquemines, LA	2

WCD Scenario– BASED ON WELL BLOWOUT DURING DRILLING OPERATIONS (77 miles from shore)

35,211 bbls of crude oil (Volume considering natural weathering)

API Gravity 40°

FIGURE 2 – Equipment Response Time to EI 353, MODU Loc DB

Dispersants/Surveillance

Dispersant/Surveillance	Dispersant Capacity (gal)	Storage Capacity	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to site	Total Hrs
ASI								
Basler 67T	2000	NA	2	Houma	2	2	0.5	4.5
DC 3	1200	NA	2	Houma	2	2	0.7	4.7
Aero Commander	NA	NA	2	Houma	2	2	0.5	4.5

Offshore Response

Offshore Equipment No Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
CGA											
HOSS Barge	76285	4000	3 Tugs	8	Harvey	6	0	12	18	2	38
95' FRV	22885	249	NA	4	Leeville	2	0	2	5	1	10
Boom Barge (CGA-300) 42" Auto Boom (25000')	NA	NA	1 Tug 50 Crew	4 (Barge) 2 (Per Crew)	Leeville	8	0	4	15	2	29

Recovered Oil Storage No Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Spill Site	Hrs to Deploy	Total Hrs
Genesis Marine (available through contract with CGA)											
GM 6506	NA	65000	1 Tug	6	Houma	24	12	0	14	0	50
GM 6507	NA	65000	1 Tug	6	Houma	24	12	0	14	0	50

Staging Area: Fourchon

Offshore Equipment With Staging	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Load Out	Travel to Staging	Travel to Site	Hrs to Deploy	Total Hrs
CGA											
Hydro-Fire Boom	NA	NA	8 Utility	40	Harvey	0	24	3	9	6	42

Nearshore Response

Nearshore Recovered Oil Storage No Staging	EDRC	Storage Capacity	VOO	Persons Required	From	Hrs to Procure	Hrs to Loadout	Hrs to GOM	Travel to Site	Hrs to Deploy	Total Hrs
CGA											
46' FRV	15257	65	NA	4	Vermilion	2	0	2	2	0	6
Kirby Offshore (available through contract with CGA)											
Chesapeake	NA	35000	1 Tug	6	Houston	24	12	0	4	0	40

Staging Area: Cameron

Near shore and Inland Skimmers With Staging	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Load Out	Travel to Staging	Travel to Deployment	Hrs to Deploy	Total Hrs
CGA											
SWS Marco	3588	20	NA	3	Vermilion	2	2	2.5	2	1	9.5
SWS Marco	3588	34	NA	3	Leeville	2	2	7	2	1	14

Shoreline Protection

Staging Area: Cameron

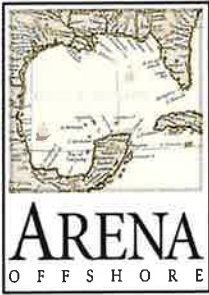
Shoreline Protection Boom	VOO	Persons Req.	Storage/Warehouse Location	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Deployment	Hrs to Deploy	Total Hrs
AMPOL (available through MSA)									
34,050' 18" Boom	13 Crew	26	New Iberia, LA	2	2	3.5	2	12	21.5
16,000' 18" Boom	7 Crew	14	Chalmette, LA	2	2	7.5	2	6	19.5
900' 18" Boom	1 Crew	2	Morgan City, LA	2	2	5	2	2	13
11,800' 18" Boom	5 Crew	10	Gonzales, LA	2	2	9	2	2	17
16,000' 18" Boom	7 Crew	14	Port Arthur, TX	2	2	1.5	2	6	13.5
2,700' 18" Boom	2 Crew	4	Decatur, GA	2	2	20	2	6	32

Wildlife Response	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Load Out	Travel to Staging	Travel to Deployment	Hrs to Deploy	Total Hrs
CGA											
Wildlife Support Trailer	NA	NA	NA	2	Harvey	2	2	7	1	2	14
Bird Scare Guns (24)	NA	NA	NA	2	Harvey	2	2	7	1	2	14
Bird Scare Guns (12)	NA	NA	NA	2	Galveston	2	2	4	1	2	11
Bird Scare Guns (12)	NA	NA	NA	2	Aransas Pass	2	2	9.9	1	2	16.9
Bird Scare Guns (24)	NA	NA	NA	2	Vermilion	2	2	1.5	1	2	8.5
Bird Scare Guns (24)	NA	NA	NA	2	Leeville	2	2	6.8	1	2	13.8

Response Asset	Total
Offshore EDRC	99,170
Offshore Recovered Oil Storage	134,249
Nearshore / Shallow Water EDRC	22,433
Nearshore / Shallow Water Recovered Oil Storage	35,119

NTL 2015-N01 – Worse Case Discharge

**Attachment M
(Public Information)**



ARENA OFFSHORE

Eugene Island Block 352 OCS-G 37174 “DB” Drilling Prospect WCD Supplemental Information

Discharge Scenario:

- Case 1.** Well Bridging Over – The GN-B Sand that will be encountered in the EI 352 “DB” is unconsolidated. Productive zones require gravel packs for sand control. The GN-B completion in the offset EI 352 A-1ST was gravel packed. It is anticipated that the severe drawdown resulting from a loss of well control will result in the hole bridging over in a matter of hours.
- Case 2.** Conventional Surface Intervention – It is assumed that a loss of well control from the surface will result in mobilizing 3rd party well control equipment to the rig. It is assumed that BOP’s are compromised, that the rig has not caught fire and is capable of supporting well control efforts with the assistance of a support vessel. As an example, the intervention would consist of top killing the well with kill weight mud or possibly replacing the BOP’s with another set to contain flow from the breached equipment.
- Case 3.** Relief Well Intervention – It is assumed that a rig is immediately available to mobilize to location to commence drilling a relief well. The mobilization and estimated time to drill the relief well is based on offset drilling performance curves.
- Case 4.** Relief Well Intervention – It is assumed that a rig is not immediately available to mobilize to location to commence drilling a relief well. The estimated time to mobilize a rig incorporates the suspension of activities by an Operator before the rig can be released for relief well operations. The time to drill the relief well is based on offset drilling performance curves.

Timeline for each worst case discharge scenario:

Case 1.	Well Bridging Over:	<1 day
Case 2.	Conventional Surface Intervention:	
	• Assess well condition:	2 days
	• Mobilize 3rd party equipment:	2 days
	• Contain discharge:	<u>10 days</u>
	• Total:	14 days
Case 3.	Relief Well Intervention (Rig Immediately Available):	
	• Assess well condition:	2 days
	• Mobilize rig:	3 days
	• Drill relief well:	<u>40 days</u>
	• Total:	45 days
Case 4.	Relief Well Intervention (Rig Not Immediately Available):	
	• Assess well condition:	2 days
	• Suspend current operations:	10 days
	• Mobilize rig:	3 days
	• Drill relief well:	<u>40 days</u>
	• Total:	55 days

Relief Well Rig Availability:

- It is planned to drill the EI 352 “DB” using a jackup rig from the EI 353 “D” Platform which was installed during 1984 in 298’ of water. There are 3 jackup rigs currently marketed in the Gulf of Mexico that are capable of drilling an open water relief well to this EI 353 “D” Platform location. These are described in Table 1.

TABLE 1:



**Westwood
Global Energy
Group**

**US GULF RIG UTILIZATION AND DAY RATES
April 4, 2025**

<u>RIG TYPE</u>	<u>TOTAL SUPPLY</u>	<u>MARKETED SUPPLY</u>	<u>RIGS CONTRACTED/ COMMITTED</u>	<u>CONTRACTED UTILIZATION (TOTAL FLEET)</u>	<u>CONTRACTED UTILIZATION (MKTD FLEET)</u>	<u>RIGS WORKING</u>	<u>WORKING UTILIZATION (TOTAL FLEET)</u>	<u>WORKING UTILIZATION (MKTD FLEET)</u>
Jackup - 375-400'HC	3	2	2	66.7%	100.0%	1	33.3%	50.0%



ARENA OFFSHORE

Eugene Island Block 352 OCS-G 37174 “DB” Drilling Prospect WCD Supplemental Information

Blowout Prevention Measures:

The purpose of this document is to describe measures that Arena Offshore will take to enhance its ability to prevent a blowout, to reduce the likelihood of a blowout, and to conduct effective and early intervention in the event of a blowout from the EI 352 “DB” Drilling Prospect.

Blowout Prevention:

The following measures will be taken in an attempt to ensure that the EI 352 “DB” Well is kept under control at all times:

- An Arena Offshore onsite representative will witness and review all BOP tests, casing tests and formation integrity tests.
- An Arena Offshore Superintendent in the office will review all FIT tests prior to moving forward with drilling operations.
- Prior to commencing cementing operations on any casing string, a minimum of 1½ bottoms up will be circulated with drilling mud, so long as full returns are maintained, in order to enhance the ability of achieving a successful cement job.
- A liner top packer, in addition to cement, will be utilized in order to ensure the pressure integrity of the liner lap of any liner run in the well.
- All production casing strings will be centralized across hydrocarbon bearing zones in order to ensure the proper isolation of individual pay sands by cementation and to prevent the transmission of hydrocarbons up the annulus behind the production casing.
- The proposed well will be drilled on a mud weight schedule utilizing extensive offset data from offset wells in the field. Proposed drilling mud weights will allow for at a minimum, the known hydrostatic pressures required to drill the known hydrocarbon zones encountered in the original development of the field.
- Lost circulation material in the form of properly distributed particle sized mud additives (PSDs) will be added to the mud system in the form of sweeps while drilling both the intermediate and production hole sections. PSD additives will be utilized to prevent uncontrolled mud losses in the case that lower than anticipated pore pressures or fracture gradients are encountered.
- Wiper trips will be performed as hole conditions dictate in order to quantify the stability of the wellbore and determine if sufficient mud weights are being utilized to prevent influx of formation fluids, prevent swabbing of wellbore fluids while pulling pipe and prevent losses of wellbore fluids to the formation.
- Connections will be simulated while drilling into pressure transition areas in order to properly assess the current wellbore conditions.

-
- Mudloggers may be utilized during the drilling of the well in order to specifically evaluate wellbore conditions including but not limited to weights of returning drilling fluids as compared to that of the fluid entering the hole, gas content of mud returns, formation characteristics and abnormalities of cuttings and estimated paleo aging of cuttings.
 - Logging while drilling tools (LWD) will be utilized to evaluate and estimate lithology, formation pressures and fluid content from surface casing point to wellbore total depth. This will enable the real time identification of any changes in anticipated formation pressures and assist in the picking of intermediate casing points and wellbore total depth, potentially eliminating the possibility of drilling into unexpected formations that could cause dangerous well control situations. Log data will be regularly provided to the office for evaluation.
 - Pressure While Drilling (PWD) data will be utilized to ensure the stability of, and to maintain constant monitoring of hydrostatic pressures applied to, the wellbore.

Blowout Intervention:

In the event of an uncontrolled flow of hydrocarbons from the EI 352 “DB” wellbore, the Oil Spill Response Plan (OSRP) as described in the DOCD will be activated. In addition to the activation of this plan two scenarios of well intervention have been described in the attached documentation and current availability of equipment to enact both well intervention scenarios identified:

- Assuming in an uncontrolled flow situation, the MODU is intact and not sufficiently damaged, along with the “DB” wellbore and surface equipment, wellbore intervention would be performed from the MODU itself, or a barge mobilized nearby. Master Service Agreements (MSAs) have been established with Cudd Pressure Control and Wild Well Control in order to expedite response in the case of an uncontrolled flow situation. As an example, flow could be controlled from either a “top kill” method or from the removal of the surface BOP stack and subsequent replacement of the stack and the wellbore shut in.
- In the event that the MODU and/or the LOC N wellbore is irreparably damaged during a blowout scenario, wellbore intervention would be performed by contracting an additional MODU, mobilizing it to location and the subsequent spudding and drilling of a relief well. Arena Offshore currently has in place established contracts with all contractors that operate jack-up rigs in the Gulf of Mexico. Such contracts would be utilized to expedite the contracting of a rig in order to drill a relief well.

In the case of an uncontrolled flow of hydrocarbons, Arena Offshore will simultaneously pursue multiple wellbore intervention methods in an attempt to mitigate and terminate the spill, until the wellbore is brought under control.






Vicinity Map

**Attachment N
(Public Information)**

EI 353, Platform D

Vicinity Map

Legend

-  Distance to heliport = 129 miles
-  Distance to shore = 77 miles
-  Distance to shorebase = 111 miles
-  EI 353, Platform D
-  Rice's Whale Core Distribution Area

Google Earth

Data SIO, NOAA, U.S. Navy, NGA, GEBCO

Image Landsat / Copernicus

Data LDEO-Columbia, NSF, NOAA

Image NOAA



80 mi

CZM Certification

**Attachment O
(Public Information)**

COASTAL ZONE MANAGEMENT CONSISTENCY CERTIFICATION

**INITIAL DEVELOPMENT OPERATIONS COORDINATION
DOCUMENT**

Eugene Island Blocks 353 (existing surface location)

Eugene Island Blocks 352

Leases OCS-G 37175/37174

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: **Arena Offshore, LP**

Signed By: *Aimee Deady*

Dated: February 26, 2026