OCS-G-8690

#N-3128

In Reply Refer To: FO-2-1

September 23, 1988

Brooklyn Union Exploration Company Inc.
Attention: Mr. G. Ross Frazer
1331 Lamar, Suite 1065
Houston, Texas 77010

Gentlemen:

Reference is made to your Initial Development Operations Coordination Document (DOCD) and accompanying information received September 13, 1988, for Lease OCS-G 8690, Block 253, South Marsh Island Area. This DOCD includes the activities proposed for Platforms A and B and Wells B-1 and B-2.

In accordance with 30 CFR 250.34(f), this DOCD is hereby deemed submitted and is now being considered for approval.

Your control number is N-3128 and should be referenced in your communication and correspondence concerning this DOCD.

Sincerely yours,

For (Orig. Sgd.) A. Donald Giroir
D. J. Bourgeois
Regional Supervisor
Field Operations

bcc: Lease OCS-G 8690 (OPS-3-2) (FILE ROOM)
OPS-3-4 w/Public Info. Copy of the DOCD and accomp. info. (PUBLIC RECORDS)

ADGobert:eck:09/23/88:doodcom

Brooklyn Union Exploration Company, Inc.

1331 LAMAR. SUITE 1065
HOUSTON. TEXAS 77010
(713) 652-2847

September 9, 1988

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, Louisiana 70123-2394

RE: Development Operations Coordination Document
OCS-G 8690, South Marsh Island Area, Block 253
Offshore, Louisiana

Gentlemen:

In accordance with the provisions of Title 30 CFR 250.34, Brooklyn Union Exploration Company, Inc., hereby submits for your review and approval nine (9) copies of a Development Operations Coordination Document for Lease OCS-G 8690, South Marsh Island Area, Block 253, Offshore, Louisiana. Five (5) copies are "Proprietary Information" and four (4) copies are "Public Information".

Brooklyn Union Exploration Company, Inc. anticipates commencing activities under this proposed DOCD on October 15, 1988.

Should additional information be required, please contact our Regulatory Consultant, Ms. Jodie Connor at (713) 558-0607.

Sincerely,

G. Ross Frazer

G. Ross Frazer
Operations Engineer

GRF:JAC:bna
Enclosures
budocd

"Public Information"

DEVELOPMENT OPERATIONS COORDINATION DOCUMENT
BROOKLYN UNION EXPLORATION COMPANY, INC.
BLOCK 253, SOUTH MARSH ISLAND AREA
OCS-G 8690
OFFSHORE, LOUISIANA

In compliance with Title 30 CFR 250.34, the following information is submitted for the Development Operations Coordination Document (DOCD) for Lease OCS-G 8690, South Marsh Island Area, Block 253.

1. Description

Brooklyn Union Exploration Company, Inc. is the designated Operator of South Marsh Island Area, Block 253, OCS-G 8690.

Under the Plan of Exploration, two wells were drilled and completed. A well protector, (platform "B") will be installed over the two wells, (B-1 and B-2). Under the DOCD, Brooklyn Union proposes to install a concrete barge (Platform "A") adjacent to Well Protector Platform "B". A catwalk will be installed from Platform "A" to Platform "B".

Hydrocarbons will be transported via a proposed 6" pipeline from Production Platform "A" in South Marsh Island 253 to Brooklyn Union's existing Platform "A" in South Marsh Island 252.

2. Schedule of Activity

Brooklyn Union's activities under this proposed DOCD for Block 253 will commence October 15, 1988, and extend until November 15, 1988 when production is expected to commence.

The following schedule details the chronological order of the proposed events leading to full production.

	Activity	Approximate start-up Date
A.	Install Platform "B"	October 15, 1988
B.	Install flowline to South Marsh Island 252	November 1, 1988
C.	Hook-up and Commence Production	November 15, 1988

3. Location of the Block, Platform, Wells and Facilities

South Marsh Island Area, Block 253 is located approximately 20 miles east of the Louisiana coastline. Water depth in the block is approximately 20'. A map showing the location of Block 253 relative to the shoreline is attached as Exhibit B.

Brooklyn Union will utilize an existing onshore base located in Freshwater City, Louisiana. This will serve as port of debarkation for supplies and crews. This base is capable of providing the services necessary for drilling, completion and production activities. It has 24-hour service, a radio tower with a phone patch, dock space, equipment and supply storage base, drinking and drill water, etc. During production, the crew boat will make one (1) round trip per week and a supply boat will make one (1) round trip per week. The boat's travel time to Block 253 is approximately 2 - 4 hours. The activities associated with South Marsh Island 253 should not result in any increase in the size and number of onshore support and storage facilities or land and personnel requirements.

4. Geological and Geophysical Data

A structure map is enclosed as Exhibit C. Information regarding geological hazards and surface locations was submitted with the Plan of Exploration.

5. Pollution Prevention Information

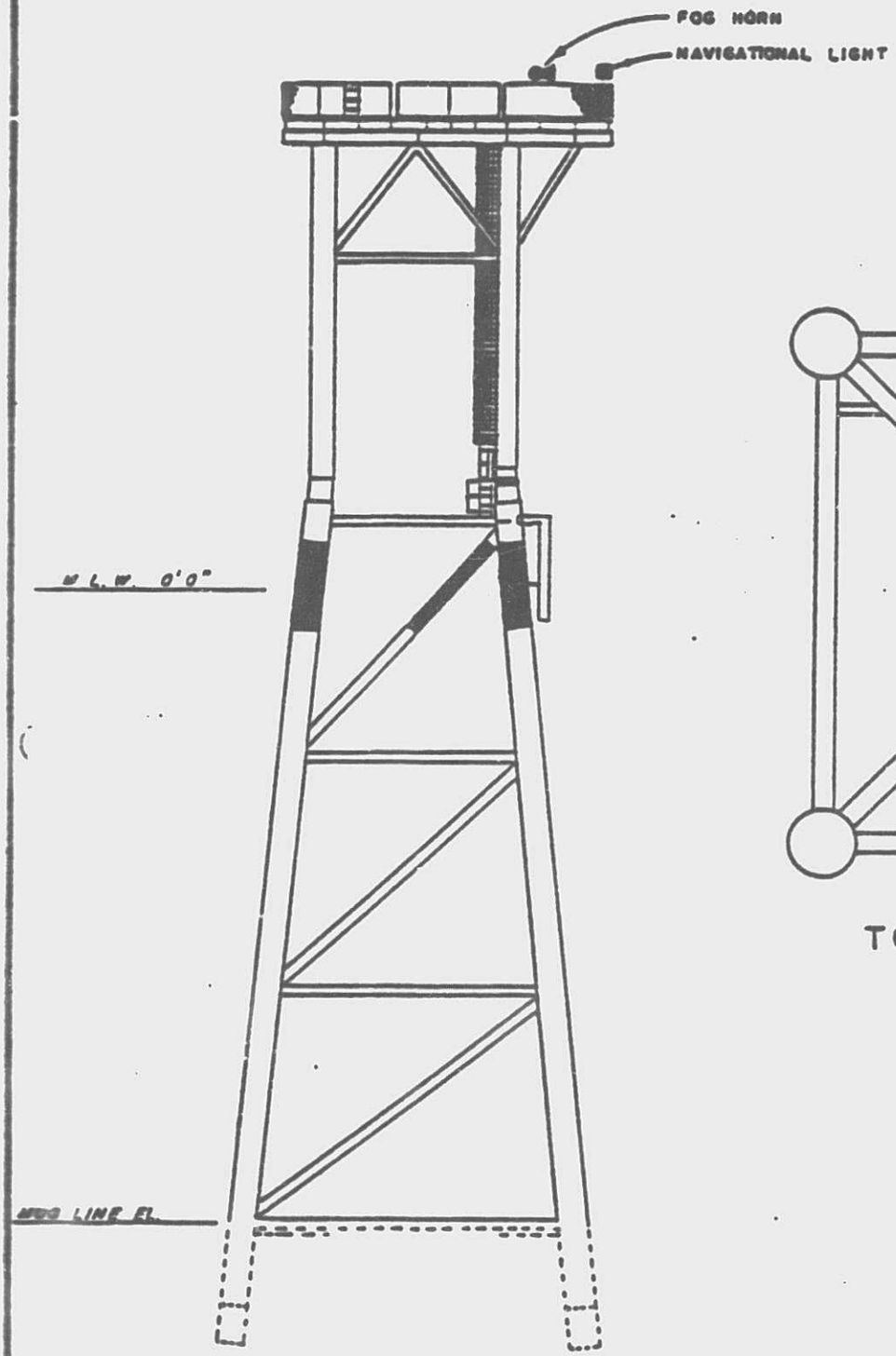
Pollution prevention control measures will be in accordance with 30 CFR 250.40. Brooklyn Union has on file with the MMS an approved Oil Spill Contingency Plan for the Gulf of Mexico. In the event of a spill, this Plan will be actuated. Brooklyn Union is a member of Clean Gulf Associates which provides spill containment equipment and clean-up equipment at service bases located on the Gulf Coasts of Louisiana, Texas, Alabama, Florida and Mississippi. If a spill should occur from the proposed operations, the equipment located at Intracoastal City, Louisiana would be utilized first, with additional equipment moved in from other bases, if necessary. Fast boat response with oil boom, skimmers, pump and storage tanks would require approximately 6-8 hours, including preparation time. A heavy equipment system would require approximately 24-30 hours, including six hours preparation time.

Enclosed are copies of the following information:

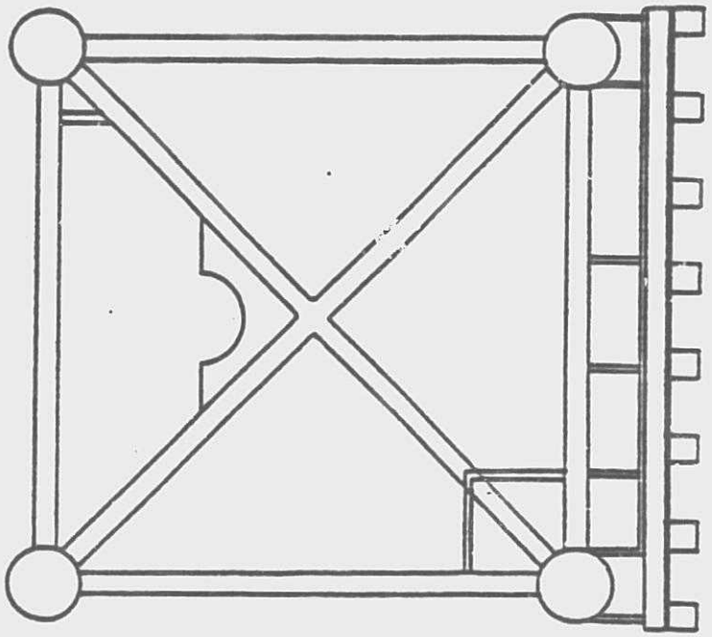
Exhibit

A - Platform Drawings
B - Vicinity Map & Location Plat
C - Structure Map
D - Environmental Report

Also enclosed is the associated Air Quality Review.



SIDE VIEW



TOP VIEW AT EL. + 7'

WELL PROTECTOR

PLATFORM B

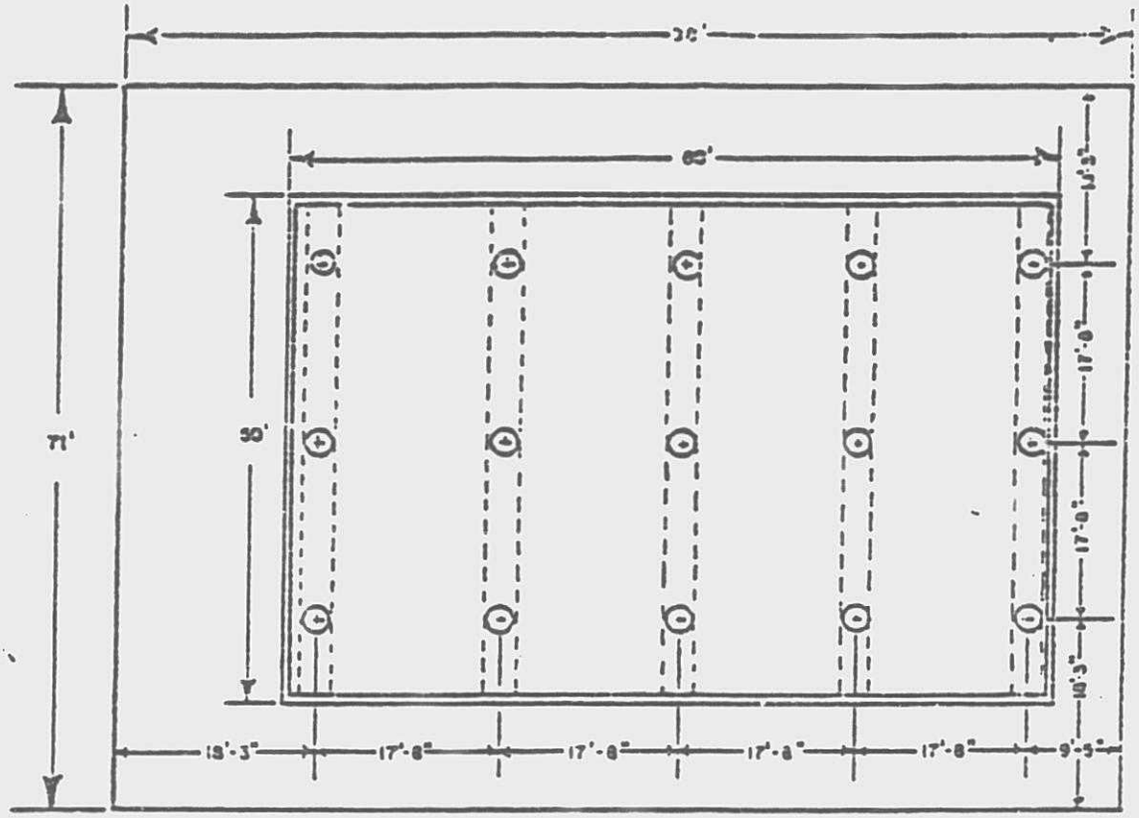
BROOKLYN UNION EXPLORATION COMPANY, INC.

G!' OF MEXICO

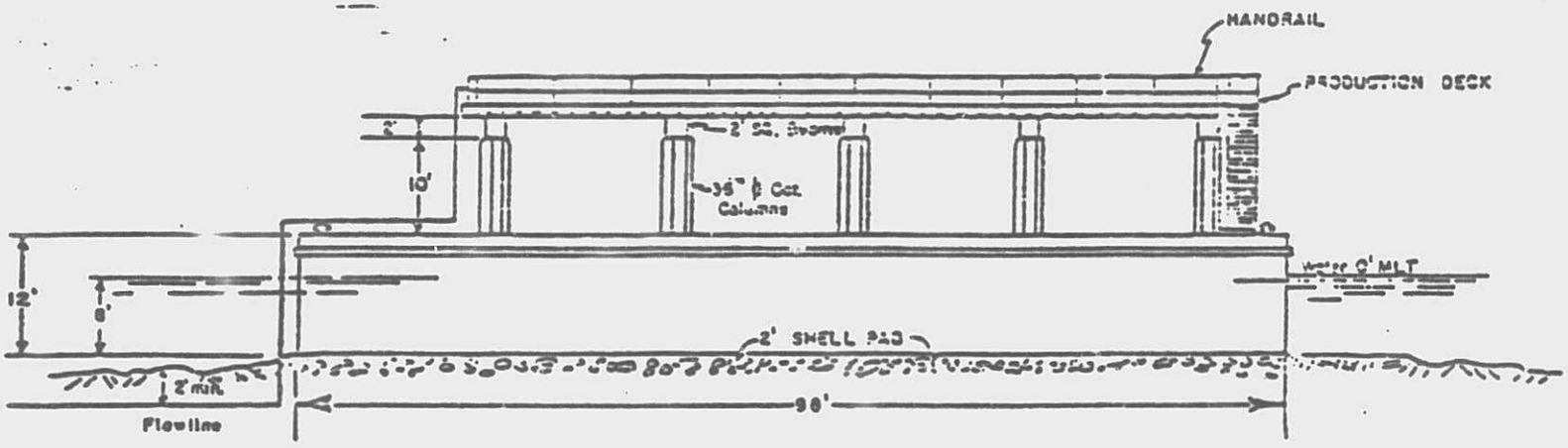
APPLICATION

HOUSTON, TEXAS

ATTACRMENT A



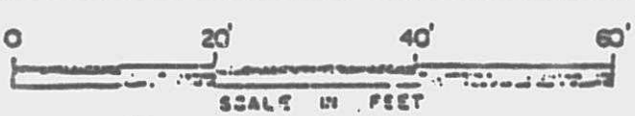
TOP VIEW

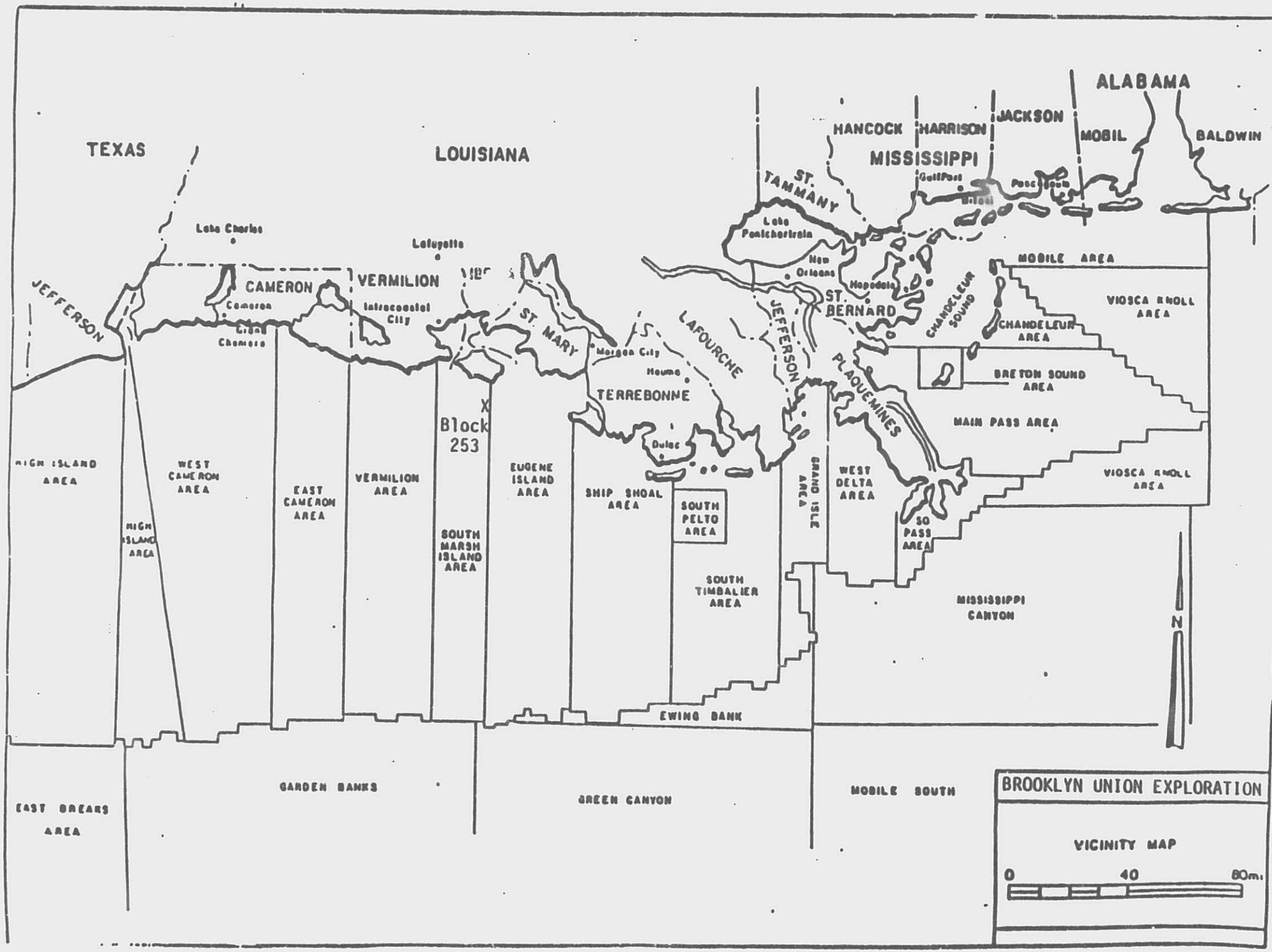


SIDE VIEW

ATTACHMENT A

PRODUCTION PLATFORM BARGE




TEXAS
LOUISIANA
MISSISSIPPI
ALABAMA
HANCOCK
HARRISON
JACKSON
MOBIL
BALDWIN
ST. TAMMANY
Lake Pontchartrain
New Orleans
Hopedale
ST. BERNARD
CHANDELEUR SOUND
MOBILE AREA
VIOSCA KNOLL AREA
CHANDELEUR AREA
BRETON SOUND AREA
MAIN PASS AREA
PLAQUEMINES
JEFFERSON
LAFOURCHE
TERREBONNE
ST. MARY
VERMILION
CAMERON
Lake Charles
Lafayette
Cameron
Intracoastal City
Grand Chenier
Morgan City
Houma
Dulac
Block 253
HIGH ISLAND AREA
WEST CAMERON AREA
EAST CAMERON AREA
VERMILION AREA
SOUTH MARSH ISLAND AREA
EUGENE ISLAND AREA
SHIP SHOAL AREA
SOUTH PELTO AREA
GRAND ISLE AREA
WEST DELTA AREA
SO PASS AREA
SOUTH TIMBALIER AREA
MISSISSIPPI CANYON
EWING BANK
EAST BREAKS AREA
GARDEN BANKS
GREEN CANYON
MOBILE SOUTH
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BROOKLYN UNION EXPLORATION
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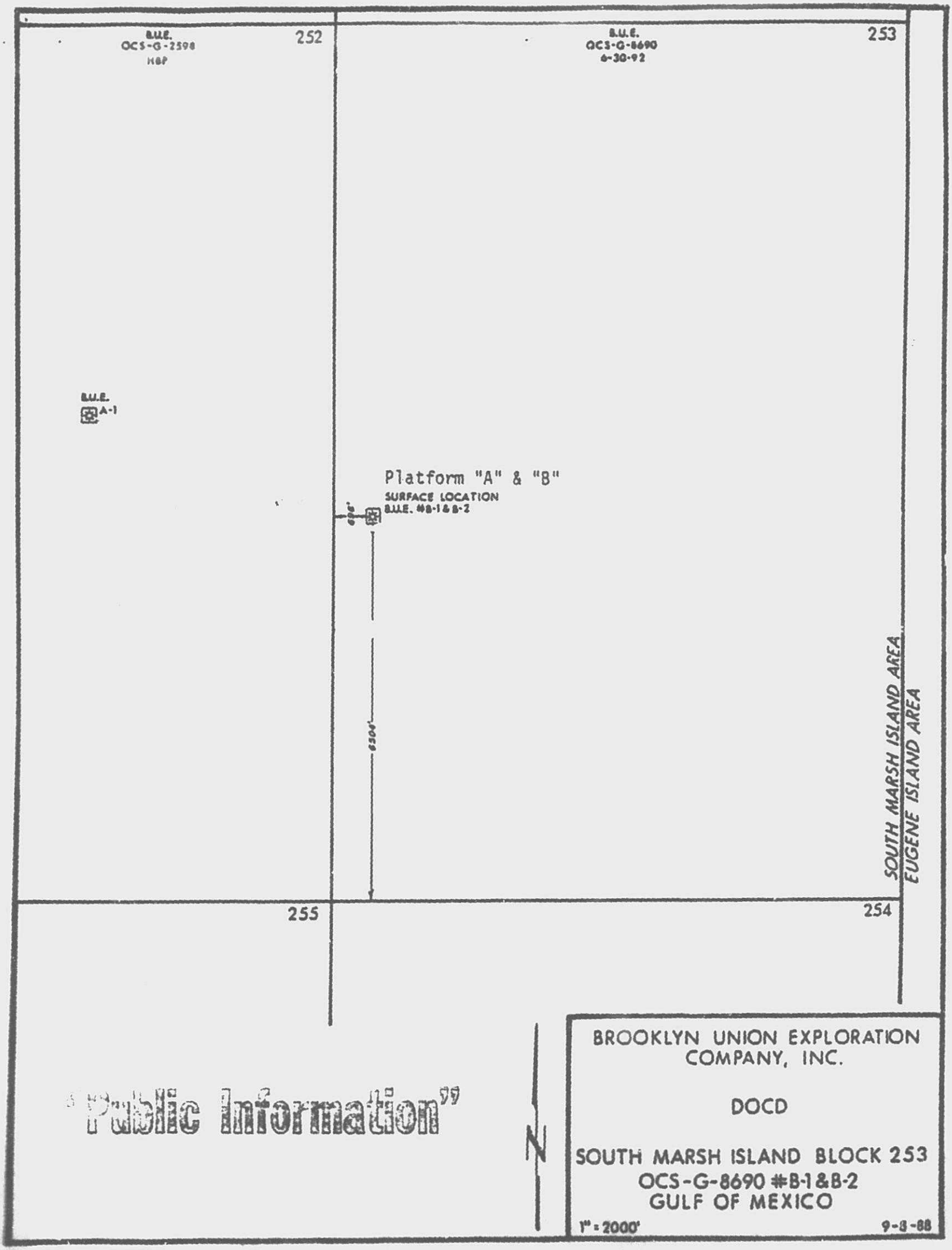

B.U.E.
OCS-G-2598
HBP
252
B.U.E.
OCS-G-8690
6-30-92
253
B.U.E.
A-1
Platform "A" & "B"
SURFACE LOCATION
B.U.E. #B-1 & B-2
6304'
SOUTH MARSH ISLAND AREA
EUGENE ISLAND AREA
255
254
"Public Information"
N
BROOKLYN UNION EXPLORATION COMPANY, INC.
DOCD
SOUTH MARSH ISLAND BLOCK 253
OCS-G-8690 #B-1&B-2
GULF OF MEXICO
1" = 2000'
9-8-88

ENVIRONMENTAL REPORT

FEDERAL LEASE OCS-G 8690

SOUTH MARSH ISLAND BLOCK 253

OFFSHORE, LOUISIANA

THE FOLLOWING ENVIRONMENTAL REPORT WAS PREPARED BY J. CONNOR CONSULTING FOR BROOKLYN UNION EXPLORATION COMPANY, INC. FOR COASTAL ZONE CONSISTENCY DETERMINATION BY THE STATE OF LOUISIANA ON OPERATIONS PROPOSED TO BE CONDUCTED IN THE DEVELOPMENT OPERATIONS COORDINATION DOCUMENT FOR LEASE OCS-G 8690. INQUIRIES REGARDING THIS REPORT PLEASE CONTACT:

BROOKLYN UNION EXPLORATION COMPANY, INC.

1331 LAMAR, SUITE 1065

HOUSTON, TEXAS 77010

ATTENTION: MR. G. ROSS FRAZER

SEPTEMBER, 1988

TABLE OF CONTENTS

I. DESCRIPTION OF PROPOSED ACTION

Brooklyn Union Exploration Company, Inc. (Brooklyn Union) plans to conduct development activities on South Marsh Island Area, Block 253, OCS-G 8690.

As proposed, the Initial Development Operations Coordination Document for South Marsh Island Area Block 253, will include the installation of a concrete barge (Platform "A") adjacent to Well Protector Platform "B". A catwalk will be installed from Platform "A" to Platform "B".

At this time, planned commencement date for development activities is on or about October 15, 1988.

A. DESCRIPTION OF PROPOSED TRAVEL MODES, ROUTES AND FREQUENCY

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

	Production Operations
Crew Boat	1 trip per week
Supply Boat	1 trip per week

B. ONSHORE SUPPORT BASE

The proposed activities will utilize a support base located at Freshwater City, 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.

C. NEW OR UNUSUAL TECHNOLOGY

No new techniques or unusual technology will be required for these operations.

D. VICINITY MAP

South Marsh Island Area Block 253 is located approximately 20 miles offshore Louisiana. Water depth is approximately 20'. See Attachment I.

E. PROPOSED MEANS TO TRANSPORT OIL AND GAS TO SHORE. ROUTES, QUANTITIES

Producible hydrocarbons will be transported via a proposed 6" pipeline from Production Platform "A" in South Marsh Island 253 to Brooklyn Union's existing Platform "A" in South Marsh Island 252.

II. DESCRIPTION OF AFFECTED ENVIRONMENT

A. COMMERCIAL FISHING

The Gulf of Mexico is the single most important area for fisheries production in the United States. In 1985, the total landings of all fisheries in the Gulf was about 2.4 billion pounds, valued at $596 million dockside, and represented about 38% of the total United States landings by pounds and 26% by value. In 1985, the top four U.S. ports in quantity of commercial fishery landings were Cameron, Louisiana; Pascagoula-Moss Point, Mississippi; and Dulac-Chauvin and Empire-Venice, Louisiana.

The Gulf shrimp fishery represents the single most valuable fishery in the United States with landings (heads removed) averaging approximately 230 million lbs/yr. The major shrimp species include brown, white, and pink shrimp. In 1981 production reached almost 270 million pounds worth over $401 million dockside. In addition to shrimp, the blue crab significantly contributes to the Gulf's crustacean landings. In 1985, about 56 million pounds of blue crabs, worth about $16 million, were taken in the Gulf's nearshore estuaries and sounds. Oysters are the main mollusk harvested in the Gulf's nearshore estuaries and sounds, and oyster landings in 1985 were approximately 26.5 million pounds valued at about $41 million.

In the Gulf the following commercial fishes were the most economically important in 1985 and are arranged in order of decreasing priority: gulf menhaden, groupers and scamp, red snapper, black mullet, red drum, yellowfin tuna, catfish and bullheads, swordfish, black drum, spotted seatrout, yellowtail snapper, pompano, vermillion snapper, and king mackerel and cero.

The menhaden purse seine fishery is the most important fishery in terms of pounds landed. In 1985, 1.9 billion pounds valued at $67 million were landed in the Gulf. Menhaden are used in the manufacture of fish meal and solubles for additives to livestock feeds, and production of fish oil. Also, small amounts are used for bait and canned pet food.

The industrial bottomfish trawl fishery produces stock for the pet food industry, bait, animal food, and fishmeal. This fishery reached peak production in the early 1970's at about 115 millions pounds, worth about $2.8 million; however, it has declined in recent years.

Shrimp is by far the most valuable component of the Louisiana landings. The menhaden fishery is the largest in terms of pounds landed. In 1985, the total commercial landings for Louisiana were about 1.7 billion pounds, worth $229 million. Louisiana ranked first in the United States in pounds landed and second in value

B. SHIPPING

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, such as fishing boats and OCS support vessels, travel through areas with high concentrations 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.

South Marsh Island 253 is clear of all shipping fairways and anchorage areas. The platform and each of the marine vessels servicing this operation will be equipped with all U. S. Coast Guard required navigational safety aids.

C. PLEASURE 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 shorefronts along the Gulf coasts of Alabama, Mississippi, Louisiana, and Texas offer a diversity of natural and developed landscapes and seascapes. 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, as well as from foreign countries. 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 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. Studies, reports, and conference proceedings published by MMS 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 Gulf of Mexico is directly associated with 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 are 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

Archaeological resources are any objects or features which are man-made or modified by human activity. Significant archaeological 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 distinction; or have yielded, or may be likely to yield, information important in prehistory or history.

Although most historic archaeological resources on the OCS are shipwrecks, other types of historic sites, such as the Ship Shoal Lighthouse, may occur in Federal waters.

Figures indicate that less than 2% of pre-20th century ships reported in the Gulf and less than 10% of all ships reported lost between 1500 and 1945 have known locations. Considering the problems with inaccurate wreck reporting, drift and breakup of wrecks, and ships which have been lost but never reported, it becomes apparent that very little is really known about the locations of historic shipwrecks in the Gulf of Mexico.

In order to deal with the management problems of this largely unlocated resource base, a high probability zone for the occurrence of shipwrecks (Zone 1) was proposed by the baseline study (CEI, 1977). This zone was delineated by using geographic factors, such as approaches to seaports, straits, shoals, reefs, and historic shipping routes, as indicators of high shipwreck potential.

Required remote sensing surveys on the OCS have recorded evidence of approximately 57 potential wrecks. Ten of these are definite wrecks while the remaining 47 would require further investigation for positive identification. Eighty percent of these possible wrecks were recorded within Zone 1 which, according to the baseline study, is where the highest incidence of shipwrecks should occur.

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. In geological terms, barrier islands are a young phenomenon, being formed only in the last 5000 to 6000 years. The term "barrier" identifies the structure as one that protects other features, such as bays, estuaries, and marshes, from direct wave attack of the open ocean. The waters in these bays and estuaries are a blend of the terrestrial-freshwater systems of the mainland and the saltwater system of the ocean, and among the richest ecosystems known. Many of the species that inhabit the bays, estuaries, and adjacent marshes use these areas as spawning, nursery, and feed grounds.

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. The islands also provide habitat for several threatened or endangered species, for example, the loggerhead turtle, the southern bald eagle, alligators, and brown pelicans.

The shelf and shelf edge of the Central and Western Gulf are characterized by topographic features which are inhabited by benthic communities. The benthic organisms on these features appear to be depth related; however, the actual limiting factors are temperature and light penetration (turbidity and sedimentation).

The Central Gulf of Mexico lists 16 topographic features.

Shelf Edge Banks	Midshelf Banks
Bright Bank	Sonnier Bank
McGrail Bank	29 Fathom Bank
Rankin Bank	Fishnet Bank
Alderdice Bank	
Rezak Bank	
Sidner Bank	
Ewing Bank	
Jakkula Bank	
Bouma Bank	
Parker Bank	
Sackett Bank	
Diaphus Bank	
Sweet Bank	

F. PIPELINES AND CABLES

A 4-inch gas pipeline leaves the "A" Platform in Block 252 and crosses the west line approximately 1000' from the north line.

South Marsh Island 253 is clear of all pipelines and cables.

Brooklyn Union as a prudent operator will avoid all pipelines and cables in this block during development activities.

G. OTHER MINERAL USES

The activities proposed for South Marsh Island 253 will have no direct or indirect impact on other mineral uses.

H. OCEAN DUMPING

Ocean dumping is prohibited in this area.

I. ENDANGERED OR THREATENED SPECIES AND CRITICAL HABITAT

Five federally listed endangered whale species occur within the Central Gulf. These include fin, humpback, right, sei, and sperm whales. Generally, these large cetaceans inhabit the continental slope and deep oceanic waters, occasionally they are sighted nearshore (Schmidly, 1981). Sperm whales have been sighted near the Louisiana Delta and offshore Brownsville (Fritts et al., 1983).

Four federally listed endangered turtle species (Kemp's ridley, green, hawksbill, and leatherback turtles) and one threatened species (loggerhead turtle) occur in the Gulf of Mexico.

The American alligator occurs generally throughout the Central Gulf coastal areas. The alligator is listed as endangered throughout its range except in the coastal areas of Florida and Texas where it is listed as threatened and in Louisiana where it is listed as "threatened by similarity of appearance".

The red-cockaded woodpecker occurs primarily in mature open pine forest throughout the Eastern and Central Gulf area and into eastern Texas.

Arctic peregrine falcons migrate along the eastern coast of Florida, the Florida Keys, and the Gulf coast of Texas. Some peregrine falcons overwinter along the Gulf coastal areas.

The endangered eskimo curlew's northward migration corridor crosses the Louisiana and Texas coastal areas.

Brown pelican's occur along the coast of Cameron Parish, Louisiana. Bald eagles inhabit several Gulf coastal counties.

These species may be affected by the development of coastal lands and/or the occurrence of oil spills which may affect the species directly or through their food sources. Since the proposed activities include no plans for the development of the coastal lands, the impact on endangered or threatened species is primarily based on the occurrence of oil spills.

Brooklyn Union as a prudent operator, will take the necessary measures to reduce the probability of oil spills. Brooklyn Union's proposed development

operations on Block 253 should not pose a threat to any endangered or threatened species.

III. UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS

A. WATER QUALITY

Production activities will temporarily reduce water quality adjacent to the location. 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 platform. Damage will be both mechanical and toxicological. Discharge of hole cuttings will damage plankton within the plume and bury some of the less mobile benthic fauna. 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 air quality at the lease site will be degraded temporarily during operations, but should return to normal once operations are measurably completed. Offshore activities probably will not affect onshore air quality. Air quality at the onshore base will be only insignificantly reduced by onshore activities. Any such effect will be temporary.

E. COMMERCIAL FISHING

Of the various types of fishing gear in use in the OCS areas, trawls have the greatest chance for operational conflicts with oil and gas activities. Losses may, however, be compensated under the Fishermen's Contingency Fund or other legal routes. Trawl nets can be snagged on underwater stubs causing damage or loss of the nets. In addition, it is conceivable that snags could damage

underwater production equipment or pipelines causing a spill of oil or gas. Because safety equipment is installed, which shuts in production when a loss of pressure occurs, the likelihood of a major spill resulting thereby is considered very small. Less frequently, large objects which were lost overboard from petroleum industry boats, pipeline lay barges, and platforms are caught by fishing gear resulting in damage to the gear and/or its catch of fish; however, occurrence of this type of incident is low. Also, commercial fishermen would probably not harvest fish in the area of an oil spill, as spilled oil could coat or contaminate commercial fish species rendering them unmarketable. Other unavoidable adverse impacts include loss of fish space caused by installation of unburied pipelines, rigs, platforms, or by other OCS-related structures. There may be some localized competition for shore facilities. These effects and any effect that the development operations will have on stocks of important species are considered minor.

F. SHIP NAVIGATION

Very little interference can be expected between the platform and marine vessels utilized during production 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 platform.

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 platform 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 Development Plan 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 94, 98 and 102, Gulf of Mexico OCS Region, OCS EIS, MMS 84-0057.

2. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 94, 98 and 102, Gulf of Mexico OCS Region, OCS EIS, MMS 84-0057, visuals.

3. Fisheries of the United States, 1985, April, 1986.

4. The Ecology of Petroleum Platforms in the Northwestern Gulf of Mexico: A Community Profile, Bureau of Land Management Open File Report 82-03, July, 1982.

5. Environmental Report West Cameron Area Blocks 516 and 524, March, 1987.

6. BLM Draft Environmental Impact Statement, OCS Oil and Gas Lease Sales A-62 and 62.

7. BLM Final Environmental Impact Statement, OCS Oil and Gas Lease Sales A-62 and 62.

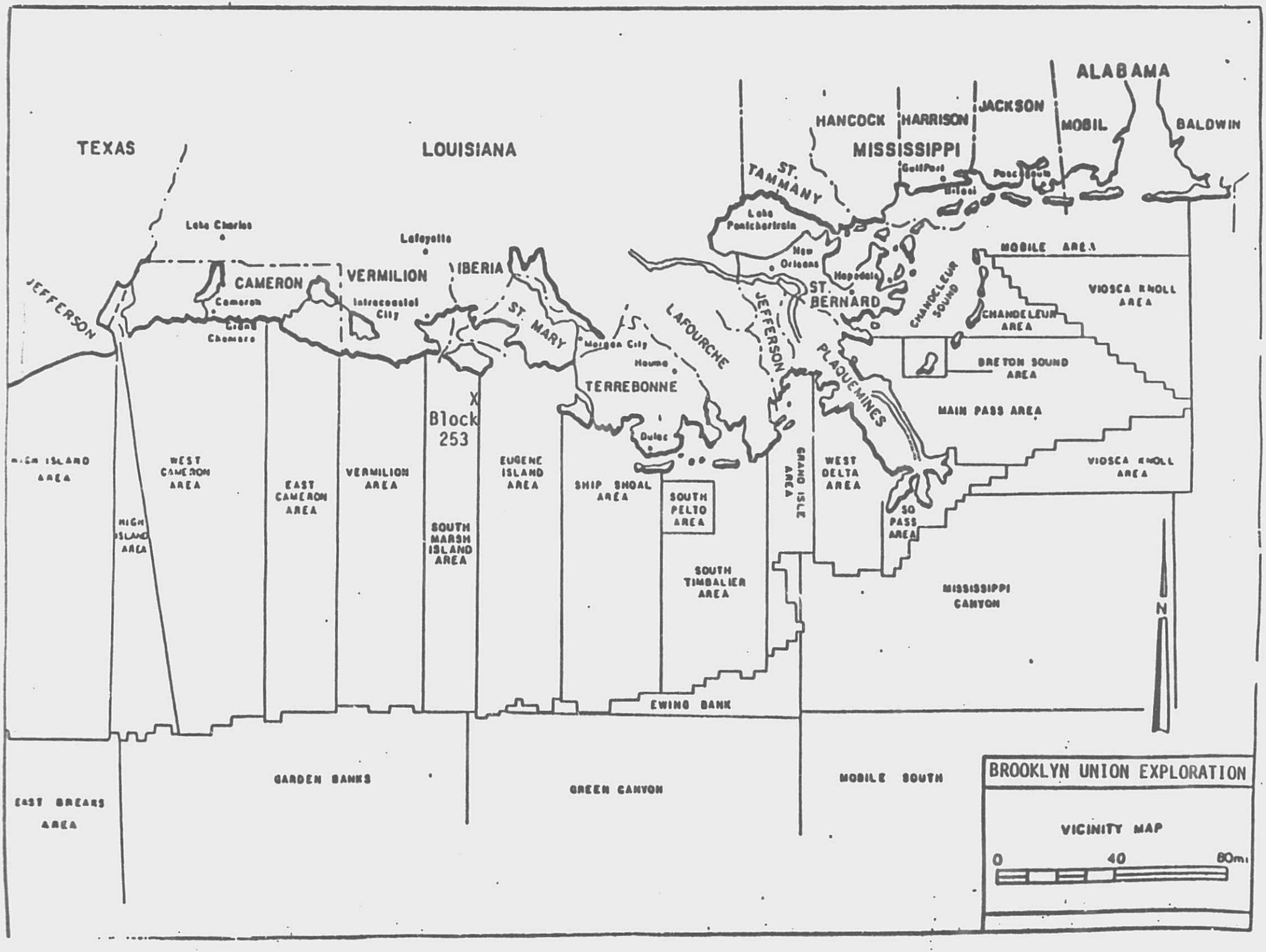
8. BLM Final Environmental Impact Statement, OCS Oil and Gas Lease Sale 47.

9. Minerals Management Service, 1983. Final Regional Environmental Impact Statement, Gulf Of Mexico. U.S. Department of the Interior.

10. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 110 and 112, Gulf of Mexico OCS Region, OCS EIS, MMS 86-0087.

11. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 110 and 112, Gulf of Mexico OCS Region, OCS EIS, MMS 86-0087, visuals.

12. Final Environmental Impact Statement, Proposed Oil and Gas Lease Sales 113, 115 and 116, Gulf of Mexico OCS Region, OCS EIS, MMS-87-0077.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Lafayette
JEFFERSON
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J. Connor Consulting

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

September 9, 1988

PROJECTED AIR EMISSION SCHEDULE FOR DEVELOPMENT/PRODUCTION PROJECT

GENERAL INFORMATION

Location of Facility:	South Marsh Island 253 OCS-G 8690
Distance Offshore:	20 miles
Name of Platform:	Platform "A" & "B"
Operator:	Brooklyn Union Exploration Co., Inc. 1331 Lamar, Suite 1065 Houston, Texas 77010
Contact Person:	Mr. G. Ross Frazer
Date Production Will Begin:	November 15, 1988

MINOR SOURCES (OFFSHORE)*

Emitted Substance	Projected Emissions (tons/year) 1989**
CO	.021
SO_2	---
NOx	.147
VOC	.008
TSP	---

* 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.

** The production emissions are the maximum possible values for one year. Most emissions will occur during installation operations.

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.

EMISSION EXEMPTION DETERMINATION

For CO: $E = 3400^{2/3} = 3400(20)^{2/3} = 25,051$ tons/year

For NOx, VOC, TSP & SO$_2$: $E = 33.3D = 33.3(20) = 666$ tons/year

PREDICTED PRODUCTION ACTIVITY AT PLATFORM

Gas Production, Platform "A" = MMCF/D
Date Production Will Begin = November 15, 1988

TRANSPORTATION SERVICES

Crew Boat (2500 hp)
Trips Per Week During Production - 1
Supply Boat (2500 hp)
Trips Per Week During Production - 1

METHODOLOGY

Platform: Horsepower - hour method
Boats: Horsepower - hour method

REFERENCES

Production - EPA 450/3-77-026 (June, 1977) - "Atmospheric Emissions from Offshore Oil and Gas Development and Production", pp. 81-116.
Boats - EPA Report AP-42 - "Compilation of Air Pollutant Emission Factors", 3rd Edition, (August, 1977), pp. 116, 125 and 127

FINDINGS OF AIR QUALITY REVIEW

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 environmental impact on air quality.

COASTAL ZONE MANAGEMENT

CONSISTENCY CERTIFICATION

DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

SOUTH MARSH ISLAND 253

OCS-G 8690

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

Brooklyn Union Exploration Co., Inc.
Lessee or Operator

G. Ross Francyk
Certifying Official

September 9, 1988
Date