

DATE 5-1-90

TO: OPS-3-4

FROM: FO-2-1

Unit Development Operations Coordination Document (DOCD) and Environmental Information  
Leases OCS-G 6957, 6958 and 6962, Control No. U-0666

**NOTED — KRAMER**

**Office of  
Program Services**

**MAY 2 1990**

**Information Services  
Section**



### HYDROGEN SULFIDE

AEDC recommends the area be classified as a zone where the absence of hydrogen sulfide has been confirmed. This request for classification is based on the drilling of OCS-G 6957, Well No. 1; where the presence of hydrogen sulfide was not encountered during the course of operations.

Therefore, in accordance with Title 30 CFR 250.67, AEDC (USA) Inc. hereby requests that a determination be made by MMS that the zones are in an area where the absence of hydrogen sulfide has been confirmed.

### BATHYMETRY MAP

A bathymetry map showing the surface location of the proposed structure is included as Attachment E.

### SHALLOW HAZARDS

A site specific shallow hazards survey was conducted by Ocean Marine Geophysics Inc. on behalf of Arco Exploration Company and was submitted as part of the Initial Plan of Exploration for Mississippi Canyon Block 486 (OCS-G 6957). In addition to the hazard data obtained by Ocean Marine Geophysics, AEDC has reviewed more recent hazard data over the area completed by John E. Chance & Associates (proposed pipeline route). Both surveys reveal that there are no shallow hazards below the proposed platform location. AEDC has determined from reviewing these data, that this surface location is suitable for platform installation.

### OIL SPILL CONTINGENCY PLAN & RESPONSE TIME

All construction and production operations shall be performed in accordance with industry standards to prevent pollution of the environment. AEDC (USA) Inc.'s Oil Spill Contingency Plan has been approved by the MMS. This plan designates an Emergency Response Team consisting of AEDC personnel and contract personnel. This team's duties are to eliminate the source of any spill, remove all sources of possible ignition, deploy the most reliable means of available transportation to monitor the movement of a slick, and contain and remove the slick if possible.

AEDC is a member of Clean Gulf Associates (CGA). The CGA stores pollution control equipment at two locations in Texas, at Rockport and Galveston; and five locations in Louisiana, at Venice, Grand Isle, Intracoastal City, Houma and Cameron.

Each location is equipped with fast response skimmers and there is a barge mounted high volume open sea skimmer based at Grand Isle, Louisiana. In addition to providing equipment, the CGA also supplies advisers for clean-up operations. Equipment available from CGA and the base it is located at is listed in the CGA Manual, Volume I, Section III.

AEDC (USA) INC.

INITIAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

MISSISSIPPI CANYON 487 UNIT

UNIT AGREEMENT NO. 754389006

QUANTITIES AND RATES OF DISCHARGES

<u>WELL</u>	<u>HOLE SIZE</u>	<u>DEPTH</u>	<u>DISCHARGE VOLUME (BBL/S)</u>	<u>MAX. DISCHARGE RATE</u>
AA	26"	1800'	1420	MAX. 1060 BPH
	22"	3900'	1185	MAX. 1000 BPH
	14-3/4"	5500'	410	MAX. 1000 BPH
	7-5/8"	11104'	380	MAX. 1000 BPH
BB	26"	1800'	1420	MAX. 1000 BPH
	22"	3900'	1185	MAX. 1000 BPH
	14-3/4"	5500'	410	MAX. 1000 BPH
	7-5/8"	14287'	600	MAX. 1000 BPH
CC	26"	1800'	1420	MAX. 1000 BPH
	22"	3900'	1185	MAX. 1000 BPH
	14-3/4"	5500'	410	MAX. 1000 BPH
	7-5/8"	12409'	470	MAX. 1000 BPH
DD	26"	1800'	1420	MAX. 1000 BPH
	22"	3900'	1185	MAX. 1000 BPH
	14-3/4"	5500'	410	MAX. 1000 BPH
	7-5/8"	13173'	520	MAX. 1000 BPH

# AEDC (USA) INC.

TELEPHONE:  
(713) 680-8242

1212 MAIN, SUITE 943  
HOUSTON, TEXAS 77002

FAX:  
(713) 684-7712

April 10, 1990



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

RE: Initial Development Operations Coordination Document  
Mississippi Canyon 487 Federal Unit Agreement No. 754389006  
OCS Federal Waters, Gulf of Mexico, Offshore, Louisiana

Gentlemen:

In accordance with the provisions of Title 30 CFR 250.34, AEDC (USA) Inc. (AEDC) hereby submits for your review and approval nine (9) copies of an Initial Development Operations Coordination Document for Mississippi Canyon 487 Federal Unit, (Unit Agreement No. 754389006), Offshore, Louisiana. Five (5) copies are "Proprietary Information" and four (4) copies are "Public Information".

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

AEDC anticipates commencing activities under this proposed Initial Development Operations Coordination Document approximately September, 1990.

Should you have any questions or requests for additional information, please contact our regulatory agent, Connie J. Goers, J. Connor Consulting at (713) 558-0607.

Sincerely,

AEDC (USA) Inc.

*Hisayasu Tokunaga / c/jg*

Hisayasu Tokunaga  
Executive Vice President

HT:CJG  
Enclosures

**"Public Information"**

**AEDC (USA) INC.**

**INITIAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT**

**MISSISSIPPI CANYON 487 FEDERAL UNIT**

**UNIT AGREEMENT NO. 754389006**

AEDC (USA) Inc. (AEDC), as designated operator of the subject federal unit, hereby submits this proposed Initial Development Operations Coordination Document in accordance with the regulations contained in Title 30 CFR 250.34 and more specifically defined in the Minerals Management Service Letters to Lessees and Operators dated October 12, 1988 and September 5, 1989.

**BRIEF HISTORY TO DATE**

By letter dated March 16, 1989, MMS approved the unitization of leases OCS-G 6949, 6957, 6958, 6962 and 8825, Mississippi Canyon Blocks 443, 486, 487, 530 and 531 N/2, respectively. Additionally, a suspension of production for the unit was approved through October 31, 1990, by which time development drilling is scheduled to commence.

**SCHEDULE OF OPERATIONS**

AEDC proposes to install a 12-slot drilling and production platform in Mississippi Canyon Block 486 (OCS-G 6957). A total of four wells will be drilled and produced from this structure, to be designated as Production Platform "A". A 12.750" right-of-way pipeline will be installed to transport produced hydrocarbons, originating at proposed Production Platform "A" in Mississippi Canyon Block 486 and terminating via subsea tie-in with an existing pipeline located in Grand Isle Block 94.

No new nearshore or onshore pipelines or facilities will be constructed. The specific system will be determined during the negotiation of a gas marketing contract which will take place prior to construction and installation of the pipeline.

A well location table showing surface and bottom hole locations, total well depths and water depths of the subject wells is included as Attachment A.

Activities under this Initial Development Operations Coordination Document for Mississippi Canyon 487 Unit will commence in September, 1990 with the installation of the proposed platform. The following schedule details the chronological order of the proposed events leading to full start up of production.

<u>Activity</u>	<u>Activity Schedule Estimated Start-Up</u>
1. Commence Platform Installation	September, 1990
2. Commence Drilling Four Wells	October, 1990
3. Commence Pipeline Installation	October, 1990
4. Commence Production	August, 1991

#### DESCRIPTION OF DRILLING UNIT

The subject wells will be drilled and completed utilizing a typical self-contained platform drilling rig. Typical Diverter and BOP Schematics are included as Attachments B-1 and B-2.

Safety features include well control and blowout prevention equipment as described in Subpart D of 30 CFR Part 250. The appropriate life rafts, life jackets, ring buoys, etc., as prescribed by the U. S. Coast Guard will be maintained on the facility at all times.

#### DESCRIPTION OF PLATFORM

AEDC proposes to install a 12-slot drilling and production manned platform at a surface location of 9740' FSL and 4620' FEL of Mississippi Canyon Block 486 (OCS-G 6957). A schematic of the proposed structure is included as Attachment C.

Any hydrocarbon handling equipment installed for testing and production operations, such as separators, tanks, and treaters shall be designed, installed and operated to prevent pollution from the proposed platform.

Maintenance or repairs which are necessary to prevent pollution of offshore waters shall be undertaken immediately.

There shall be no disposal of equipment, cables, containers, or other materials into offshore waters.

#### STRUCTURE MAP

A current structure map drawn to the top of each prospective hydrocarbon accumulation showing the surface and bottom hole location of the subject wells is included as Attachment D.

The estimated life of reserves for the Mississippi Canyon 487 Unit Area is BCPD. with expected initial production at MNCFD and

### HYDROGEN SULFIDE

AEDC recommends the area be classified as a zone where the absence of hydrogen sulfide has been confirmed. This request for classification is based on the drilling of OCS-G 6957, Well No. 1; where the presence of hydrogen sulfide was not encountered during the course of operations.

Therefore, in accordance with Title 30 CFR 250.67, AEDC (USA) Inc. hereby requests that a determination be made by MMS that the zones are in an area where the absence of hydrogen sulfide has been confirmed.

### BATHYMETRY MAP

A bathymetry map showing the surface location of the proposed structure is included as Attachment E.

### SHALLOW HAZARDS

A site specific shallow hazards analysis was completed and submitted as part of the Initial Plan of Exploration for Mississippi Canyon Block 486 (OCS-G 6957). The well previously drilled at this location verify no shallow gas hazards exist. Soil borings have been taken at the development location to properly design and size the production platform.

### OIL SPILL CONTINGENCY PLAN & RESPONSE TIME

All construction and production operations shall be performed in accordance with industry standards to prevent pollution of the environment. AEDC (USA) Inc.'s Oil Spill Contingency Plan has been approved by the MMS. This plan designates an Emergency Response Team consisting of AEDC personnel and contract personnel. This team's duties are to eliminate the source of any spill, remove all sources of possible ignition, deploy the most reliable means of available transportation to monitor the movement of a slick, and contain and remove the slick if possible.

AEDC is a member of Clean Gulf Associates (CGA). The CGA stores pollution control equipment at two locations in Texas, at Rockport and Galveston; and five locations in Louisiana, at Venice, Grand Isle, Intracoastal City, Houma and Cameron.

Each location is equipped with fast response skimmers and there is a barge mounted high volume open sea skimmer based at Grand Isle, Louisiana. In addition to providing equipment, the CGA also supplies advisors for clean-up operations. Equipment available from CGA and the base it is located at is listed in the CGA Manual, Volume I, Section III.

Estimated response time for a spill in the Mississippi Canyon 487 Unit Area (Mississippi Canyon Block 486) could vary from 7 to 12 hours minimum based on:

	<u>HOURS</u>
1. Procurement and travel time for marine vessel to transport pollution control equipment	1.5 Hours
2. Load out Fast Response Unit and oil spill containment equipment	2.0 Hours
3. Travel time to lease site	<u>7.0 Hours</u>
Estimated Total Time	10.5 Hours

Equipment located in Venice, Louisiana would be utilized first with additional equipment transported from the nearest equipment base as required.

In the event a spill occurs from the surface location in Mississippi Canyon Block 486, a projected trajectory of a spill has been done utilizing information in the Environmental Impact Statement (EIS) for OCS Lease Sales 123 and 125.

The EIS contains oil spill trajectory simulations using seasonal surface currents coupled with wind data, adjusted every 3 hours for 30 days or until a target is contacted. Hypothetical spill trajectories were simulated for each of the potential launch sites across the entire Gulf. These simulations presume 500 spills occurring each of the four seasons of the year. The results in the EIS were presented as probabilities that an oil spill beginning from a particular launch site would contact a certain land segment within 3, 10, or 30 days. Utilizing the summary of the trajectory analysis (for 10 days) as presented on the summary on pages IV-36 through IV-39, the probable projected land fall of an oil spill is as follows. Also listed is the CGA Map Number corresponding to the land segment which will be utilized to determine environmentally sensitive areas that may be affected by a spill.

<u>AREA</u>	<u>LAND SEGMENT</u>	<u>%</u>	<u>CGA MAP NO.</u>
Mississippi Canyon 486	Lafourche Parish, LA	3%	LA Map No. 6
	Jefferson Parish, LA	4%	LA Maps No. 6 & 7
	Plaquemines Parish, LA	41%	LA Maps No. 6 & 7

If a spill should occur from the proposed location, AEDC would immediately activate its Emergency Response Team, determine from current conditions the probable location and time of land fall by contacting the National Oceanic and Atmospheric Administration's (NOAA) Gulf of Mexico Scientific Support Coordinator (SSC), for assistance in predicting spill movement. Then, using the Clean Gulf Operations Manual, Volume II, Section V, identify the biologically sensitive area and determine the

appropriate response mode. Section V, Volume II of the CGA Manual containing maps as listed above, also includes equipment containment/clean-up protection response modes for the sensitive areas.

Section VI, Volume II of the CGA Operations Manual depicts the protection response modes that are applicable for oil spill clean-up operations. Each response mode is schematically represented to show optimum deployment and operation of the equipment in areas of environmental concern.

Implementation of the suggested procedures assures the most effective use of the equipment and will result in reduced adverse impact of oil spills on the environment. Supervisory personnel have the option to modify the deployment and operation of equipment to more effectively respond to site-specific circumstances.

#### NEW OR UNUSUAL TECHNOLOGY

No new or unusual technology will be utilized during the proposed operations.

#### LEASE STIPULATIONS

Stipulation No. 1 attached to and made a part of each oil and gas lease involved in the subject unit area provided for the preparation of a Cultural Resource Study to determine the potential existence of any cultural resources that may be affected by operations. This stipulation was waived on all lease blocks within the unit area.

Stipulation No. 5 attached to and made a part of the subject leases provide for the Regional Director to suspend or temporarily prohibit production or any other operation or activity if such suspension or cessation is necessary to complete operations described in an approved Development Operations Coordination Document. The subject unit is currently maintained by an approved suspension of production through October, 1990.

Currently, operators in water depths greater than 400 meters are required to provide certain data in order for MMS to make determinations regarding the possibility of chemosynthetic communities being present and the potential of their being harmed by exploration and development activities.

#### DISCHARGES

All discharges associated with the drilling and production of the subject wells will be in accordance with the permit limitations addressed in the Environmental Protection Agency NPDES General Permit for the Gulf of Mexico.

Discharges will contain no free oil and will be in compliance with and monitored in accordance with the subject permit. Any drilling fluid contaminated with oil will be transported to shore for proper disposal at an authorized disposal site. A listing of typical mud components which may be utilized during the proposed drilling operations is included as Attachment F.

Quantities and rates of discharges associated with the proposed drilling operations is included as Attachment G.

Solid domestic wastes will be transported to shore for proper disposal at an authorized disposal site.

Sewage will be treated on location.

Mud may be discharged for purposes of dilution or at end of well.

#### ENVIRONMENTAL REPORT

An Environmental Report is included as Attachment H.

#### COASTAL ZONE CONSISTENCY CERTIFICATION

A Certificate of Coastal Zone Management Consistency for the State of Louisiana is enclosed as Attachment I. Copies of the public notice requests for publication in the Baton Rouge State Times and appropriate Parish Journal are enclosed as Attachments J and K.

#### PROJECTED EMISSIONS

Projected Air Emissions are included as Attachment L.

#### ONSHORE SUPPORT BASE

The Mississippi Canyon 497 Unit Area is located approximately 46 miles from the nearest shoreline south of the Louisiana coastline in a water depth of approximately 560 feet in the central area of Block 486 to 1760 feet in the northeast corner of Block 487, all being located within the Mississippi Canyon Area. A vicinity map showing the proposed surface location of Production Platform "A" in Block 486 relative to the shoreline is included as Attachment M.

AEDC will utilize existing onshore support facilities located in Fourchon, Louisiana. The following details the type and number of trips for support vessels during the proposed operations.

Drilling Operations

Production Operations

Crew Boat	7 Trips Per Week	1 Trip Per Week
Supply Boat	4 Trips Per Week	2 Trips Per Week
Helicopter	7 Trips Per Week	2 Trips Per Week

The proposed activities associated with Mississippi Canyon 407 Unit should not result in any increase in the size and number of onshore support and storage facilities or land and personnel requirements.

AUTHORIZED COMPANY CONTACT

The authorized company contact for questions concerning the proposed activities is:

Ms. Connie J. Goers  
Mc Connor Consulting  
P. O. Box 218753  
Houston, Texas 77211  
(713) 558-0607

LIST OF ATTACHMENTS

- A Well Location Table
- B Converter and ESP Schematics
- C Platform Elevation Drawing
- D Structure Map
- E Bathymetry Map
- F Typical Mud Components
- G Quantities and Rates of Discharges
- H Environmental Report
- I Coastal Zone Consistency Certification
- J Public Notice Request - State Times
- K Public Notice Request - Parish Newspaper
- L Projected Air Emissions
- M Vicinity Map

AEDC (USA) Inc.

INITIAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

MISSISSIPPI CANYON 487 UNIT

UNIT AGREEMENT NO. 754389006

WELL LOCATION TABLE

<u>WELL</u>	<u>LOCATION</u>	<u>TOTAL DEPTH</u>	<u>WATER DEPTH</u>
2A	PSL: 9740' FSL & 4620' FEL of 486 PBHL:		582'
BB	PSL: 9740' FSL & 4620' FEL of 486 PBHL:		582'
CC	PSL: 9740' FSL & 4620' FEL of 486 PBHL:		582'
DD	PSL: 9740' FSL & 4620' FEL of 486 PBHL:		582'

486

AEDCIUSA1  
OCS-G-8957

477

AEDCIUSA1  
OCS-G-8958

P/F 4820 FSL  
9740 FSL



Amoco 1/3

◆ Chevron 4

◆ Chevron 1

◆ Chevron 5

◆ Arco 1/1 Stk.

◆ Arco 1/1 Stk.

◆ Chevron 2/3

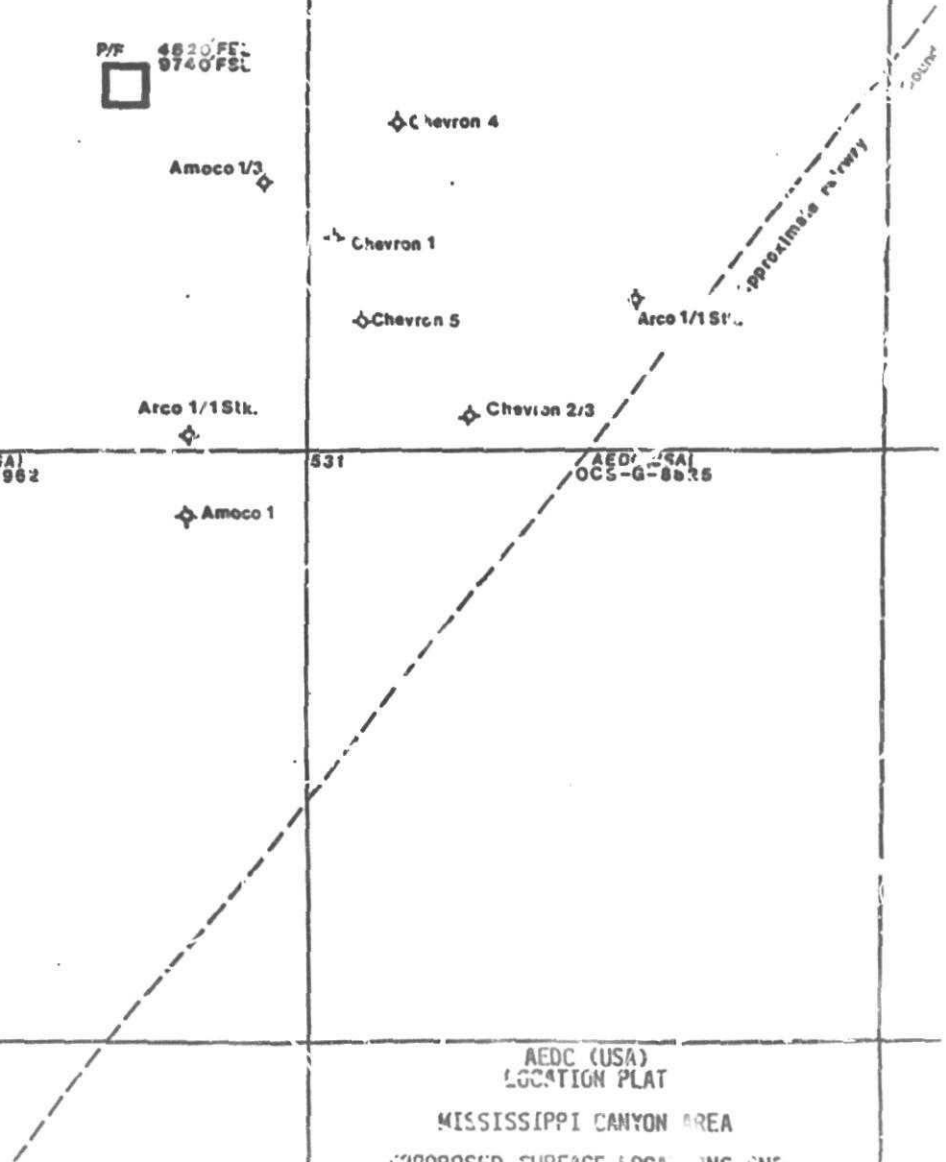
530

AEDCIUSA1  
OCS-G-8962

531

AEDCIUSA1  
OCS-G-8965

◆ Amoco 1



AEDC (USA)  
LOCATION PLAT

MISSISSIPPI CANYON AREA

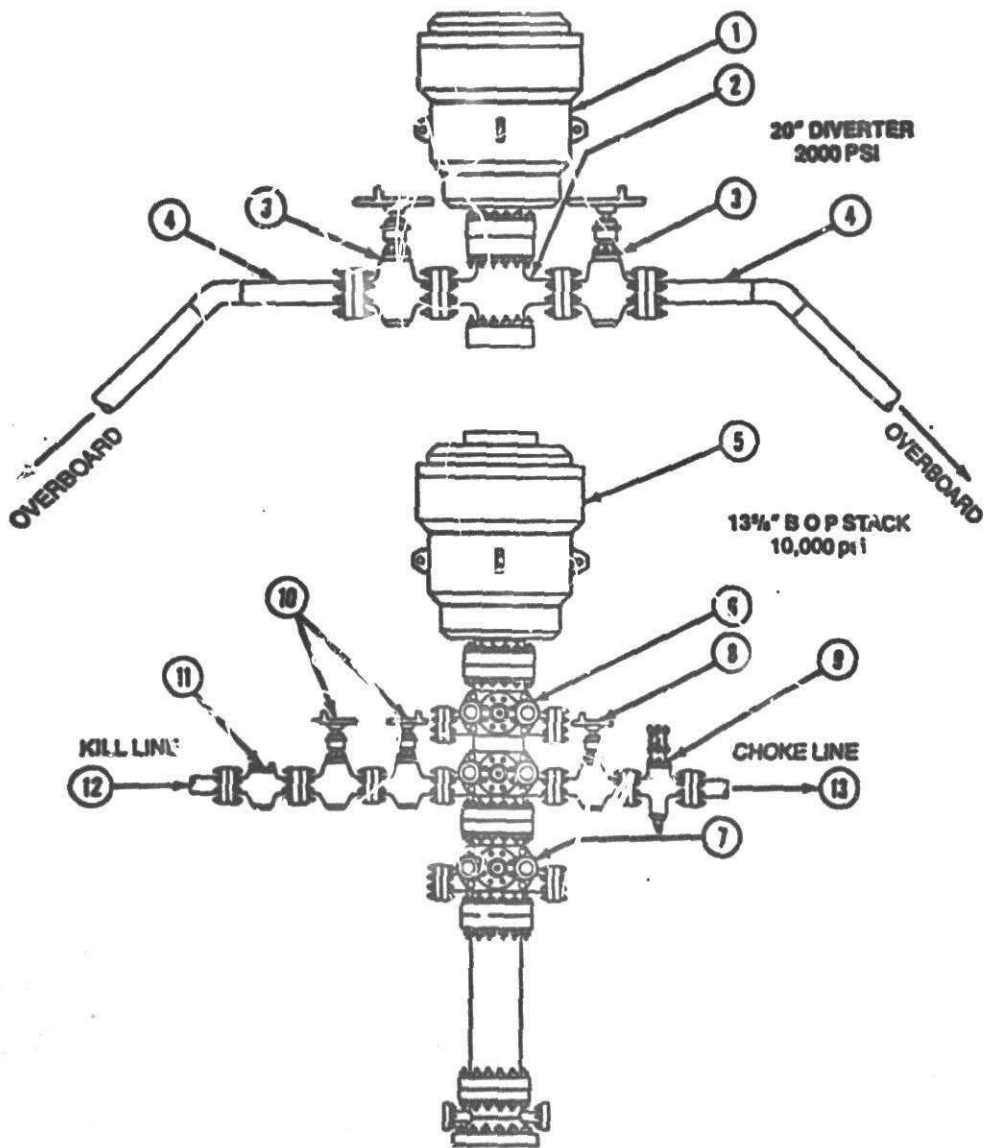
(PROPOSED SURFACE LOCATIONS AND  
EXISTING WELL SURFACE LOCATIONS)

ATTACHMENT A-2

Scale 1" = 4000 Ft.  
0 1 1 1 5000

2/19/90

# BLOWOUT PREVENTER STACK WITH A HYDRIL DIVERTER



Refer to following page for description of individual items of this assembly.

ATTACHMENT B-1



## 20" HYDRIL DIVERTER 2000 psi

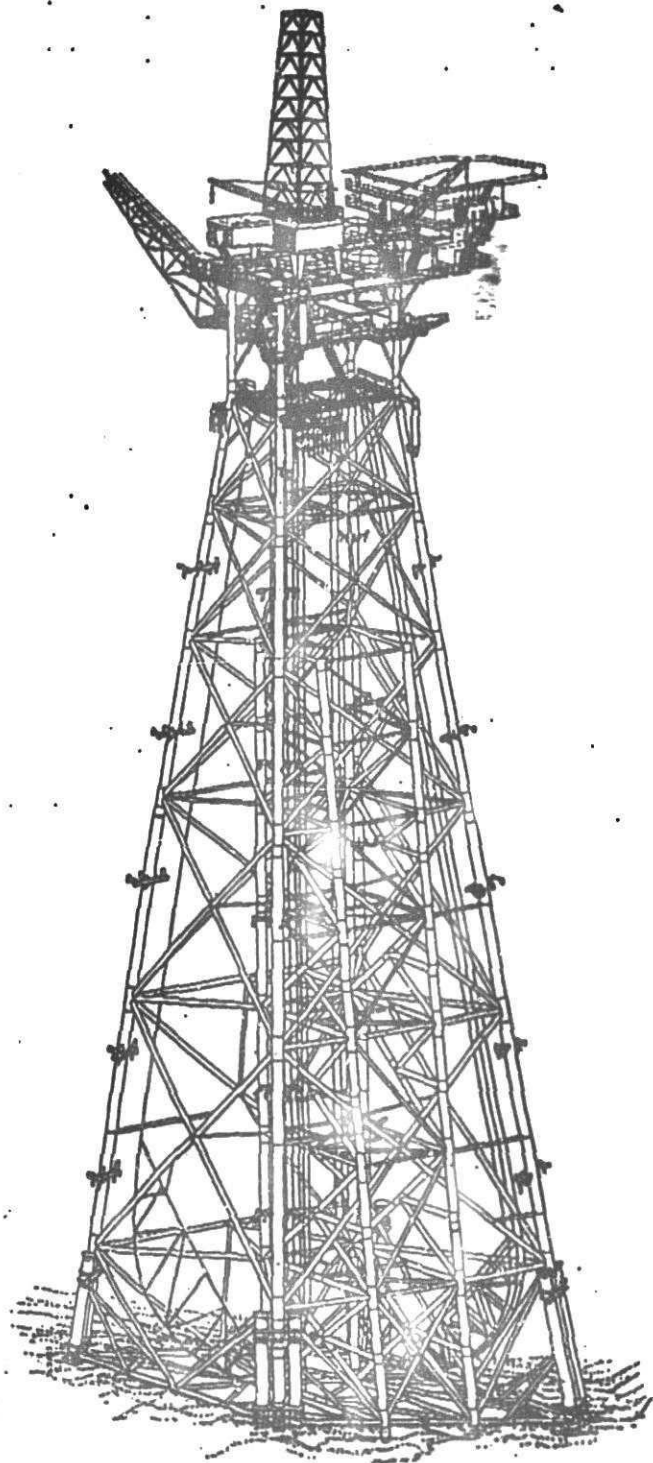
ITEM	DESCRIPTION
1	20" HYDRIL 2000 psi Type MSP
2	20" FLANGE SPOOL 2000 psi w/6" 2000 psi Outlets
3	6" GATE VALVE std Low Pressure (REMOTE)
4	6" DIVERTER LINE (To Overboard)

## BLOWOUT PREVENTER STACK

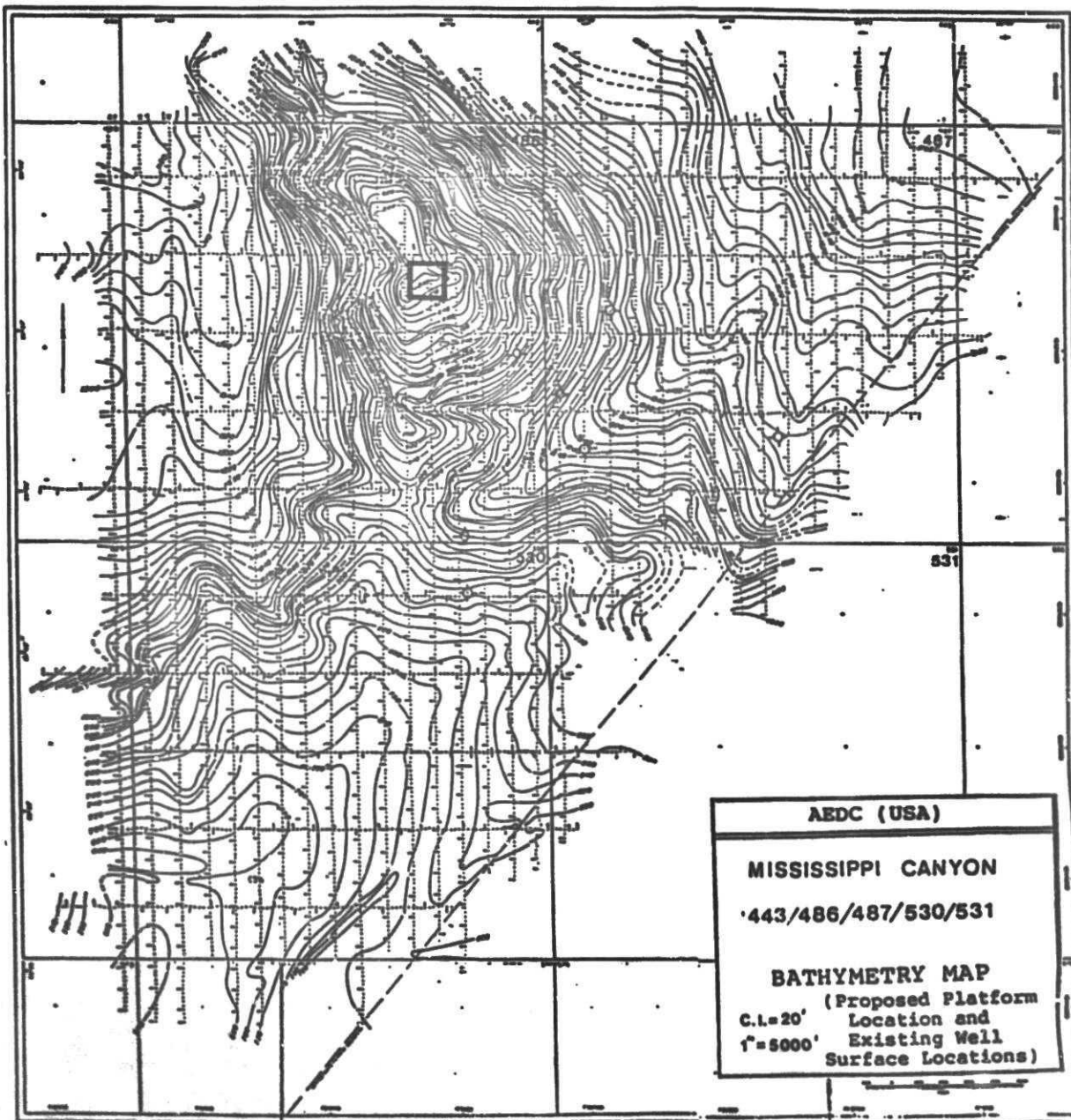
13<sup>5</sup>/<sub>8</sub>' 10,000 psi

ITEM	DESCRIPTION
5	13 <sup>5</sup> / <sub>8</sub> " HYDRIL ANNULAR BOP 5000 psi Type GK H2S Trimmed
6	13 <sup>5</sup> / <sub>8</sub> " CAMERON DOUBLE BOP 10,000 psi WP H,2S Trimmed
7	13 <sup>5</sup> / <sub>8</sub> " CAMERON SINGLE BOP 10,000 psi WP H,2S Trimmed
8	4 <sup>1</sup> / <sub>2</sub> " MANUAL GATE VALVE Cameron Type "F" H,2S
9	2 <sup>1</sup> / <sub>2</sub> " REMOTE HYDRAULIC VALVE Cameron Type "F" 10,000 psi H,2S
10	2 <sup>1</sup> / <sub>2</sub> " MANUAL GATE VALVE Cameron Type "F" 10,000 psi H,2S
11	2 <sup>1</sup> / <sub>2</sub> " CHECK VALVE Cameron Type "R" 10,000 psi H,2S
12	3" 10,000 psi KILL LINE from Choke Manifold
13	3" 10,000 psi CHOKE LINE from choke Manifold





ATTACHMENT C



## DRILLING MUD COMPONENTS

### COMMON CHEMICAL OR CHEMICAL TRADE NAME

Aluminum Stearate  
"AXTAFLO-S"  
Barite  
Calcium Carbonate  
Calcium Chloride  
Calcium Oxide  
Calcium Sulfate  
Carboxymethyl Cellulose  
Caustic Potash  
Caustic Soda  
Chrome Lignite  
Chrome Lignosulfonate  
Drilling Detergent  
"E-Pal"  
Ferrocrome Lignosulfonate  
Gel  
  
Gypsum  
Lignite  
Lignosulfonate  
"Mud Sweep"  
"MGR-REX"  
"Shale-Trol"  
Sapp  
Soda Ash  
Sodium Bicarbonate  
Sodium Carboxymethyl Cellulose  
Sodium Chloride  
Sodium Chromate  
Starch  
"TX-9010"  
"TORQ-Trim"  
"Black Magic"  
"Black Magic Supermix"  
Diesel  
  
"Jelflake"  
MICA  
"Pipe-Lax"  
"Nail-Nut"  
Wood Fibers

### DESCRIPTION OF MATERIAL

Aluminum Stearate  
Nonionic Surfactant  
Barium Sulfate (BaSo4)  
Aragonite (CaCo3)  
Hydrophilite (CaCl2)  
Lime (Quick)  
Anhydrite (CaSO4)  
Carboxymethyl Cellulose  
Potassium Hydrate  
Sodium Hydroxide (NaOH)  
Chrome Lignite  
Chrome Lignosulfonate  
Soap  
Non-toxic, biodegradable defoamer  
Derived from wood pulp  
Sodium montmorillonite, bentonite,  
attapulgite  
CaSo4.2H2O  
Lignite  
Lignosulfonate  
Cement Pre-flush  
Hydroloyzed Cereal solid  
Organo-aluminum complex  
Sodium Acid Pyrophosphate  
Sodium Carbonate  
NaHCO3  
Sodium Carboxymethyl Cellulose  
NaCl  
NaCrO4.10H2O  
Corn Starch  
Biodegradable drilling lubricant  
Biodegradable drilling lubricant  
Oil base mud conc.  
Sacked concentrated oil base mud  
Used to mix certain loss-circulation pills  
Plastic foil, shredded cellophane  
Loss-circulation material  
Surfactant mixed with diesel  
Ground walnut shells  
Loss-circulation material

**J. Connor Consulting**

P.O. Box 218753 Houston, Texas 77218 713-558-0607



**ENVIRONMENTAL REPORT**

**MISSISSIPPI CANYON 487 FEDERAL UNIT**

**UNIT AGREEMENT NO. 754389006**

**OFFSHORE, LOUISIANA**

**Prepared by:**

**J. Connor Consulting  
P.O. Box 218753  
Houston, TX 77218  
713/558-0607**

**April, 1990**

**ATTACHMENT H**

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## I. DESCRIPTION OF PROPOSED ACTION

AEDC (USA) Inc. proposes to conduct initial development activities within the Mississippi Canyon 487 Federal Unit, Unit Agreement No. 7-4389006, Offshore, Louisiana.

As proposed, the Initial Development Operations Coordination Document for Mississippi Canyon 487 Federal Unit provides for the installation of a 12-slot drilling and production platform in Mississippi Canyon Block 485. A total of four (4) development wells will be drilled and produced from this structure, to be designated as Production Platform "A". A 12.750" right-of-way pipeline will be installed to transport produced hydrocarbons from Production Platform "A" in Mississippi Canyon Block 485 to a subsea tie-in with an existing pipeline in Grand Isle Block 94.

At this time, the planned commencement date for proposed activities is on or about September 1, 1990.

### A. DESCRIPTION OF PROPOSED TRAVEL MODES, ROUTES AND FREQUENCY

Support vessels will be dispatched from a support base located in Fourchon, Louisiana. The boats will normally move to the block via the most direct route from Fourchon, Louisiana, however, boats operating in the field may travel from other facilities nearby. Following is an estimate of trips to the proposed operation.

	<u>Drilling Operations</u>	<u>Production Operations</u>
Crew Boat	7 trips per week	1 trip per week
Supply Boat	4 trips per week	2 trips per week
Helicopter	7 trips per week	2 trips per week

### B. ONSHORE SUPPORT BASE

The proposed activities will utilize a support base located at Fourchon, Louisiana. This base provides 24-hour service, a radio tower with phone patch, dock space, office space, parking lot, equipment and supply storage space, drinking and drill water, etc. The proposed development activities will help to maintain this base at its present level of activity. No expansion of the physical facilities or the creation of new jobs is expected to result from the work planned in conjunction with this block.

The first socioeconomic data base report will be submitted when the MMS and the states of Alabama, Louisiana, and Mississippi identify the specific parameters to be addressed in these semi-annual reports.

### C. NEW OR UNUSUAL TECHNOLOGY

No new or unusual technology will be required for this operation.

#### D. VICINITY MAP

Mississippi Canyon 487 Federal Unit is located approximately 46 miles south of the nearest shoreline south of the Louisiana coastline. Water depth varies from approximately 560 feet in the central area of Mississippi Canyon Block 486 to approximately 1760 feet in the northeast corner of Mississippi Canyon Block 487. A vicinity plat showing the proposed surface location of Production Platform "A" in Mississippi Canyon Block 486 relative to the shoreline is included as Attachment M.

### II. DESCRIPTION OF AFFECTED ENVIRONMENT

#### A. COMMERCIAL FISHING

The Gulf of Mexico provides 40% of the commercial fish landings in the continental United States. Louisiana ranked first among Gulf states in total commercial fishery landings for 1987 with nearly 1.8 billion pounds landed, valued at \$316 million. Nationally, the Louisiana catch ranked first in volume and second in value. Cameron, Louisiana was the leading U.S. port in quantity of commercial fish landings.

Louisiana landed 45% of the shrimp, 65% of the oysters, and 80% of the menhaden harvested from the Gulf in 1987. Menhaden represents the highest quantity with 1.6 billion pounds landed and shrimp represents the highest value at \$185 million. In addition, each of the following species accounted for landings valued at over \$1 million: spotted seatrout, red snapper, vermilion snapper, bluefin tuna, black drum, red drum, blue crab, American oyster, and swordfish.

Louisiana is the most productive state in the Gulf of Mexico in terms of commercial fisheries because of its extensive estuaries, coastal marshes, and nutrient input from the Mississippi and Atchafalaya Rivers. Coastal Louisiana contains approximately 60% of the estuaries and marshes in the Gulf of Mexico. Over 90% of the blue crab harvest, which amounts to about 50 million pounds, comes from estuary nursery areas.

#### B. SHIPPING

The establishment of a series of safety fairways or traffic separation schemes (TSS's), and anchorage areas provide unobstructed approach for vessels using U.S. ports. Shipping safety fairways are lanes or corridors in which no fixed structure, whether temporary or permanent, is permitted. TSS's increase navigation safety by separating opposing lanes of vessel traffic. Fairway anchorage are areas contiguous to and associated with a fairway, in which fixed structures may be permitted within certain spacing limitations.

Fairways play an important role in the avoidance of collisions on the OCS, particularly in the case of the large oceangoing vessels, but not all

vessels stay within the fairways. Many others, particularly fishing boats and OCS support vessels, travel through areas with high concentration of fixed structures. In such cases the most important mitigation factor is the requirement for adequate marking and lighting of structures. After a structure has been in place for a while, it often becomes a landmark and an aid to navigation for vessels that operate in the area on a regular basis.

Mississippi Canyon 487 Federal Unit encompasses a number of lease blocks; of which a shipping fairway intersects Mississippi Canyon Block 485. The platform, drilling unit and each of the marine vessels servicing these operations will be equipped with all U.S. Coast Guard required navigational aids to alert ships of its presence in all weather conditions.

### C. LEASURE BOATING, SPORT FISHING AND RECREATION

The northern Gulf of Mexico coastal zone is one of the major recreational regions of the United States, particularly in connection with marine fishing and beach-related activities. The coastal beaches, barrier islands, estuarine bays and sounds, river deltas, and tidal marshes are extensively and intensively utilized for recreational activity by residents of the Gulf South and tourists from throughout the Nation. Publicly-owned and administered areas such as National seashores, parks, beaches, and wildlife lands, as well as specially designated preservation areas such as historic and natural sites and landmarks, wilderness areas, wildlife sanctuaries, and scenic rivers attract residents and visitors throughout the year. Commercial and private recreational facilities and establishments, such as resorts, marinas, amusement parks, and ornamental gardens, also serve as primary interest areas and support services for people who seek enjoyment from the recreational resources associated with the Gulf.

The two major recreational areas most directly associated with the offshore leasing and potentially affected by it are the offshore marine environment and the coastal shorefront of the adjoining states. The only major recreational activity occurring on the OCS is offshore marine recreational fishing and diving. Major sport species sought and caught offshore include snappers, groupers, seatrout, croakers, mackerels, amberjack, cobia, dolphin, tarpon, and billfishes. Studies, reports, and conference proceedings published by NMFS and others have documented a substantial recreational fishery including scuba diving, directly associated with oil and gas production platforms. The recreational fishing associated with oil and gas structures stems from their function as high profile artificial fishing reefs. A report on the 1984 Marine Recreational Fishery Statistics Surveys presented by NMFS at the Sixth Annual Gulf of Mexico Information Transfer Meeting indicates a majority of the offshore recreational fishing in the Central and Western Gulf of Mexico is directly associated with the oil and gas structures. There are currently about 4,000 offshore oil and gas structures in the Central and Western Gulf of Mexico. Many other studies have demonstrated that when oil and gas structures are accessible to marine recreational fishermen and scuba divers they are a major attraction for marine recreational activities and a positive influence on tourism and coastal economics.

With the exception of Grand Isle and vicinity and a stretch of beach area in Cameron Parish, (Peveto/Constance/Ocean View Beaches, Holly Beach, Hackberry Beach) Louisiana has very limited beach area suitable for recreation. Most of it is very narrow, of poor recreational quality and generally inaccessible by automobile. Some of the highest quality beach areas in coastal Louisiana are found along the barrier islands chain off Terrebonne Parish. Several additional significant recreational resources are found along the Gulf Coast. Louisiana has ornamental gardens, scenic roads, rivers, and trails.

#### D. POTENTIAL OR KNOWN CULTURAL RESOURCES

Archeological resources are any objects or features which are man-made or modified by human activity. Significant archeological resources are either historic or prehistoric and, as defined by 36 CFR 60.6, generally include properties greater than 50 years old which are associated with events that have made a significant contribution to the broad patterns of our history; are associated with the lives of persons significant in the past; embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; represent a significant and distinguishable entity whose components may lack individual significance or have yielded, or may be likely to yield, information important to the study or history.

The proposed activity is located outside the Historic and Prehistoric Cultural Resources Study Line, and therefore are in an area where historic and prehistoric resources are considered unlikely to be found. An Archaeological Survey was not required on any lease blocks contained within the Mississippi Canyon 487 Federal Unit.

#### E. ECOLOGICALLY SENSITIVE FEATURES

Barrier beaches are a common landform along the Gulf Coast and stretch in an irregular chain from Florida to Texas. These elongated, narrow landforms are composed of sand and other loose sediments transported by waves, currents, storm surges, and wind. Barrier landforms are a young coastal feature. The term "barrier" identifies the structure as one that protects other features, such as bays, estuaries and marshes, from direct impacts of the open ocean. By separating coastal waters from the ocean, barriers contribute to the amount of estuarine habitat along the coast. As much as two-thirds of the top value Atlantic and Gulf Coast species of fish are considered to be directly dependent during some stage of their life on conditions in these estuaries.

Another benefit of both the islands and their adjacent marshes and bays is that of providing habitats for a large number of birds and other animals, including several threatened or endangered species, for example, the loggerhead turtle, the southern bald eagle, alligators, and brown pelicans. Louisiana has the most rapidly retreating beaches in the nation. The

average retreat for the Fourchon beach over the last 100 years has been in excess of 60 ft/yr. The statewide average according to Dolan et al. (1982) is in excess of 12 ft/yr. Beaches along the deltaic plain in Louisiana fit into one of three categories, depending on the stage of the deltaic cycle that the landmass is experiencing. When a major distributary of the Mississippi River is abandoned, subsidence results in a local sea level transgression that transforms the active delta into an erosional headland with flanking barriers. Fourchon Beach is an example of an eroding headland beach. With increased age and subsidence, the barrier shoreline evolves into a transgressive barrier island arc that is separated from the mainland by a lagoon. Isles Derniers is an example of this phenomenon. Eventually with continued subsidence and sediment deprivation, the island ceases to exist.

The importance of coastal wetlands to the coastal environment has been well documented. Coastal wetlands are characterized by high organic productivity, high detritus production, and efficient nutrient recycling. They provide habitat for a great number and wide diversity of invertebrates, fish, herptiles, birds, and mammals. Wetlands are particularly important as nursery grounds for juvenile forms of many important fish species. The Louisiana coastal wetlands support over two-thirds of the Mississippi Flyway wintering waterfowl population and the largest fur harvest in North America.

Louisiana contains most of the Gulf coastal wetlands. The deterioration of coastal wetlands, particularly in Louisiana, is an issue of concern. In Louisiana, the annual rate of wetlands loss has been measured at 50 square miles for the period 1955-1978.

A recent study funded by MMS entitled "Causes of Wetland Loss in the Coastal Central Gulf of Mexico", examined coastal ecosystems of the Northern Gulf of Mexico region and how wetland habitats have changed as a result of natural processes and man's activities thereon. The study's primary focus was on assessing and quantifying the direct and indirect impacts of OCS-related activities on wetland areas. Canal construction for pipelines and navigation has been the major OCS-related impacting factor.

The shelf and shelf edge of the Central and Western Gulf are characterized by topographic features which are inhabited by benthic communities. The habitat created by the topographic features is important because they support hard-bottom communities of high biomass, high diversity, and high numbers of plant and animal species; they support, either as shelter, food, or both, large numbers of commercially and recreationally important fishes; they are unique to the extent that they are small isolated areas of communities in the vast Gulf of Mexico; they provide a relatively pristine area suitable for scientific research; and they have an aesthetically attractive intrinsic value.

The Central Gulf of Mexico lists 18 topographic features. None of those listed are in or near the vicinity of the proposed operations in the Mississippi Canyon 487 Federal Unit.

#### F. PIPELINES AND CABLES

As a prudent operator, AEDC (USA) Inc. will avoid all pipelines and/or cables in this area while conducting activities associated with the proposed drilling and production operations.

#### G. OTHER MINERAL USES

The activities proposed for Mississippi Canyon 487 Federal Unit will have no direct or indirect impact on other mineral uses.

#### H. OCEAN DUMPING

Ocean dumping is prohibited in this area.

#### I. ENDANGERED AND THREATENED SPECIES AND CRITICAL HABITAT

Six Federally listed endangered whale species may occur in the Gulf of Mexico—the blue, fin, humpback, right, sei, and sperm whales. Generally, these large cetaceans inhabit the continental slope and deep oceanic waters; occasionally they are sighted nearshore. Right whales are the most endangered species in the Gulf of Mexico.

The FWS has designated 15 threatened or endangered species that could be affected by OCS oil and gas operations in the Gulf. All but the American crocodile inhabit the Central and Western Gulf. The list includes three mammals (the jaguarundi, ocelot, and West Indian manatee), seven birds (the bald eagle, arctic skua, whooping crane, brown pelican, eskimo curlew, piping plover, and least tern), and six reptiles (the American crocodile and the hawksbill, Kemp's ridley, loggerhead, leatherback, and green sea turtles).

The green sea turtle is threatened in Louisiana. The Kemp's ridley turtle inhabits shallow water areas from Marsh Island to the Mississippi Delta in Louisiana. Coastal Louisiana appears to be an important subadult and feeding habitat. The hawksbill turtle inhabits reefs, shallow coastal areas, and passes in water less than 15 m deep. The leatherback turtle is the most pelagic marine turtle and may be found near the continental shelf edge. The loggerhead turtle occurs throughout the Gulf and has been observed as far as 500 miles offshore. It is known to frequent natural and manmade structures, including oil and gas platforms.

Brown pelicans are listed as endangered in Louisiana. There are 12 brown pelican rookeries occur on East Island (Terrebonne Parish), Lake Island (St. Bernard Parish), and Queen Bass Island (Jefferson Parish), Louisiana. Endangered bald eagles inhabit the Gulf coastal areas of Louisiana. The piping plover utilizes the beaches, sandflats, and dunes of Louisiana between September and March.

#### J. SOCIOECONOMIC

The offshore oil exploration industry including oil companies, drilling contractors, and oilfield suppliers provide a major input to Louisiana's economy. A number of ports in the Central and Western Gulf have developed into important centers for offshore support. The most active of these in Louisiana are (from east to west) Venice, Morgan City, Intracoastal City, and Cameron, Louisiana. The onshore support base for operations in Mississippi Canyon 487 Federal Unit is Fourchon, Louisiana. Fourchon is almost entirely dependent on the oil and commercial fishing industries for direct and indirect employment in support industries (Gosselink et al., 1979). As previously stated, no new employees will be required for this project, either as drilling crews or in support functions.

### III. UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS

#### A. WATER QUALITY

Development drilling and initial activities associated with placing the development wells on production will temporarily reduce water quality adjacent to the proposed surface locations. This will increase turbidity in a plume down-current from the work site. Released waters and a minor oil spill could also contribute to water quality degradation.

#### B. EFFECTS ON MARINE ORGANISMS

Some organisms will be killed and some will be temporarily functionally impaired as a result of development operations. The most affected groups will be plankton and benthos immediately around the proposed structures. Damage will be both mechanical and toxicological. These impacts are considered to be localized, short term and reversible at the population level.

An oil spill could affect a broad spectrum of marine organisms. However, most effects would be localized and short term. Any effects on mammals and turtles would be significant.

#### C. WETLANDS AND BEACH

In the unlikely event of a spill occurring and reaching shore, organisms in wetland and beach habitats could be killed or functionally impaired. Human community disruption could also occur. Although all such effects would be localized, any effects on endangered species and/or critical habitats would be significant.

#### D. AIR QUALITY

The major impact producing factors on air quality from OCS-related activity are due to combustion, evaporation, or venting of hydrocarbons. The air quality at the lease site will be degraded temporarily during operations, as a result from support vessels (boats and helicopters) as well as from the drilling rig. Anticipated emissions are expected to be below MMS guidelines limits and air quality should return to normal once operations are measurably completed. Offshore activities probably will not affect onshore air quality because of the distance between the drilling rig and shore. Air quality at the onshore base will be only insignificantly reduced by onshore activities. Any such effect will be temporary.

#### **E. COMMERCIAL FISHING**

The major impact producing factors on fishing activities from the proposed operations is structure placement, OCS produced water discharges, sale-related oil spills, and underwater OCS obstructions such as pipelines and debris.

Oil spills that contact the coastal marshes, bays, estuaries, and open Gulf areas with high concentrations of floating eggs and larvae have the greatest potential for damage to commercial fisheries. The majority of the Gulf's fishes are estuarine dependent. An oil spill could seriously affect commercial fisheries such as menhaden, shrimp, and blue crab that use these areas as nursery or spawning grounds.

One production platform with a surrounding 500 ft navigational safety zone, may remove approximately 9 acres of trawling space, and underwater OCS obstructions cause gear conflicts which result in such losses as trawls, shrimp catch, business downtime, and vessel damage.

Commercial fishery resources may also be affected by the discharge of drilling cuts and produced waters. Drilling muds contain material toxic to marine fishes; however, this is only at concentrations four or five orders of magnitude higher than those found more than a few meters from the discharge point. Further dilution is extremely rapid in offshore waters.

The installation of pipelines may contribute to salinity regimes, water current patterns, turbidity and/or wetland/seagrass loss, and, therefore, negatively impact fishery resources.

In conclusion, although these factors impact the commercial fisheries industries, the level of impact is expected to be very negligible.

#### **F. SHIP NAVIGATION**

Very little interference can be expected between the drilling unit, structures and marine vessels utilized during development operations and ships that use established fairways. However, at night and during rough weather, fog, and heavy seas, ships not using established fairways could collide with the structures. Approved aids to navigation will be installed on the drilling unit, structures and all marine vessels servicing these operations in accordance with USCG regulations.

#### G. CULTURAL RESOURCES

There is only a small probability that an unknown cultural resource exists in the lease area.

#### H. RECREATION AND AESTHETIC VALUES

The drilling unit, structures and marine vessels may represent an obstacle to some sport fisherman, but such an effect is expected to be negligible and not permanent.

Even though existing regulations and orders prohibit indiscriminate littering of the marine environment with trash, offshore oil and gas operations involving men, machines, equipment, and supplies is bound to result in some littering of the ocean. Human nature and accidents associated with offshore operations will contribute some floatable debris to the ocean environment which will eventually come ashore on major recreational beaches.

The effects that normal operations or a minor oil spill would have on any fish stocks important to sport fishermen are also considered to be negligible.

A minor oil spill and/or non-petroleum floating debris could foul beaches inshore of the lease area. The fouling of the beaches would be an aesthetic detriment that could adversely affect recreation. Any effects on beach recreation could adversely affect tourism, and consequently, the local economy.

#### **IV. SUMMARY**

The proposed activity will be carried out and completed with the guarantee of the following items.

- A. The best available and safest technologies will be utilized throughout the project. This includes meeting all applicable requirements for equipment types, general project layout, safety systems, and equipment and monitoring systems.
- B. All operations are covered by a Minerals Management Service approved Oil Spill Contingency Plan.
- C. All applicable Federal, State, and Local requirements regarding air emission and water quality and discharge for the proposed activities, as well as any other permit conditions, will be complied with.
- D. The proposed activities described in detail in the Initial Development Operations Coordination Document will comply with Louisiana's Coastal Management Program and will be conducted in a manner consistent with such Program.

#### REFERENCES

1. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 110 and 112, Gulf of Mexico OCS Region, OCS EIS, MMS 86-0087.
2. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 110 and 112, Gulf of Mexico OCS Region, OCS EIS, MMS 86-0087, visuals.
3. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 113, 115, and 116, Gulf of Mexico OCS Region, OCS EIS, MMS 87-0077.
4. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 118 and 122, Gulf of Mexico OCS Region, OCS EIS, MMS 88-0044.
5. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 123 and 125, Gulf of Mexico OCS Region, OCS EIS, MMS 89-0053.

COASTAL ZONE MANAGEMENT  
CONSISTENCY CERTIFICATION

INITIAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

MISSISSIPPI CANYON 487 FEDERAL UNIT

UNIT AGREEMENT NO. 754389006

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

Arrangements have been made with the State Times in Baton Rouge, Louisiana to publish a legal notice no later than April 17, 1990.

Additionally, arrangements have been made with the Daily Comet Newspaper to publish notice of the proposed activities no later than April 17, 1990.

AEDC (USA) Inc. \_\_\_\_\_

*Virayam Thomas*  
Certifying Official

April 11, 1990  
Date

# AEDC (USA) INC.

TELEPHONE:  
713/660-8141

1212 MAIN, SUITE 942  
HOUSTON, TEXAS 77002

FAX:  
713/664-7712

April 11, 1990

State Times  
Legal Ad Department  
Public Notice  
P. O. Box 588  
Baton Rouge, LA 70821

Attention: Ms. Vicky Thompson

Gentlemen:


Please publish the attached notice as a legal ad, no later than April 17, 1990. A copy of the published notice and bill should be submitted to my attention at the following address:

Mr. Hisayasu Tokunaga  
AEDC (USA) Inc.  
1212 Main, Suite 942  
Houston, Texas 77002

If you have any questions please contact me or Ms. Connie Goers of J. Connor Consulting at 713/558-0607.

Sincerely,

AEDC (USA) INC.



Hisayasu Tokunaga  
Executive Vice President

HT:CJG:bb

enclosure

**Public Notice of Federal Consistency Review of a  
Proposed Development Operations  
Coordination Document (DOCD) by the Coastal Management Division/Louisiana  
Department of Natural Resources for the Plan's Consistency with  
the Louisiana Coastal Resources Program.**

**Applicant:** AEDC (USA) Inc.  
1212 Main, Suite 942  
Houston, Texas 77002

**Location:** Mississippi Canyon 487  
Federal Unit Agreement No. 754389006  
Lease offering date January 5, 1984,  
April 24, 1984 and April 22, 1987

**Description:** Proposed DOCD for the above area provides for the development and production of hydrocarbons. Support activities are to be conducted from an onshore base located at Fourchon, Louisiana. No ecologically sensitive species or habitats are expected to be located near or affected by these activities.

A copy of the plan described above is available for inspection at the Coastal Management Division Office located on the 10th floor of the State Land and Natural Resources Bldg., 625 North 4th Street, Baton Rouge, Louisiana. Office hours: 8:00 a.m. to 5:00 p.m., Monday through Friday. The public is requested to submit comments to the Coastal Management Division, Attention: OCS Plans, P. O. Box 44487, Baton Rouge, La. 70804-4487. Comments must be received within 15 days of the date of this notice or 15 days after the Coastal Management Division obtains a copy of the plan and it is available for public inspection. This public notice is provided to meet the requirements of the NOAA Regulations on Federal Consistency with approved Coastal Management Programs.

# AEDC (USA) INC.

TELEPHONE:  
(713) 650-8141

1212 MAIN, SUITE 942  
HOUSTON, TEXAS 77002

FAX:  
(713) 654-7712

April 11, 1990

The Daily Comet  
P. O. Box 5238  
Thibodeaux, LA 70302

Attention: Ms. Doris Dome

Gentlemen:

Please publish the attached notice as a legal ad, no later than April 17, 1990. A copy of the published notice and bill should be submitted to my attention at the following address:

Mr. Hisayasu Tokunaga  
AEDC (USA) Inc.  
1212 Main, Suite 942  
Houston, Texas 77002

If you have any questions please contact me or Ms. Connie Goers of J. Connor Consulting at 713/558-0607.

Sincerely,

AEDC (USA) INC.

*Hisayasu Tokunaga /gg*

Hisayasu Tokunaga  
Executive Vice President

HT:CJG:bb

enclosure

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April 10, 1990

**PROJECTED AIR EMISSION SCHEDULE FOR SUPPLEMENTAL DEVELOPMENT PROJECT****GENERAL INFORMATION**

Location of Facility: Mississippi Canyon 487 Federal Unit  
Unit Agreement No. 754389^05  
Distance Offshore: 46 miles  
Name of Rig/Platform: Jack-Up Rig/Platform  
Operator: AEDC (USA) Inc.  
Contact Person: Connie J. Goers  
Well Footage to be Drilled:  
Date Drilling Will Begin: October, 1990  
Date Production Will Begin: August, 1991

**MAJOR SOURCE (OFFSHORE)**

Power used aboard drilling vessel; approximate footage to be drilled

<u>Emitted Substance</u>	<u>Projected Emissions *tons/yr.</u>
CO	10.09
SO <sub>2</sub>	3.21
NOx	47.40
VOC	3.82
TSP	3.36

\* Based on 60 hphr/ft. from Table 4-3, "Atmospheric Emissions from Offshore Oil and Gas Development and Production", EPA No. 450/3-77-026, June 1977

\*\* Emission factors from Table 3.3.3-1, "Compilation of Air Pollutant Emission Factors", Third Edition, EPA Report AP-42, August, 1977

ATTACHMENT L

Projected Air Emissions  
AEDC (USA) Inc.  
Mississippi Canyon 487 Federal Unit

Page Two

MINOR SOURCES (OFFSHORE)\*

Emitted Substance	Projected Emission (Tons/Year)
	<u>1990</u>
CO	1.03
SO <sub>2</sub>	.03
NOx	.15
VOC	.09
TSP	.02

\* Tables 3.2.1-3, 3.2.3-1 and 2.1-1, "Compilation of Air Pollutant Emission Factors", Third Edition, EPA Report AP-42, August, 1977.

ONSHORE SOURCES

These should be about the same as minor sources unless new facilities are installed at the onshore base. No additional facilities are required or planned at this time.

TRANSPORTATION SERVICES

Supply Boat	- Trips Per Week During Drilling	= 4
	- Trips Per Week During Production	= 2
Crew Boat	- Trips Per Week During Drilling	= 7
	- Trips Per Week During Production	= 1
Helicopter	- Trips Per Week During Drilling	= 7
	- Trips Per Week During Production	= 2

NOTE: Major and Minor Emission figures shown above are the maximum possible value for one year.

EMISSION EXEMPTION DETERMINATION

For CO:  $E = 3400 \times \frac{2}{3} = 3400 (46) = 43,650$  tons/year  
For NOx, VOC, TSP:  $E = 33.3 \times \frac{2}{3} = 33.3 (46) = 1532$  tons/year

As per DOI/MMS regulations, this facility is exempt from further air quality review as it has been determined that its operations will not have a significant adverse impact on air quality.

