

UNITED STATES GOVERNMENT
MEMORANDUM

August 28, 2020

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

Subject: Public Information copy of plan
Control # - N-10112
Type - Initial Development Operations Coordinations Document
Lease(s) - OCS-G34886 Block - 74 Mississippi Canyon Area
Operator - LLOG Exploration Offshore, L.L.C.
Description - Subsea Well No. 001
Rig Type - DP Semisubmersible and Drillship

Attached is a copy of the subject plan.

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

Chiquita Hill
Plan Coordinator

Site Type/Name	Botm Lse/Area/Blk	Surface Location	Surf Lse/Area/Blk
WELL/001	G34886/MC/74	4607 FNL, 3732 FEL	G34886/MC/74

**OCS-G-34886 LEASE
MISSISSIPPI CANYON BLOCK 74
INITIAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT**

**FINAL AMENDED COPY
July 9, 2020
RECORD OF CHANGES**

DATE	SECTION-PAGE	BRIEF SYNOPSIS
06/29/2020	Appendix O	Added statement to Appendix O – Vessels/rigs WILL NOT transit the Byrde’s whale area.

**LLOG Exploration Offshore, L.L.C.
1001 Ochsner Blvd. Suite 200
Covington, Louisiana 70433**

**INITIAL
DEVELOPMENT OPERATIONS COORDINATION
DOCUMENT**

**Mississippi Canyon Block 74
OCS-G-34886 Lease
Praline**

PUBLIC INFORMATION COPY

PREPARED BY:

**Nelda Runyon
Regulatory Specialist
LLOG Exploration Offshore, L.L.C.
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**Dated: May 27, 2020
Amended: June 29, 2020**

**LLOG EXPLORATION OFFSHORE, L.L.C.
INITIAL
DEVELOPMENT OPERATIONS COORDINATION DOCUMENT**

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History of Lease

LLOG was designated as the Operator of OCS-G 34886, Mississippi Canyon Block 074 on December 1, 2016.

The Mississippi Canyon Block 74 Well No. 1 spud on April 29, 2017 and was temporarily abandoned on May 19, 2017. Completion operations for the Mississippi Canyon Block 74 Well No. SS001 are scheduled to commence on/or about July 25, 2020 as approved under LLOG's Revised Exploration Plan (R-6868) approved on July 26, 2019.

The OCS-G-27259 Lease, Mississippi Canyon Block 74 Well No. SS001 production will be via proposed Right of Way bulk pipeline with associated umbilicals/jumper to transport production from OCS-G-34886 Lease, Mississippi Canyon Block 74 to the OCS-G-06898 Lease, Viosca Knoll Block 989 "A" Platform.

APPENDIX A
PLAN CONTENTS
(30 CFR PART 550.211 and 550.241)

A. *Plan Contents*

This Initial Development Operations Coordination Document is to cover the hook up and commencement of production from the Mississippi Canyon Block 74 Well No. SS001 OCS-G-34886 Lease to the OCS-G-06898 Lease, Viosca Knoll Block 989 “A” Platform.

An approximate 69,210’ long pipe-in-pipe ROW pipeline (Flowline: 6.625 O.D., Casing: 10.75” O.D.) ROW pipeline will be installed (via dynamically positioned pipe lay vessel) to transport production from the OCS-G 34886, Lease Mississippi Canyon Block 74 to the OCS-G 06898 Lease, Viosca Knoll Block 989 “A” Platform.

An approximate 72,320’ long x 5” Umbilical from the Viosca Knoll 989 “A” production platform to an Umbilical Termination Assembly in Mississippi Canyon 74 will be installed.

An approximate 19,308’ long x 3.46” umbilical (“In-Line-Sled ILS) that originates at the Viosca Knoll “A” (Pompano) platform and terminates at the flowline ILS from platform in Mississippi Canyon 28.

An approximate 60.45’ long x 6.625” Right of Way Well Jumper at Mississippi Canyon Block 74 Block Well SS001.

The proposed operations will not utilize pile-driving, nor is LLOG proposing any new pipelines expected to make landfall.

Conservation Information Document (CID) that discusses the depletion plans of this well has been filed under separate cover.

Included as **Attachment A** is Form BOEM 137 “OCS Plan Information Form”, which provides for the installation of the well jumper and to commence production from the associated well.

B. Location

Included are the following attachments:

- Attachment A-1: Form MMS 137 – OCS Plan Information Form*
- Attachment A-2: Well Location Plats – MC74 Well No.SS001*
- Attachment A-3: Bathymetry Map*
- Attachment A-4: Cost Recovery Payment – Paygov receipt \$4,238.00*
- Attachment A-5: Field Development Plan*

C. Safety and Pollution Prevention Features

No additional drilling operations will be conducted under this Initial Development Operations Coordination Document.

Safety of personnel and protection of the environmental during the proposed operations are a primary concern for LLOG.

Safety features on the platform will include well control, pollution prevention, and blowout prevention equipment as described in Title 30 CFR Part 250, Subparts C, D, E and G; and further clarified by BOEM's Notices to Lessees, and currently policy making involved by BOEM, EPA and USCG. Appropriate life rafts, life jackets, ring buoys, etc. will be maintained on the facility at all times.

Pollution prevention measures include installation of curbs, gutters, drip pans, and drains on the drilling deck areas to collect all contaminants and debris.

D. Storage Tanks and Production Vessels

Not Applicable – No additional storage tanks or vessels.

E. Pollution Prevention Measures

Not applicable. The State of Florida is not an affected State by the proposed activities in this plan.

F. Additional Measures

LLOG does not propose any additional safety, pollution prevention, or early detection measures, beyond those required in 30 CFR 250.

G. Cost Recovery Payment

Included as Attachment A-4 is the Pay.gov receipt the amount of \$4,238.00 for cost recovery fee associated with the Initial Development Operations Coordination Document for the OCS-G-34886 Lease, Mississippi Canyon Block 74 Well No. SS001.

OCS PLAN INFORMATION FORM

Attachment A-1 (Proprietary Information)

OCS PLAN INFORMATION FORM

General Information									
Type of OCS Plan:		Exploration Plan (EP)		Development Operations Coordination Document (DOCD)					
Company Name:				BOEM Operator Number:					
Address:				Contact Person:					
				Phone Number:					
				E-Mail Address:					
If a service fee is required under 30 CFR 550.125(a), provide the				Amount paid				Receipt No.	
Project and Worst Case Discharge (WCD) Information									
Lease(s):		Area:		Block(s):		Project Name (If Applicable):			
Objective(s)	Oil	Gas	Sulphur	Salt	Onshore Support Base(s):				
Platform/Well Name:			Total Volume of WCD:				API Gravity:		
Distance to Closest Land (Miles):				Volume from uncontrolled blowout:					
Have you previously provided information to verify the calculations and assumptions for your WCD?							Yes	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	No	
Do you propose to use a vessel with anchors to install or modify a structure?							Yes	No	
Do you propose any facility that will serve as a host facility for deepwater subsea development?							Yes	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									
Well completion									
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									
Other (Specify and attach description)									
Description of Drilling Rig					Description of Structure				
Jackup		Drillship			Caisson		Tension leg platform		
Gorilla Jackup		Platform rig			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-G-34886 LEASE
MISSISSIPPI CANYON BLOCK 74
INITIAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT**

ACTIVITY SCHEDULE

<i>Proposed Activity</i>	<i>Start Date</i>	<i>End Date</i>	<i>No. of Days</i>
Right of Way Pipeline	11/15/2020	11/30/2020	15
Associated Umbilical	3/15/2021	04/02/2021	17
MC 74 Well SS001 ROW Jumper	04/02/2021	4/5/2021	3
Hook-up and commence production		4/15/2021	

WELL LOCATION PLAT

Attachment A-2 (Provide Information Here)



No. 001 ST00 BP00	
Well Surface	
NAD27 BLM16 Feet	
X:	1,168,428.00
Y:	10,497,312.09
Lat:	28°55'03.6934"N
Lon:	88°28'32.6784"W
NAD83 BLM16 Feet	
X:	1,168,433.93
Y:	10,497,971.82
Lat:	28°55'04.5214"N
Lon:	88°28'32.7275"W

4607.91'

3732.00'

MC74
OCS-G-34886
LLOG

I HEREBY CERTIFY THAT THE ABOVE WELL SURFACE LOCATION IS CORRECT.



Mark Buhrke 11/27/17
MARK KEITH BUHRKE RPLS #5092
STATE OF TEXAS
FIRM REGISTRATION NO. 10051201

NOTES

1. THIS PLAT WAS PREPARED FOR PERMIT PURPOSES ONLY, AND IS NOT A PROPERTY BOUNDARY SURVEY.
2. COORDINATES TRANSFORMED USING NADCON (VER. 2.1).

PUBLIC INFORMATION



FINAL LOCATION
OCS-G-34886 WELL No. 001 ST00 BP00
BLOCK 74
MISSISSIPPI CANYON AREA
GULF OF MEXICO

Geodetic Datum: NAD27
Projection: BLM 16 (NORTH)
Grid Units: US SURVEY FEET

SCALE 0 2000
1:24000 FEET



FUGRO USA MARINE, INC.
6671 Southwest Freeway #700
Houston, Texas 77074
(713) 346-3700

Job No.: 17170762 Date: 11/22/2017

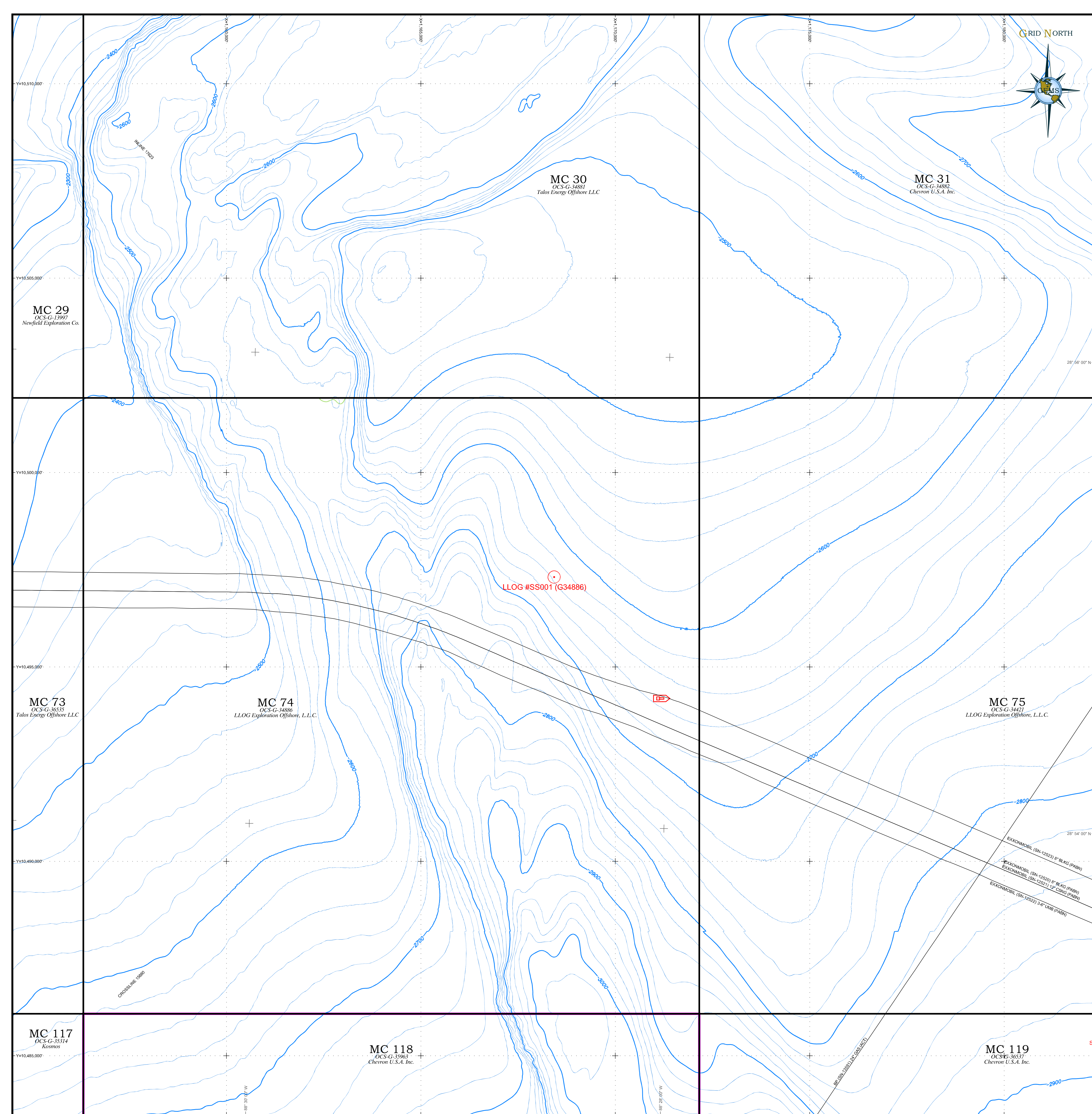
Drwn: EA

Chart: 1 Of: 1

DWG File: 1717076201_MC74_F_1_G34886

BATHYMETRY MAP

Attachment A-3 (Provide Information Eqr {)



MAP INFORMATION

- GEOGRAPHIC TICK REFERENCE.
- GEODETIC (LAT/LONG) TICK REFERENCE.
- EXISTING WELL LOCATION, AS REPORTED BY BOEM.
- EXISTING PIPELINE/CABLE LOCATION, AS REPORTED BY BOEM.
- KNOWN SHIPWRECK AS REPORTED BY NOAA.
- DESIGNATED DEEPWATER BENTHIC COMMUNITY BLOCK.
- WATER DEPTH CONTOUR IN FEET.

MAP SCALE

SCALE 1 : 12,000
SCALE 1" = 1,000'

NOTES

- ALL BLOCKS IN THE MISSISSIPPI CANYON PROTRACTION AREA ARE DESIGNATED AS ARCHAEOLOGICALLY SIGNIFICANT (BOEM, 2011).
- INFRASTRUCTURE INCLUDED ON THIS MAP IS BASED ON INFORMATION OBTAINED FROM THE BOEM DATABASE (BOEM, 2020b). FILE UPDATED MARCH, 2020.

GEODETIC INFORMATION

DATE: MAR 27	ELLIPSOID: CLARKE 1866	PROJECTION: UTM	GRID UNITS: US FEET
ZONE: 18	CENTRAL MERIDIAN: 87° 00' 00" W	FALSE EASTING: 165016.671 AT G.M.	FALSE NORTHING: 00000.00' N

MAPPING INFORMATION

PROJECT NO.: 0302-2056	INTERPRETER: Y. OYEDOLE	ISSUE DATE: 9 APRIL 2020
FILE NAME: 2056_WELLS.DWG	DRAFTED BY: D. ADAMS	CHECKED BY: J. HOPFMAN
ISSUE NO.: 1	COMMENTS:	

GRID & CONTOUR INFORMATION

CONTOUR INTERVAL: 20 FEET	VERTICAL DATUM: SEA SURFACE	VELOCITY: SEE APPENDIX C
GRID SPACING: 10 X 10 FT	SEARCH RADIUS: 15 X 15 FT	GRID METHOD: VIKING

DISCLAIMER

The data stated herein may contain, in part or in whole, information provided by third parties. It is recognized and agreed that GEMS may rely upon such information without any obligation to independently verify the same. The data contained herein and any estimates, recommendations, opinions and decisions by GEMS are made on the basis of GEMS's experience, qualifications, and professional judgment and are not to be construed as warranties or guarantees. GEMS makes no warranty or guarantee, express or implied, regarding the data contained herein.

**LLOG EXPLORATION
OFFSHORE, L.L.C.**

BATHYMETRY MAP

**WELLSITE #SS001
BLOCK 74
MISSISSIPPI CANYON AREA
GULF OF MEXICO**

MAP NO. MC74-SS001



COST RECOVERY PAYMENT

Attachment A-4 (Public Information)



Your payment has been submitted to the designated government agency through Pay.gov and the details are below. Please note that this is just a confirmation of transaction submission. To confirm that the payment processed as expected, you may refer to your bank statement on the scheduled payment date. If you have any questions or wish to cancel this payment, you will need to contact the agency you paid at your earliest convenience.

Application Name: BOEM Development/DOCD Plan - BD
Pay.gov Tracking ID: 26O5TU7T
Agency Tracking ID: 75973501230

Account Holder Name: LLOG Exploration Offshore, L.L.C.
Transaction Type: ACH Debit
Transaction Amount: \$4,238.00
Payment Date: 03/12/2020

Account Type: Business Checking
Routing Number: 065403626
Account Number: *****8323

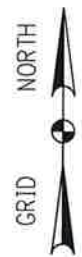
Transaction Date: 03/11/2020 12:00:50 PM EDT
Total Payments Scheduled: 1
Frequency: OneTime

Region: Gulf of Mexico
Contact: Carol Eaton 985-801-4300
Company Name/No: LLOG Exploration Offshore, L.L.C., 02058
Lease Number(s): 34886, , , ,
Area-Block: Mississippi Canyon MC, 74: , , , , , , ,
Type-Wells: Initial Plan, 1

CONCEPTUAL FIELD LAYOUT

Attachment A-5 (Public Information)

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VK 989 "A" POMPANO
(1,284' W.D.)

VK 989 VK 990

VK 991 VK 992

MC 27 MC 28
MC 71 MC 72

MC 29 MC 30
MC 73 MC 74

ILS

UMBILICAL (L= 57,033.70')
PIPELINE (L= 55,865.83')

PRALINE WELLSITE
(2,630' W.D.)

JAN 31 2020
ISSUED FOR PERMIT

NOTES

THIS DRAWING IS THE PROPERTY OF AND EMBODIES CONFIDENTIAL INFORMATION OF PINNACLE ENGINEERING, INC. & LLOG EXPLORATION OFFSHORE L.L.C. THIS DRAWING AND THE INFORMATION THEREON SHALL NOT BE REPRODUCED OR DISCLOSED TO ANY OTHER PARTY OR USED FOR ANY OTHER PURPOSE OTHER THAN FOR THE BENEFIT OF AND AS AUTHORIZED BY PINNACLE ENGINEERING, INC. OR LLOG EXPLORATION OFFSHORE L.L.C.

NO	DATE	DESCRIPTION	BY	APPR
A	1-31-20	ISSUED FOR PERMIT	ROD	MED



TX REGISTERED ENGR FIRM F-567

APPROVAL	
Drawn By	R. DETHLOFF
Date	1-29-20
Checked By	
Date	
Designed By	
Date	
Approved By	
Date	

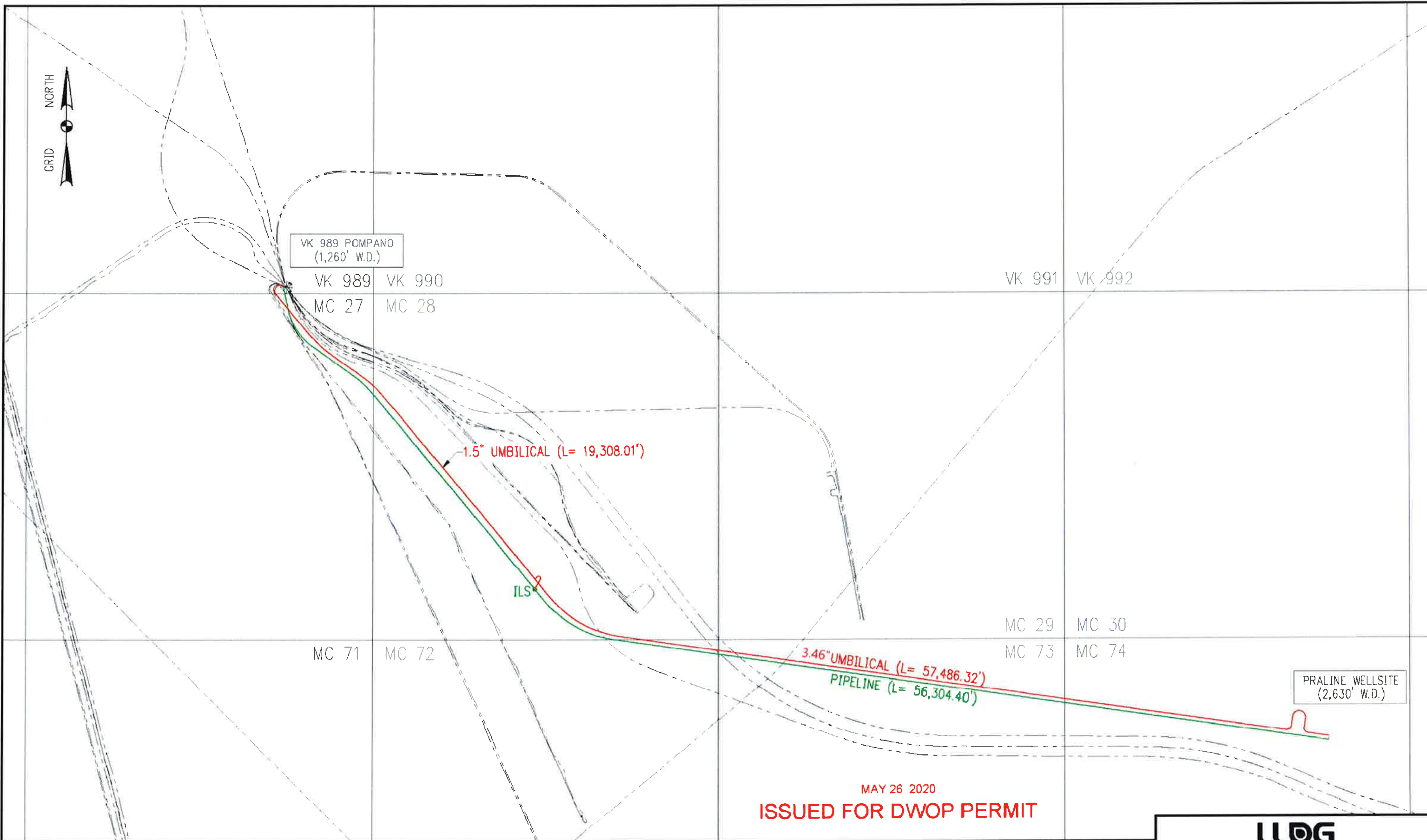


PRALINE SUBSEA DEVELOPMENT
MC 74 PRALINE TO VK 989 "A" POMPANO

CONCEPTUAL FIELD LAYOUT

DWG. NO. 204900-PIP-DG-ROUTE-PERMIT-A

JGUEVARA 5/26/2020 4:11:23 PM P:\STRUCT\204900\PIPELINE\DWOP\204900-PIP-DG-LAY-DWOP-B.dwg



MAY 26 2020
ISSUED FOR DWOP PERMIT

NOTES

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NO.	DATE	DESCRIPTION	BY	APPR.
B	5-26-20	ISSUED FOR DWOP PERMIT	JCG	DDW
A	5-15-20	ISSUED FOR DWOP PERMIT	JCG	MED

PINNACLE ENGINEERING

PINNACLE ENGINEERING
TX REGISTERED ENGR FIRM F-567

APPROVAL	
Drawn By	F. DETHLOF
Date	3-17-17
Checked By	
Date	
Designed By	
Date	
Approved By	
Date	

LLOG
exploration

PRALINE SUBSEA DEVELOPMENT
MC 74 PRALINE TO VK 989 POMPANO

PRELIMINARY LAYOUT FOR CONCEPTUAL PLAN

DWG NO. 204900-PIP-DG-LAY-DWOP-B

**APPENDIX B
GENERAL INFORMATION
(30 CFR PART 550.213 and 550.243)**

A. *Application and Permits*

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

<i>Application/Permit</i>	<i>Issuing Agency</i>	<i>Status</i>
CZM Consistency Certifications	LA/MS	Pending

B. *Drilling Fluids (No additional drilling included with this plan)*

<i>Type of Drilling Fluid</i>	<i>Estimated Volume of Drilling Fluid to be used per well</i>
N/A	N/A

C. *Production*

LLOG estimates the life of reserves for the proposed development activity to be as follows:

PROPRIETARY INFORMATION

D. *Oil Characteristics*

The following table details the chemical and physical characteristics of the oils that will be potentially produced, handled, transported, or stored on/by the facility from which the proposed development and production activities will be conducted:

PROPRIETARY INFORMATION

E. New or Unusual Technology

LLOG does not propose using any new and/or unusual technology for the operations proposed in this plan.

F. Bonding Statement

The bond requirements for the activities and facilities proposed in this DOCD are satisfied by an area wide bond furnished and maintained according to 30 CFR Part 256, subpart I; NTL No. 2000-G16 “Guidelines for General Lease Surety Bonds,” and additional security under 30 CFR 256.43(d) and National NTL No. 2008-N07 “Supplemental Bonding Procedures.”

G. Oil Spill Financial Responsibility (OSFR)

LLOG Exploration Offshore, Inc. (BOEM Company No. 02058) has demonstrated oil spill financial responsibility for the facilities proposed in this Initial DOCD according to 30 CFR Part 253, and NTL 2008-N05, “Guidelines for Oil Spill Financial Responsibility for Covered Facilities.”

H. Deepwater Well Control Statement

LLOG Exploration Offshore L.L.C. (BOEM Company No. 02058) has the financial capability to drill a relief well and conduct other emergency well control operations.

I. Suspensions of Production


LLOG has not filed for an SOP for OCS-G-34886 Lease, Mississippi Canyon Block 74.

J. Blowout Scenario

LLOG drilled the objective sands outlined in the Geological and Geophysical Information Section of this Plan utilizing a typical structural, conductor, surface and production casing program. In the event of a blowout, LLOG anticipates a rate of 18,016 BOPD & 64,348 MCFPD with an anticipated gravity of 41°. The wellbore would most likely bridge over in approximately 2 days. LLOG 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, LLOG does not anticipate any delays in acquiring a DP semi-submersible or Drillship rig to conduct the proposed operations. It could take approximately 30 days to drill the replacement well ***See Attachment – B-1***

Blowout Scenario

Attachment B-1 (Public Information)

	BLOWOUT SCENARIO MC 74	Created by: Last Revised: 5/21/2020 Page 1 of 5 Confidential
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BLOWOUT SCENARIO

Pursuant with 30 CFR 550.213(g), 30 CFR 550.219, 30 CFR 550.250 and NTL 2010-N06 the following attachment provides a blowout scenario description, information regarding any oil spill, WCD results and assumptions of potential spill and additional measures taken to firstly enhance the ability to prevent a blowout and secondly to manage a blowout scenario if it occurred.

INFORMATION REQUIREMENTS

PROPOSED PROSPECT INFORMATION

The Viosca Knoll 989 “A” Platform (Pompano) production facility will serve as a production hub for the MC 74 Well No. 001 and numerous other wells tied back to the hub facility via subsea infrastructure. The below table provides the co-ordinates and distances from the MC 74 well surface location from the proposed hub facility.

Well Surface Location	WD	X (NAD 27)	Y (NAD 27)	Distance (Miles)
VK989 “A” Platform (Pompano)	1290’	1,120,647.00’	10,518,060.00’	55 miles
MC 74 Well 001 OCS-G-34886	2626’	1,168,428.00’	10,497,312.09’	36 miles

INFORMATION REQUIREMENTS

A) Blowout scenario

The MC 74 Well No. 001 has been drilled to potential outlined in the Geological and Geophysical Information Section of this plan utilizing a typical subsea wellhead system, conductor, surface and intermediate casing strings from a pre-existing wellbore and a MODU rig with marine riser and a subsea BOP system. A hydrocarbon influx and a well control event occurring from the objective sand is modeled with no drill pipe or obstructions in the wellbore followed by a failure of the subsea BOP’s and loss of well control at the seabed. The simulated flow and worst case discharge (WCD) results for all wells are calculated and the highest WCD is used for this unrestricted blowout scenario.

B) Estimated flow rate of the potential blowout

Category	Initial DOCD
Type of Activity	Production
Facility Location (area / block)	VK989/MC 74 Well No.SS001
Facility Designation	MODU
Distance to Nearest Shoreline (miles)	36 miles
Uncontrolled Blowout (Volume per day)	18,016 BOPD
Type of Fluid	Crude – API Gravity 41°

C) Total volume and maximum duration of the potential blowout

Duration of Flow (days)	109 days total (see Relief Well Response Estimate below)
Total Volume of Spill (bbls)	1.96 MMBO based on 109 days of uncontrolled flow based on simulator models

D) Assumptions and calculations used in determining the worst case discharge

Assumptions and calculations- Included in Proprietary Copy of Plan N-N-9861 -**Omitted from Public Information Copies**

E) Potential for the well to bridge over

Mechanical failure/collapse of the borehole in a blowout scenario is influenced by several factors including in-situ stress, rock strength and fluid velocities at the sand face. Given the substantial fluid velocities inherent in the WCD, and the scenario as defined where the formation is not supported by a cased and cemented wellbore, it is possible that the borehole may fall/collapse/bridge over within a span of a few days, significantly reducing the outflow of the rates. For this blowout scenario, no bridging is considered.

F) Likelihood for intervention to stop blowout

The likelihood of surface intervention to stop a blowout is based on some of the following equipment specific to potential MODU's to be contracted for this well. It is reasonable to assume that the sooner you are able to respond to the initial blowout, the better likelihood there is to control and contain the event due to reduced pressures at the wellhead, less exposure of well fluids to erode and compromise the well control equipment, and less exposure of hydrocarbons to the surface to safeguard personnel and equipment in an emergency situation. This equipment includes:

- Secondary Acoustic BOP Control System – typically fitted on DP MODU's presently operating in the GOM. This system has the ability to communicate and function specific BOP controls from the surface in the event of a failure of the primary umbilical control system. This system typically can establish BOP controls from the surface acoustic system package on the rig or by deploying a second acoustic package from a separate vessel of opportunity. This system may not be included on all MODU's such as 4th generation moored rigs. This system is typically configured to function the following:
 - Blind;/shear ram close
 - Pipe ram close
 - LMRP disconnect
- ROV Intervention BOP Control System – includes one or more ROV intervention panels mounted on the subsea BOP's located on the seabed allows a ROV utilizing standard ROV stabs to access and function the specific BOP controls. These functions will be tested at the surface as part of the required BOP stump test and selectively at the seafloor to ensure proper functionality. These function include the following (at a minimum):
 - Blind/shear ram close
 - Pipe ram close
 - LMRP disconnect
 - WH disconnect
- Deadman / Autoshear function – typically fitted on DP MODU's and but to be on all MODU's operating in the GOM according to new requirements, this equipment allows for an automated pre-programmed sequence of functions to close the casing shear rams and the blind/shear rams in the event of an inadvertent or emergency disconnect of the LMRP or loss of both hydraulic and electrical supply from the surface control system.

In the event that the intervention systems for the subsea BOP's fail, LLOG will initiate call out of a secondary containment / surface intervention system supported by the Helix Well Containment Group (HWCG) of which LLOG is a member. This system incorporates a capping stack capable of being deployed from the back of a vessel of opportunity equipped with an ROV or from the Helix Q4000 DP MODU. Based on the potential integrity concerns of the well, a "cap and flow" system can be deployed which may include the Helix Producer 1 capable of handling up to 55,000 BOPD flowback.



**BLOWOUT SCENARIO
MC 74**

Created by:
Last Revised: 5/21/2020
Page 3 of 5
Confidential

The vertical intervention work is contingent upon the condition of the blowing out well and what equipment is intact to access the wellbore for kill or containment operations. The available intervention equipment may also require modifications based on actual wellbore conditions. Standard equipment is available through the Helix Deepwater Containment System to fit the wellhead and BOP stack profiles used for the drilling of the above mentioned well.

G) Availability of rig to drill relief well, rig constraints and timing of rigs

LLOG currently has one deepwater MODU under contract (Seadrill West Neptune – Drillship). In the event of a blowout scenario that does not involve loss or damage to the rig such as an inadvertent disconnect of the BOP's, then the existing contracted rig may be available for drilling the relief well and vertical intervention work. If the blowout scenario involves damage to the rig or loss of the BOP's and riser, a replacement rig or rigs will be required.

With the current activity level in the GOM, 30 to 35 deepwater MODU'S are potentially available to support the relief well drilling operations. Rig share and resource sharing agreements are in place between members of the Helix Well Containment Group. The ability to negotiate and contract an appropriate rig or rigs to drill relief wells is highly probable in a short period of time. If the rig or rigs are operating, the time to properly secure the well and move the rig to the relief well site location is estimated to be about 14 to 21 days. Dynamically positioned (DP) MODU's would be the preferred option due to the logistical advantage versus a moored MODU which may add complications due to the mooring spread.

VESSELS OF OPPORTUNITY

Based on the water depth restrictions for the proposed locations the following "Vessels of Opportunity" are presently available for utilization for intervention and containment and relief well operations. These may include service vessels and drilling rigs capable of working in the potential water depths and may include moored vessels and dynamically positioned vessels. The specific conditions of the intervention or relief well operations will dictate the "best fit" vessel to efficiently perform the desired results based on the blowout scenario. The list included below illustrates specific option that may vary according to the actual timing / availability at the time the vessels are needed.

OPERATION	SPECIFIC VESSEL OF OPPORTUNITY
Intervention and Containment	<ul style="list-style-type: none"> • Helix Q4000 (DP Semi) • Helix Producer 1 (DP FPU)
Relief Well Drilling Rigs	<ul style="list-style-type: none"> • Diamond Ocean Victory (Moored Semi) • Ensco 8502 (DP Semi) • Transocean Enterprise (DP Drillship)
ROV / Multi-Purpose Service Vessels	<ul style="list-style-type: none"> • Oceaneering (numerous DP ROV vessels) • HOS Achiever, Iron Horse 1 and 2 (DP MPSV) • Helix Pipe Lay Vessel (equipped w/ 6" PL – 75,000') • Other ROV Vessels – (Chouest, HOS, Fugro, Subsea 7)
Shuttle Tanker / Barge Support	<ul style="list-style-type: none"> • OSG Ship Management

H) Measures taken to enhance ability to prevent blowout

Pursuant to BOEM-2010-034 Final Interim Rules, measures to enhance the ability to prevent or reduce the likelihood of a blowout are largely based on proper planning and communication, identification of potential hazards, training and experience of personnel, use of good oil field practices



**BLOWOUT SCENARIO
MC 74**

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and proper equipment that is properly maintained and inspected for executing drilling operations of the proposed well or wells to be drilled.

When planning and designing the well, ample time is spent analyzing offset data, performing any needed earth modeling and identifying any potential drilling hazards or well specific conditions to safeguard the safety of the crews when well construction operations are underway. Once the design criteria and well design is established, the well design is modeled for the lifecycle of the wellbore to ensure potential failure modes are eliminated. Pursuant to BOEM-2010-0034 Interim Final Rules implemented additional considerations of a minimum of 2 independent barriers for both internal and external flow paths in addition to proper positive and negative testing of the barriers.

The proper training of crew members and awareness to identify and handle well control event is the best way prevent a blowout incident. Contractor's personnel and service personnel training requirements are verified per regulatory requirements per guidelines issued in BOEM-2010-034 Interim Final Rules. Drills are performed frequently to verify crew training and improve reaction times.

Good communication between rig personnel, office support personnel is critical to the success of the operations. Pre-spud meetings are conducted with rig crews and service providers to discuss, inform and as needed improve operations and well plans for safety and efficiency considerations. Daily meetings are conducted to discuss planning and potential hazards to ensure state of preparedness and behavior is enforced to create an informed and safe culture for the operations. Any changes in the planning and initial wellbore design is incorporated and communicated in a Management of Change (MOC) process to ensure continuity for all personnel.

Use of established good oil field practices that safeguard crews and equipment are integrated to incorporate LLOG's, the contractor and service provider policies.

Additional personnel and equipment will be used as needed to elevate awareness and provide real time monitoring of well conditions while drilling such as MWD/LWD/PWD tools used in the bottom hole assemblies. The tool configuration for each open hole section varies to optimize information gathered including the use of Formation-Pressure-While-Drilling (FPWD) tools to establish real time formation pressures and to be used to calibrates pore pressure models while drilling. Log information and pressure data is used by the drilling engineers, geologist and pore pressure engineers to maintain well control and reduced potential events such as well control events and loss circulation events.

Mud loggers continuously monitor return drilling fluids, drill gas levels and cuttings as well as surface mud volumes and flow rates, rate of penetration and lithology/paleo to aid in understanding trends and geology being drilled. Remote monitoring of real time drilling parameters and evaluation of geologic markers and pore pressure indicators is used to identify potential well condition changes.

Proper equipment maintenance and inspection program for same to before the equipment is required. Programmed equipment inspections and maintenance will be performed to ensure the equipment operability and condition. Operations will cease as needed in order to ensure equipment and well conditions are maintained and controlled for the safety of personnel, rig and subsurface equipment and the environment.

I) Measures to conduct effective and early intervention in the event of a blowout

In conjunction with the LLOG Exploration's "Well Control Emergency Response Plan" and as required by NTL 2010-N06, the following is provided to demonstrate the potential time needed for performing secondary intervention and drilling of a relief well to handle potential worst case discharge for the proposed prospect. Specific plans are integrated into the Helix Well Containment Groups procures to



**BLOWOUT SCENARIO
MC 74**

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be approved and submitted with the Application for Permit to Drill. Equipment availability, backup equipment and adaptability to the potential scenarios will need to be addressed based on the initial site assessment of the seafloor conditions for intervention operations. Relief well equipment such as backup wellhead equipment and tubulars will be available in LLOG's inventory for immediate deployment as needed to address frilling the relief well(s).

OPERATION	TIME ESTIMATE (DAYS)
IMMEDIATE RESPONSE <ul style="list-style-type: none"> • safeguard personnel, render first-aid • make initial notifications • implement short term intervention (if possible) • implement spill control • develop Initial Action Plan 	1
INTERIM REPSONSE <ul style="list-style-type: none"> • establish Onsite Command Center and Emergency Management Team • assess well control issues • mobilize people and equipment (Helix DW Containment System) • implement short term intervention and containment (if possible) • develop Intervention Plan • initiate relief well planning • continue spill control measures 	4
INTERVENTION AND CONTAIMENT OPERATIONS <ul style="list-style-type: none"> • mobilize equipment and initiate intervention and containment operations • perform TA operations and mobilize relief wells rig(s) • finalize relief well plans, mobilize spud equipment, receive approvals • continue spill control measures 	14
RELIEF WELL(S) OPERATIONS <ul style="list-style-type: none"> • continue intervention and containment measures • continue spill control measures • drill relief well (s) 	70
PERFORM HYDRAULIC KILL OPERATIONS / SECURE BLOWNOUT WELL <ul style="list-style-type: none"> • continue intervention and containment measures • continue spill control measures • perform hydraulic kill operations, monitor well, secure well 	20
ESTIMATED TOTAL DAYS OF UNCONTROLLED FLOW	109
SECURE RELIELF WELL(S) / PERFORM P&A / TA OPERATIONS / DEMOBE	30
TOTAL DAYS	139

APPENDIX C
GEOLOGICAL AND GEOPHYSICAL INFORMATION
(30 CFR PART 550.214 and 550.244)

A. *Geological Description*

Not applicable – Well already drilled

B. *Structure Contour Maps*

Included as *Attachment C-1* are current structure maps (depth base and expressed in feet subsea) depicting the entire lease coverage area; drawn on top of the prospective hydrocarbon sands. The maps depict bottom hole location and applicable geological cross section.

C. *Interpreted Seismic Lines*

Not Applicable – Well already drilled

D. *Geological Structure Cross-Sections*

An interpreted geological cross section depicting the proposed well locations and depth of the proposed wells is included as *Attachment C-2*. Such cross section corresponds to each seismic line being submitted.

E. *Shallow Hazards Report*

Shallow Hazards report was conducted by Geoscience Earth & Marine Services ("GEMS") for DGE and was filed with the Initial Exploration Plan (N-9861) by letter dated January 7, 2015.

F. *Shallow Hazards Assessments*

Utilizing the 3D Geohazard data a shallow hazard analysis was prepared for the surface locations, evaluating seafloor and subsurface geologic and manmade features and conditions, and was included with approved Initial Exploration Plan (N-9861). ***No additional drilling is proposed in this plan.***

G. High Resolution Seismic Lines

The proposed operations will be conducted from a previously approved surface location outlined in the Revised Exploration Plan (R-6868/R-6536); therefore annotated high resolution survey lines are not being submitted. ***No additional drilling is proposed in this plan.***

STRUCTURE MAPS

Attachment C-1 (Proprietary Information)

GEOLOGIC STRUCTURE CROSS-SECTION

Attachment C-2 (Proprietary Information)

APPENDIX D
HYDROGEN SULFIDE (H₂S) INFORMATION
(30 CFR PART 550.215 AND 550.245)

A. Concentration

LLOG does not anticipate encountering H₂S while conducting the proposed development operations provided under this plan.

B. Classification

In accordance with Title 30 CFR 250.490 ©, the areas of operations have been classified by the Bureau of Ocean Energy Management as “H₂S” absent.

C. H₂S Contingency Plan

Not applicable to proposed operations.

D. Modeling Report

Not applicable to proposed operations.

APPENDIX E
MINERAL RESOURCE CONSERVATION INFORMATION
(30 CFR PART 550.246)

A. *Technology and Reservoir Engineering Practices and Procedures*

PROPRIETARY INFORMATION

B. **Reservoir Development**

PROPRIETARY INFORMATION

APPENDIX F
BIOLOGICAL, PHYSICAL AND SOCIOECONOMIC
INFORMATION
(30 CFR PART 550.216 AND 550.247)

A. DEEPWATER BENTHIC COMMUNITIES

Features or areas that could support high-density chemosynthetic or other benthic communities are not anticipated within 2,000' of proposed location.

B. TOPOGRAPHIC FEATURES (BANKS)

Activities proposed in this Development Operations Coordination Document do not fall within 305 meters (1000 feet) of a topographic "No Activity Zone;" therefore, no map is required per NTL No. 2009-G39, "Biologically Sensitive Underwater Features and Areas."

C. TOPOGRAPHIC FEATURES STATEMENT (SHUNTING)

All activities proposed under this Development Operations Coordination Document will be conducted outside all Topographic Feature Protective Zones;
NO ADDITIONAL DRILLING OPERATIONS

C. LIVE BOTTOMS (PINNACLE TREND FEATURES)

Mississippi Canyon Block 74 is not located within 61 meters (200 feet) of any pinnacle trend feature; therefore, a separate bathymetric map is not required per NTL No. 2009-G39, "Biologically Sensitive Underwater Features and Areas."
NO ADDITIONAL DRILLING OPERATIONS

D. LIVE BOTTOM (LOW RELIEF)

Mississippi Canyon Block 74 is not located within 30 meters (100 feet) of any live bottom (low relief) feature with vertical relief equal to or greater than 8 feet; therefore, live bottom (low relief) maps are not required per NTL No. 2009-G39, "Biologically Sensitive Underwater Features and Areas."
NO ADDITIONAL DRILLING OPERATIONS

E. POTENTIALLY SENSITIVE BIOLOGICAL FEATURES MAP

Mississippi Canyon Block 74 is not located within 30 meters (100 feet) of potentially sensitive biological features; therefore, biologically sensitive area maps are not required.

F. Threatened and Endangered Species Information

Proposed activities in Mississippi Canyon Block 74 are not located in a critical habitat designated under ESA and marine mammals protected under the MMPA. In the event federally listed species become present on MC 74, LLOG will mitigate impact through compliance with the following NTL's and the Biological Opinion of the Endangered Species Act Section 7. See ***Attachment F-1*** for a list of the NOAA Species known in the Gulf of Mexico. No new drilling activity is proposed in this plan however, in the event future workover or recompletion operations are necessary, moon pool daily observation log shall be maintained on the bridge. The deck supervisor on tour shall go to the bridge and log time, date and results of each moon pool inspection. STOP WORK AUTHORITY shall be used and implemented, in a safe and timely manner, for any work that could affect marine life listed on the Endangered Species Act.

BOEM NTL 2016-G01 - "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting".

BOEM NTL 2016-G02 - "Implementation of Seismic survey Mitigation Measures and Protected Species Observer Program".

BSEE NTL 2015-G03 "Marine Trash and Debris Awareness and Eliminations"

G. Archaeological Resources

Mississippi Canyon Block 074 has been determined to have a high potential for containing archaeological properties. In accordance with NTL No. 2005-G07 "Archaeological Surveys and Reports," and NTL No. 2011-JOINT-G01, "Revisions to the List of OCS Lease Blocks Requiring Archaeological Resource Surveys and Reports," an Archaeological Survey Report was provided with the Initial Exploration Plan N-9861.

H. Air and Water Quality Information

Not applicable. The State of Florida is not an affected State.

I. Socioeconomic Information

Not applicable. The State of Florida is not an affected State.

**NOAA Species Known in GOM
Attachment F-1
(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
humpback whale	<i>Megaptera novaeangliae</i>	Endangered
sei whale	<i>Balaenoptera borealis</i>	Endangered
sperm whale	<i>Physeter macrocephalus</i>	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
smalltooth sawfish	<i>Pristis pectinata</i>	Endangered
Invertebrate Species		
lobed star coral	<i>Orbicella annularis</i>	Threatened
mountainous star coral	<i>Orbicella faveolata</i>	Threatened
boulder star coral	<i>Orbicella franksi</i>	Threatened
elkhorn coral	<i>Acropora palmata</i>	Threatened ³

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.

¹ Florida's breeding population is listed as endangered.

² Northwest Atlantic distinct population segment.

³ Colonies located at Flower Garden Banks National Marine Sanctuary.

Endangered Species List Common to the Gulf of Mexico

Geophysical surveys, including the use of airguns and airgun arrays, may have an impact on marine wildlife. Many marine species are protected under the Endangered Species Act (ESA) and all marine mammals (including manatees) are protected under the Marine Mammal Protection Act (MMPA). The following Gulf of Mexico species are listed under the ESA:

Gulf of Mexico Bryde's Whale (*Balaenoptera edeni*)
Sperm Whale (*Physeter macrocephalus*)
Green Turtle (*Chelonia mydas*) – North Atlantic DPS and South Atlantic DPS
Hawksbill Turtle (*Eretmochelys imbricata*)
Kemp's Ridley Turtle (*Lepidochelys kempii*)
Leatherback Turtle (*Dermochelys coriacea*) - Northwest Atlantic
Loggerhead Turtle (*Caretta caretta*) – Northwest Atlantic Ocean DPS
Gulf Sturgeon (*Acipenser oxyrinchus desotoi*)
Oceanic Whitetip Shark (*Carcharhinus longimanus*)
Giant Manta Ray (*Manta birostris*)
West Indian Manatee (*Trichechus manatus*)*

Note that this list can change as other species are listed/delisted, and this protocol shall be applied to any ESA protected species (and all marine mammals) that occur in the Gulf of Mexico, including rare and extralimital species.

LLOG's proposed operations in this plan will not impact the critical habitats of the marine species listed in the Endangered Species Act.

*Managed by the US Fish and Wildlife Service

APPENDIX G
WASTE AND DISCHARGE INFORMATION
(30 CFR PART 550.217 AND 550.248)

A. Projected Generated Waste – See Table 1

- **Unscheduled Future Workovers ONLY– *No Additional Drilling***

B. Projected Ocean Discharges – See Table 2

- **Unscheduled Future Workovers ONLY – *No Additional Drilling***

C. Modeling Report

Not applicable. Discharges will be performed under EPA NPDES General Permit GMG 290000.

D. NPDES Permits

Not applicable. Discharges will be performed under EPA NPDES General Permit GMG290000.

E. Cooling Water Intakes

The information at 550.217(e) and 550.248(e) regarding cooling water intakes is not required to accompany DOCD's submitted in the BOEM.

TABLE 1. WASTES YOU WILL GENERATE, TREAT AND DOWNHOLE DISPOSE OR

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

MC 74 Well 001			Projected ocean discharges		Downhole Disposal
Projected generated waste			Discharge rate	Discharge Method	Answer yes or no
Type of Waste	Composition	Projected Amount			
Will drilling occur? If yes, fill in the muds and cuttings.					
EXAMPLE: Cuttings wetted with synthetic based fluid	Cuttings generated while using synthetic based drilling fluid.	X bbl/well	X bbl/day/well	discharge overboard	No
Water-based drilling fluid	N/A	N/A	N/A	N/A	N/A
Cuttings wetted with water-based fluid	N/A	N/A	N/A	N/A	N/A
Cuttings wetted with synthetic-based fluid	N/A	N/A	N/A	N/A	N/A
Will humans be there? If yes, expect conventional waste					
EXAMPLE: Sanitary waste water	Sanitary waste from living quarters	X bbl/well	X bbl/hr/well	chlorinate and discharge overboard	No
Domestic waste	Misc waste for living quarters	5,143 bbls/well	3.6 bbls/hr/well	Discharge overboard (no free oil)	No
Sanitary waste	Processed sanitary waste from living quarters	3,429 bbls/well	2.4 bbls/hr/well	Chlorinate and discharge overboard	No
Is there a deck? If yes, there will be Deck Drainage					
Deck Drainage	Accumulated drainage due to rainfall	0 to 47,261 bbls/well	0 to 167 bbls/hr/well	Test for oil and grease and discharge overboard	No
Will you conduct well treatment, completion, or workover?					
Well treatment fluids	NPDES approved treatment fluid used for well operations	100 bbls/well	20 bbls/hr/well	Test for oil and grease and discharge overboard.	No
Well completion fluids	Clear brines used for completion operations	500 bbls/well	100 bbls/hr/well	Test for oil and grease and discharge overboard. This excludes clear brines containing Zinc	No
Workover fluids	Clear brines used for workover operations	500 bbls/well	100 bbls/hr/well	Test for oil and grease and discharge overboard. This excludes clear brines containing Zinc	No
Miscellaneous discharges. If yes, only fill in those associated with your activity.					
Desalination unit discharge	Uncontaminated spent seawater used for potable water generation unit	0 to 100,000 bbls/well	60 bbls/hr/well	Discharge overboard	No
Blowout prevent fluid	Treated freshwater used control of subsea blowout preventers	0 to 100 bbls/well	5 bbls/hr/well	Discharge at seafloor	No
Ballast water	Uncontaminated seawater used for ballast control	0 to 100,000 bbls/well	16,350 bbls/hr/well	Discharge overboard	No
Bilge water	NA	NA	NA	NA	NA
Excess cement at seafloor	Excess cement slurry and mixwater used for cementing operation - NPDES allowed	20 bbls/well	20 bbls/hr/well	Discharge at mudline	No
Fire water	Uncontaminated seawater used for fire control system	0 to 10,000 bbls/well	16,350 bbls/hr/well	Discharge overboard	No
Cooling water	Uncontaminated seawater used for heat exchanger operations used to cool machinery	0 to 400,000 bbls/well	120 bbls/hr/well	Discharge overboard	No
Will you produce hydrocarbons? If yes fill in for produced water.					
Produced water	NA	NA	NA	NA	NA
Will you be covered by an individual or general NPDES permit ?		General NPDES	GMG 290000		
			Comply with the requirements of the NPDES permit.		

NOTE: If you will not have a type of waste, enter NA in the row.

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

Please specify whatever the amount reported is a total or per well

MC 74 Well 001		Projected generated waste	Solid and Liquid Wastes Transportation	Waste Disposal		
Type of Waste	Composition	Transport Method	Name/Location of Facility	Amount	Disposal Method	
				<i>Newport Environmental Services Inc., Ingleside, TX</i>	<i>X bbl/well</i>	<i>Recycled</i>
Oil-based drilling fluid or mud	NA	NA	NA	NA	NA	NA
Synthetic-based drilling fluid or mud	NA	NA	NA	NA	NA	NA
Cuttings wetted with Water-based fluid	NA	NA	NA	NA	NA	NA
Cuttings wetted with Synthetic-based fluid	NA	NA	NA	NA	NA	NA
Cuttings wetted with oil-based fluids	NA	NA	NA	NA	NA	NA
Will you produce hydrocarbons? If yes fill in for produced sand.						
Produced sand	NA	NA	NA	NA	NA	NA
Will you have additional wastes that are not permitted for discharge? If						
<i>EXAMPLE: trash and debris (recyclables)</i>	<i>Plastic, paper, aluminum</i>	<i>barged in a storage bin</i>	<i>ARC, New Iberia, LA</i>	<i>X lb/well</i>	<i>Recycled</i>	
Trash and debris	Plastic, paper, aluminum	Barged in a storage bin	Blanchard Landfill, Golden Meadows, LA	4000 lbs / well	Recycled	
Used oil	Spent oil from machinery	Barged in USCG approved transfer tote tanks.	L&L Services, Fourchon, LA	200 bbls / well	Recycled	
Wash water	Wash water w/ SBM residue and surfactants	Barged in 25 bbls cutting boxes and / or liquid mud tanks for supply vessels	Newpark Transfer Station, Fourchon, LA	2000 bbls / well	Approved disposal well injection or land farm	
Chemical product wastes	Spent treatment and / or damaged chemicals used in operations	Barged in 25 bbls cutting boxes and / or cutting boxes	L&L Services, Fourchon, LA	10 bbls / well	Recycled	
NOTE: If you will not have a type of waste, enter NA in the row.						

APPENDIX H
AIR EMISSIONS INFORMATION
(30 CFR PART 550.218 AND 550.249)

The primary air pollutants associated with OCS development activities are:

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

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

A. Emission Worksheets and Screening Questions

The Projected Air Quality Emissions Report (Form MMS-139) addresses the related support vessels and construction barge information.

B. Emissions Reduction Measures

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

C. Verification of Non-default Emissions Factors

LLOG has elected to use the default emission factors as provided in *Attachment H-1*

D. Non-Exempt Activities

The proposed activities are within the exemption amount.

E. Modeling Report

Not applicable. The State of Florida is not an affected State for the proposed activities in this plan.

Air Quality Emissions Report

Attachment H-1 (Public Information)

Attachment H-1

Air Emissions Information (§§ 550.218 and 550.249)

Screening Questions for DOCD's	Yes	No
Is any calculated Complex Total (CT) Emission amount (tons) associated with your proposed development and production activities more than 90% of the amounts calculated using the following formulas: $CT = 3400D^{2/3}$ for CO, and $CT = 33.3D$ for the other air pollutants (where D = distance to shore in miles)?		X
Do your emission calculations include any emission reduction measures or modified emission factors?		X
Does or will the facility complex associated with your proposed development and production activities process production from eight or more wells?		X
Do you expect to encounter H2S at concentrations greater than 20 parts per million (ppm)?		X
Do you propose to flare or vent natural gas in excess of the criteria set forth under 30 CFR 250.1105(a)(2) and (3)?		X
Do you propose to burn produced hydrocarbon liquids?		X
Are your proposed development and production activities located within 25 miles (40 kilometers) from shore?		X
Are your proposed development and production activities located within 124 miles (200 kilometers) of the Breton Wilderness Area?	X	

**** There will be no drilling vessels involved with the hook up this well.
ROW, Jumper/Umbilical installation all covered in ROW application**

AQR spreadsheets are for unscheduled future workovers/recompletions of Well 001, MC 74.

DOCD AIR QUALITY SCREENING CHECKLIST

OMB Control No. 1010-0151
OMB Approval Expires: 03/31/2018

COMPANY	LLOG Exploration Offshore, L.L.C.
AREA	Mississippi Canyon
BLOCK	74
LEASE	OCS-G-34886
PLATFORM	N/A
WELL	SS001
COMPANY CONTACT	Nelda Runyon
TELEPHONE NO.	985-801-4300
REMARKS	ROW PL install, Umbilicals & Jumper installation **Future unschedule workovers - 2021-2024 w/Drillship

LEASE TERM PIPELINE CONSTRUCTION INFORMATION:		
YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS
2020		
2021		Jumper & Umbilicals
2022		
2023		
2024		
2025		
2026		
2027		
2028		
2029		
2030		

AIR EMISSIONS COMPUTATION FACTORS

Fuel Usage Conversion Factors	Natural Gas Turbines		Natural Gas Engines		Diesel Recip. Engine		REF.	DATE
	SCF/hp-hr	9.524	SCF/hp-hr	7.143	GAL/hp-hr	0.0483	AP42 3.2-1	4/76 & 8/84

Equipment/Emission Factors	units	PM	SOx	NOx	VOC	CO	REF.	DATE
NG Turbines	gms/hp-hr		0.00247	1.3	0.01	0.83	AP42 3.2-1& 3.1-1	10/96
NG 2-cycle lean	gms/hp-hr		0.00185	10.9	0.43	1.5	AP42 3.2-1	10/96
NG 4-cycle lean	gms/hp-hr		0.00185	11.8	0.72	1.6	AP42 3.2-1	10/96
NG 4-cycle rich	gms/hp-hr		0.00185	10	0.14	8.6	AP42 3.2-1	10/96
Diesel Recip. < 600 hp.	gms/hp-hr	1	1.468	14	1.12	3.03	AP42 3.3-1	10/96
Diesel Recip. > 600 hp.	gms/hp-hr	0.32	1.468	11	0.33	2.4	AP42 3.4-1	10/96
Diesel Boiler	lbs/bbl	0.084	2.42	0.84	0.008	0.21	AP42 1.3-12,14	9/98
NG Heaters/Boilers/Burners	lbs/mmscf	7.6	0.593	100	5.5	84	P42 1.4-1, 14-2, & 14	7/98
NG Flares	lbs/mmscf		0.000	71.4	60.3	388.5	AP42 11.5-1	9/91
Liquid Flaring	lbs/bbl	0.42	6.83	2	0.01	0.21	AP42 1.3-1 & 1.3-3	9/98
Tank Vapors	lbs/bbl				0.03		E&P Forum	1/93
Fugitives	lbs/hr/comp.				0.0005		API Study	12/93
Glycol Dehydrator Vent	lbs/mmscf				6.6		La. DEQ	1991
Gas Venting	lbs/scf				0.0034			

Sulphur Content Source	Value	Units
Fuel Gas	3.33	ppm
Diesel Fuel	0.4	% weight
Produced Gas(Flares)	0.0015	ppm
Produced Oil (Liquid Flaring)	1	% weight

AIR EMISSIONS CALCULATIONS - FIRST YEAR

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL		CONTACT	PHONE	REMARKS								
LLOG Exploration Offsh	Mississippi Canyon	74	OCS-G-34886	N/A	SS001		Nelda Runyon	985-801-4300	#REF!								
OPERATIONS	EQUIPMENT	RATING	MAX. FUEL	ACT. FUEL	RUN TIME		MAXIMUM POUNDS PER HOUR					ESTIMATED TONS					
	Diesel Engines	HP	GAL/HR	GAL/D													
	Nat. Gas Engines	HP	SCF/HR	SCF/D													
	Burners	MMBTU/HR	SCF/HR	SCF/D	HR/D	DAYS	PM	SOx	NOx	VOC	CO	PM	SOx	NOx	VOC	CO	
DRILLING	PRIME MOVER>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	
	PRIME MOVER>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	
	PRIME MOVER>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	
	PRIME MOVER>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	
	BURNER diesel	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	AUXILIARY EQUIP<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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
	VESSELS>600hp diesel(tugs)	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	
PIPELINE ROW	PIPELINE LAY BARGE diesel	12000	579.6	13910.40	24	15	8.46	38.80	290.75	8.72	63.44	1.52	6.98	52.33	1.57	11.42	
INSTALLATION	ROV 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	
& Umbilical/Jumper	PIPELINE BURY 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	
Installation	SUPPORT 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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
FACILITY	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	
INSTALLATION	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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
PRODUCTION	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	
	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	
	SUPPORT 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	
	TURBINE nat gas	0	0	0.00	0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	
	RECIP.2 cycle lean nat gas	0	0	0.00	0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	
	RECIP.4 cycle lean nat gas	0	0	0.00	0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	
	RECIP.4 cycle rich nat gas	0	0	0.00	0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	
	BURNER nat gas	0	0.00	0.00	0	0	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													
	TANK-FLARE-	0			0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	
	PROCESS VENT-FUGITIVES-		0		0	0			0.00	0.00				0.00	0.00		
	GLYCOL STILL VENT-		0	0.0	0	0			0.00	0.00				0.00	0.00		
DRILLING	OIL BURN	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
WELL TEST	GAS FLARE		0		0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	
2020 YEAR TOTAL							8.46	38.80	290.75	8.72	63.44	1.52	6.98	52.33	1.57	11.42	
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES											1198.80	1198.80	1198.80	1198.80	37069.26	
	36.0																

AIR EMISSIONS CALCULATIONS - SECOND YEAR

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL		CONTACT		PHONE	REMARKS							
LLOG Exploration Offsho	Mississippi Canyon	74	OCS-G-34886	N/A	SS001		Nelda Runyon		985-801-4300	#REF!							
OPERATIONS	EQUIPMENT	RATING	MAX. FUEL	ACT. FUEL	RUN TIME		MAXIMUM POUNDS PER HOUR					ESTIMATED TONS					
					HR/D	DAYS	PM	SOx	NOx	VOC	CO	PM	SOx	NOx	VOC	CO	
		HP	GAL/HR	GAL/D													
Diesel Engines		HP	GAL/HR	GAL/D													
Nat. Gas Engines		HP	SCF/HR	SCF/D													
Burners		MMBTU/HR	SCF/HR	SCF/D	HR/D	DAYS	PM	SOx	NOx	VOC	CO	PM	SOx	NOx	VOC	CO	
DRILLING	PRIME MOVER>600hp diesel	61800	2984.94	71638.56	24.00	30.00	43.56	199.83	1497.36	44.92	326.70	15.68	71.94	539.05	16.17	117.61	
Drilling/Workover	PRIME MOVER>600hp diesel	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	
	PRIME MOVER>600hp diesel	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	
	PRIME MOVER>600hp diesel	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	
	PRIME MOVER>600hp diesel	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	
	BURNER diesel	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	AUXILIARY EQUIP<600hp diesel	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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(tugs)	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	
PIPELINE INSTALLATION	PIPELINE LAY 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	
UmbilicaSI/Jumper	SUPPORT 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	
	PIPELINE BURY 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	
	SUPPORT VESSEL diesel	8805	425.2815	10206.76	24	20	6.21	28.47	213.34	6.40	46.55	1.49	6.83	51.20	1.54	11.17	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
FACILITY INSTALLATION	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	
	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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
PRODUCTION	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	
	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	
	SUPPORT 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	
	TURBINE nat 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	
	RECIP.2 cycle lean nat 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	
	RECIP.4 cycle lean nat 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	
	RECIP.4 cycle rich nat 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	
	BURNER nat gas	0	0.00	0.00	0	0	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													
	TANK-	0			0	0				0.00						0.00	
	FLARE-		0		0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	
	PROCESS VENT-		0		0	0				0.00					0.00		
	FUGITIVES-			0.0	0	0				0.00					0.00		
	GLYCOL STILL VENT-		0		0	0				0.00					0.00		
DRILLING WELL TEST	OIL BURN	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	GAS FLARE		0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2021 YEAR TOTAL							49.77	228.30	1710.69	51.32	373.24	17.17	78.77	590.25	17.71	128.78	
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES											1198.80	1198.80	1198.80	1198.80	37069.26	
	36.0																

AIR EMISSIONS CALCULATIONS - THIRD YEAR

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL		CONTACT	PHONE	REMARKS							
LLOG Exploration Offsho	Mississippi Canyon	74	OCS-G-34886	N/A	SS001		Nelda Runyon	985-801-4300	#REF!							
OPERATIONS	EQUIPMENT	RATING	MAX. FUEL	ACT. FUEL	RUN TIME		MAXIMUM POUNDS PER HOUR					ESTIMATED TONS				
	Diesel Engines	HP	GAL/HR	GAL/D												
	Nat. Gas Engines	HP	SCF/HR	SCF/D												
	Burners	MMBTU/HR	SCF/HR	SCF/D	HR/D	DAYS	PM	SOx	NOx	VOC	CO	PM	SOx	NOx	VOC	CO
DRILLING	PRIME MOVER>600hp diesel	61800	2984.94	71638.56	24	30	43.56	199.83	1497.36	44.92	326.70	15.68	71.94	539.05	16.17	117.61
	PRIME MOVER>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
	PRIME MOVER>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
	PRIME MOVER>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
	BURNER diesel	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	AUXILIARY EQUIP<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
	VESSELS>600hp diesel(crew)	7200	347.76	8346.24	12	12	5.07	23.28	174.45	5.23	38.06	0.37	1.68	12.56	0.38	2.74
	VESSELS>600hp diesel(supply)	7200	347.76	8346.24	12	26	5.07	23.28	174.45	5.23	38.06	0.79	3.63	27.21	0.82	5.94
	VESSELS>600hp diesel(tugs)	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
PIPELINE INSTALLATION	PIPELINE LAY 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
	SUPPORT 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
	PIPELINE BURY 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
	SUPPORT 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
	VESSELS>600hp diesel(crew)	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
	VESSELS>600hp diesel(supply)	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
FACILITY INSTALLATION	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
	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
	VESSELS>600hp diesel(crew)	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
	VESSELS>600hp diesel(supply)	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
PRODUCTION	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
	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
	SUPPORT 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
	TURBINE nat 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
	RECIP.2 cycle lean nat 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
	RECIP.4 cycle lean nat 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
	RECIP.4 cycle rich nat 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
	BURNER nat gas	0	0.00	0.00	0	0	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												
	TANK-	0			0	0				0.00						0.00
	FLARE-		0		0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
	PROCESS VENT-		0		0	0				0.00					0.00	
	FUGITIVES-			0.0	0	0				0.00					0.00	
	GLYCOL STILL VENT-		0		0	0				0.00					0.00	
DRILLING WELL TEST	OIL BURN	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	GAS FLARE		0		0	0		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2022 YEAR TOTAL							53.71	246.39	1846.26	55.39	402.82	16.84	77.25	578.82	17.36	126.29
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES											1198.80	1198.80	1198.80	1198.80	37069.26
	36.0															

AIR EMISSIONS CALCULATIONS - FOURTH YEAR

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL		CONTACT		PHONE	REMARKS							
LLOG Exploration Offsho	Mississippi Canyon	74	OCS-G-34886	N/A	SS001		Nelda Runyon		985-801-4300	#REF!							
OPERATIONS	EQUIPMENT	RATING	MAX. FUEL	ACT. FUEL	RUN TIME		MAXIMUM POUNDS PER HOUR					ESTIMATED TONS					
	Diesel Engines	HP	GAL/HR	GAL/D													
	Nat. Gas Engines	HP	SCF/HR	SCF/D													
	Burners	MMBTU/HR	SCF/HR	SCF/D	HR/D	DAYS	PM	SOx	NOx	VOC	CO	PM	SOx	NOx	VOC	CO	
DRILLING	PRIME MOVER>600hp diesel	61800	2984.94	71638.56	24	30	43.56	199.83	1497.36	44.92	326.70	15.68	71.94	539.05	16.17	117.61	
	PRIME MOVER>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	
	PRIME MOVER>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	
	PRIME MOVER>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	
	BURNER diesel	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	AUXILIARY EQUIP<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	
	VESSELS>600hp diesel(crew)	7200	347.76	8346.24	12	12	5.07	23.28	174.45	5.23	38.06	0.37	1.68	12.56	0.38	2.74	
	VESSELS>600hp diesel(tugs)	7200	347.76	8346.24	12	26	5.07	23.28	174.45	5.23	38.06	0.79	3.63	27.21	0.82	5.94	
PIPELINE INSTALLATION	PIPELINE LAY 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	
	SUPPORT 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	
	PIPELINE BURY 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	
	SUPPORT 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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
FACILITY INSTALLATION	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	
	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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
PRODUCTION	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	
	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	
	SUPPORT 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	
	TURBINE nat 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	
	RECIP.2 cycle lean nat 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	
	RECIP.4 cycle lean nat 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	
	RECIP.4 cycle rich nat 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	
	BURNER nat gas	0	0.00	0.00	0	0	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													
	TANK-FLARE-	0			0	0				0.00	0.00					0.00	0.00
PROCESS VENT-FUGITIVES-		0		0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	
GLYCOL STILL VENT-			0.0	0	0				0.00	0.00				0.00	0.00	0.00	
DRILLING WELL TEST	OIL BURN	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	GAS FLARE		0		0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2023 YEAR TOTAL							53.71	246.39	1846.26	55.39	402.82	16.84	77.25	578.82	17.36	126.29	
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES											1198.80	1198.80	1198.80	1198.80	37069.26	
	36.0																

AIR EMISSIONS CALCULATIONS - FIFTH YEAR

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL		CONTACT		PHONE	REMARKS							
LLOG Exploration Offsho	Mississippi Canyon	74	OCS-G-34886	N/A	SS001		Nelda Runyon		985-801-4300	#REF!							
OPERATIONS	EQUIPMENT	RATING	MAX. FUEL	ACT. FUEL	RUN TIME		MAXIMUM POUNDS PER HOUR					ESTIMATED TONS					
		HP	GAL/HR	GAL/D													
	Nat. Gas Engines	HP	SCF/HR	SCF/D													
	Burners	MMBTU/HR	SCF/HR	SCF/D	HR/D	DAYS	PM	SOx	NOx	VOC	CO	PM	SOx	NOx	VOC	CO	
DRILLING	PRIME MOVER>600hp diesel	61800	2984.94	71638.56	24	30	43.56	199.83	1497.36	44.92	326.70	15.68	71.94	539.05	16.17	117.61	
Future Workover	PRIME MOVER>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	
	PRIME MOVER>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	
	PRIME MOVER>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	
	BURNER diesel	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	AUXILIARY EQUIP<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	
	VESSELS>600hp diesel(crew)	7200	347.76	8346.24	12	12	5.07	23.28	174.45	5.23	38.06	0.37	1.68	12.56	0.38	2.74	
	VESSELS>600hp diesel(tugs)	7200	347.76	8346.24	12	26	5.07	23.28	174.45	5.23	38.06	0.79	3.63	27.21	0.82	5.94	
PIPELINE INSTALLATION	PIPELINE LAY 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	
	SUPPORT 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	
	PIPELINE BURY 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	
	SUPPORT 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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
FACILITY INSTALLATION	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	
	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	
	VESSELS>600hp diesel(crew)	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	
	VESSELS>600hp diesel(supply)	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	
PRODUCTION	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	
	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	
	SUPPORT 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	
	TURBINE nat 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	
	RECIP.2 cycle lean nat 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	
	RECIP.4 cycle lean nat 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	
	RECIP.4 cycle rich nat 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	
	BURNER nat gas	0	0.00	0.00	0	0	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													
	TANK-	0			0	0			0.00							0.00	
	FLARE-		0		0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	
	PROCESS VENT-		0		0	0			0.00						0.00		
	FUGITIVES-			0.0	0	0			0.00						0.00		
	GLYCOL STILL VENT-		0		0	0			0.00						0.00		
DRILLING WELL TEST	OIL BURN	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	GAS FLARE		0		0	0		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2024 YEAR TOTAL							53.71	246.39	1846.26	55.39	402.82	16.84	77.25	578.82	17.36	126.29	
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES											1198.80	1198.80	1198.80	1198.80	37069.26	
	36.0																

AIR EMISSIONS CALCULATIONS

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL
LLOG Exploratio	Mississippi Canyon	74	OCS-G-34886	N/A	SS001
Year	Emitted Substance				
	PM	SOx	NOx	VOC	CO
2020	1.52	6.98	52.33	1.57	11.42
2021	17.17	78.77	590.25	17.71	128.78
2022	16.84	77.25	578.82	17.36	126.29
2023	16.84	77.25	578.82	17.36	126.29
2024	16.84	77.25	578.82	17.36	126.29
2025	0.00	0.00	0.00	0.00	0.00
2026	0.00	0.00	0.00	0.00	0.00
2027	0.00	0.00	0.00	0.00	0.00
2028	0.00	0.00	0.00	0.00	0.00
2029	0.00	0.00	0.00	0.00	0.00
Allowable	1198.80	1198.80	1198.80	1198.80	37069.26

APPENDIX I
OIL SPILL INFORMATION
(30 CFR PART 550.219 AND 550.250)

A. Oil Spill Response Planning

All the proposed activities in this Initial Development Operations Coordination Document will be covered by the Oil Spill Response Plan filed by LLOG (No. 02058) in accordance with 30 CFR 254, approved OSRP revision September, 2018 and last OSRP revision non-regulatory updated in LLOG Exploration Offshore, L.L.C. (LLOG) has the capability to respond to the appropriate worst-case spill scenario included in its regional OSRP Plan, filed by LLOG (No. 02058) in accordance with 30 CFR 254, approved OSRP revision September, 2018 and last OSRP revision non-regulatory updated in Compliance December, 2019 with no changes to drilling WCD scenarios/volumes.

The uncontrolled blowout per day for this plan does not exceed our WCD outlined in our current OSRP for Mississippi Canyon Block 547 (approved in Plan S-7545)

B. Spill Response Sites

The following locations will be used in the event an oil spill occurs as a result of the proposed activities.

Primary Response Equipment Location	Pre-Planned Staging Location(s)
Houma, LA	Venice, LA

C. OSRO Information

The O'Brien Group (TOG) will provide trained personnel capable of providing supervisory management of the oil spill response in addition to contacting and deploying cleanup personnel and equipment

LLOG utilizes Clean Gulf Associates (CGA) as it's 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.

D. Worst-Case Scenario Information

<i>Category</i>	<i>Regional OSRP</i>	<i>Initial DOCD</i>
Type of Activity	Development	Development MC74 Well SS001
Facility Surface Location	Mississippi Canyon 547	MC 74
Facility Description	Platform A	VK 989 Platform A Talos (Pompano)
Distance to Nearest Shore (Miles)	38 Miles	36 Miles
Volume:		
Storage Tanks (total)	3,902 bbls	0 bbls
Facility Piping (total)	200 bbls	438 bbls
Lease Term Pipeline	1908 bbls	N/A
Uncontrolled Blowout (day)	29,440 bbls	18,016 bbls
Potential 24 Hour Volume (bbls)	35,540 bbls	18,454 bbls
Type of Liquid Hydrocarbon	Crude Oil	Crude Oil
API Gravity	27°	41°

Since LLOG Exploration Offshore, L.L.C. has the capability to respond to the appropriate worst-case spill scenario included in its regional Oil Spill Response Plan filed by LLOG (No. 02058) in accordance with 30 CFR 254, approved OSRP revision September, 2018 and last OSRP revision non-regulatory updated in Compliance December, 2019 with no changes to drilling WCD scenarios/volumes and since the worst-case scenario determined for our Initial DOCD for MC74 does not replace the appropriate worst-case scenario in our regional OSRP, I hereby certify that LLOG Exploration Offshore, L.L.C. 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 Initial Development Operations Coordination Document MC 74.

LLOG Exploration Offshore, L.L.C. does not plan to use any new or unusual technology in the event of a spill.

F. Oil Spill Discussion - Attached

E. Modeling Report

Not applicable. Florida is not an affected state.

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 production operations, estimated to be 18,016 barrels of crude oil with an API gravity of 41°.

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 of Mexico available on the BOEM website. The results are shown in **Figure 1**. The BOEM OSRAM identifies a 21% probability of impact to the shorelines of Plaquemines Parish, Louisiana within 30 days. Plaquemines Parish includes Barataria Bay, the Mississippi River Delta, Breton Sound and the affiliated islands and bays. This region is an extremely sensitive habitat and serves as a migratory, breeding, feeding and nursery habitat for numerous species of wildlife. Beaches in this area vary in grain particle size and can be classified as fine sand, shell or perched shell beaches. Sandy and muddy tidal flats are also abundant.

Response

LLOG Exploration Offshore, L.L.C. 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. The results indicate 42% or approximately 7,567 barrels of crude oil would be evaporated/dispersed within 24 hours, with approximately 10,449 barrels remaining.

Spill Response MC 74, Well SS001	Barrels of Oil
WCD Volume	18,016
<i>Less</i> 42% natural evaporation/dispersion	7,567
Remaining volume	10,449

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.

LLOG Exploration Offshore, L.L.C.’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, 8 sorties (9,600 gallons) from two of the DC-3 aircrafts

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's 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 of 95,000 barrels may be mobilized and centrally located to provide temporary storage and minimize off-loading time. **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 Plaquemines 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 50,131 barrels. Temporary storage associated with skimming equipment equals 968 barrels. If additional storage is needed, various storage barges with a total capacity of 60,000 barrels 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. Master Service Agreements with AMPOL and OMI Environmental will ensure access to 155,350 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. As a secondary resource, the State of Louisiana Initial Oil Spill Response Plan will be consulted as appropriate to provide detailed shoreline protection strategies and describe necessary action to keep the oil spill from entering Louisiana's coastal wetlands. 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. LLOG Exploration Offshore, L.L.C.'s contract Incident Management Team has access to the applicable ACP(s) and GRP(s).

Based on the anticipated worst case discharge scenario, LLOG Exploration Offshore, L.L.C. 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 48 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

LLOG Exploration Offshore, L.L.C. 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
- VOOs 140' – 180' in length
- VOOs with minimum of 18' x 38' or 23' x 50' of optimum deck space
- VOOs in shallow water should have a draft of <10 feet when fully loaded

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 LLOG Exploration Offshore, L.L.C.'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

On Water Recovery Group

When the first skimming vessel arrives on scene, a complete site assessment will be conducted before recovery operations begin. Once it is confirmed that the air monitoring readings for O₂, LEL, H₂S, CO, VOC, and Benzene are all within the permissible limits, oil recovery operations may begin.

As skimming vessels arrive, they will be organized to work in areas that allow for the most efficient vessel operation and free vessel movement in the recovery of oil. Vessel groups will vary in structure as determined by the Operations Section of the Unified Command, but will generally consist, at a minimum, of the following dedicated assets:

- 3 to 5 – Offshore skimming vessels (recovery)
- 1 – Tank barge (temporary storage)
- 1 – Air asset (tactical direction)
- 2 – Support vessels (crew/utility for supply)
- 6 to 10 – Boom vessels (enhanced booming)

Example (Note: Actual organization of TFs will be dependent on several factors including, asset availability, weather, spilled oil migration, currents, etc.)

The 95' FRV Breton Island out of Venice arrives on scene and conducts an initial site assessment. Air monitoring levels are acceptable and no other visual threats have been observed. The area is cleared for safe skimming operations. The Breton Island assumes command and control (CoC) of on-water recovery operations until a dedicated non-skimming vessel arrives to relieve it of those duties.

A second 95' FRV arrives and begins recovery operations alongside the Breton Island. Several more vessels begin to arrive, including a third 95' FRV out of Galveston, the HOSS Barge (High Volume Open Sea Skimming System) out of Harvey, a boom barge (CGA 300) with 25,000' of 42" auto boom out of Leeville, and 9 Fast Response Units (FRUs) from the load-out location at C-Port in Port Fourchon.

As these vessels set up and begin skimming, they are grouped into task forces (TFs) as directed by the Operations Section of the Unified Command located at the command post.

Initial set-up and potential actions:

- A 1,000 meter safety zone has been established around the incident location for vessels involved in Source Control
- The HOSS Barge is positioned facing the incident location just outside of this safety zone or at the point where the freshest oil is reaching the surface
- The HOSS Barge engages its Oil Spill Detection (OSD) system to locate the heaviest oil and maintains that ability for 24-hour operations

- The HOSS Barge deploys 1,320' of 67" Sea Sentry boom on each side, creating a swath width of 800'
- The Breton Island and H.I. Rich skim nearby, utilizing the same OSD systems as the HOSS Barge to locate and recover oil
- Two FRUs join this group and it becomes TF1
- The remaining 7 FRUs are split into a 2 and 3 vessel task force numbered TF2 and TF3
- A 95' FRV is placed in each TF
- The boom barge (CGA 300) is positioned nearby and begins deploying auto boom in sections between two utility vessels (1,000' to 3,000' of boom, depending on conditions) with chain-link gates in the middle to funnel oil to the skimmers
- The initial boom support vessels position in front of TF2 and TF3
- A 100,000+ barrel offshore tank barge is placed with each task force as necessary to facilitate the immediate offload of skimming vessels

The initial task forces (36 hours in) may be structured as follows:

TF 1

- 1 – 95' FRV
- 1 – HOSS Barge with 3 tugs
- 2 – FRUs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 8 – 500' sections of auto boom with gates
- 8 – Boom-towing vessels
- 2 – Support vessels (crew/utility)

TF 2

- 1 – 95' FRV
- 4 – FRUs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 10 – 500' sections of auto boom with gates
- 10 – Boom-towing vessels
- 2 – Support vessels (crew/utility)

TF 3

- 1 – 95' FRV
- 3 – FRUs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 8 – 500' sections of auto boom with gates
- 8 – Boom-towing vessels
- 2 – Support vessels (crew/utility)

Offshore skimming equipment continues to arrive in accordance with the ETA data listed in figure H.3a; this equipment includes 2 AquaGuard skimmers and 11 sets of Koseq Rigid Skimming Arms. These high volume heavy weather capable systems will be divided into functional groups and assigned to specific areas by the Operations Section of the Unified Command.

At this point of the response, the additional TFs may assume the following configurations:

TF 4

- 2 – Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 – AquaGuard Skimmer
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 2 – Support vessels (crew/utility)
- 6 – 500' sections of auto boom with gates
- 6 – Boom-towing vessels

TF 5

- 3 – Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 – AquaGuard Skimmer
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 2 – Support vessels (crew/utility)
- 8 – 500' sections of auto boom with gates
- 8 – Boom-towing vessels

TF 6

- 3 – Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 2 – Support vessels (crew/utility)
- 6 – 500' sections of auto boom with gates
- 6 – Boom-towing vessels

TF 7

- 3 – Sets of Koseq Rigid Skimming Arms w/ associated 200'+ PIDVs
- 1 – 100,000+ barrel tank barge and associated tug(s)
- 1 – Dedicated air asset for tactical direction
- 2 – Support vessels (crew/utility)
- 6 – 500' sections of auto boom with gates
- 6 – Boom-towing vessels

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	Utility Boat
Operating parameters			
Sea State	3-5 ft max	9.8 ft max	3-5 ft max
Skimming speed	≤1 kt	≤3 kts	≤1 kt
Vessel size			
Minimum Length	100 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): LLOG Exploration Offshore, L.L.C. 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): A self-contained, skid based, skimming system that is deployed from the right side of a vessel of opportunity (VOO). An outrigger holds a 75' long section of air inflatable boom in place that directs oil to an apex for recovery via a Foilex 250 weir skimmer. The outrigger creates roughly a 40' swath width dependent on the VOO beam. The lip of the collection bowl on the skimmer is placed as close to the oil and water interface as possible to maximize oil recovery and minimize water retention. The skimmer then pumps all fluids recovered to the storage tank where it is allowed to settle, and with the approval of the Coast Guard, the water is decanted from the bottom of the tank back into the water ahead of the containment boom to be recycled through the system. Once the tank is full of as much pure recovered oil as possible it is offloaded to a storage barge for disposal in accordance with an approved disposal plan. A second 100 barrel storage tank can be added if the appropriate amount of deck space is available to use as secondary storage.

Tactical Overview

Mechanical Recovery – The FRU is designed to provide fast response skimming capability in the offshore and nearshore environment in a stationary or advancing mode. It provides a rated daily recovery capacity of 4,100 barrels. An additional boom reel with 440' of offshore boom can be deployed along with the FRU, and a second support vessel for boom towing, to extend the swath width when attached to the end of the fixed boom. The range and sustainability offshore is dependent on the VOO that the unit is placed on, but generally these can stay offshore for extended periods. The FRU works well independently or assigned with other on-water recovery assets in a task force. In either case, it is most effective when a designated aircraft is assigned to provide tactical direction to ensure the best placement in 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.

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

- 1 – VOO (100' to 165' Utility or Supply Vessel)
- 1 – Boom reel w/support vessel for towing
- 1 – Tank barge (offshore) for temporary storage
- 1 – Utility/Crewboat (supply)
- 1 – Designated spotter aircraft



The VOSS (yellow) is being deployed and connected to an out-rigged arm. This is suitable for collection in both large pockets of oil and for recovery of streaming oil. The oil-to-skimmer encounter rate is limited by the length of the arm. Skimming pace is ≤ 1 knot.



Through the use of an additional VOO, and using extended sea boom, the swath of the VOSS is increased therefore maximizing the oil-to-skimmer encounter rate. Skimming pace is ≤ 1 knot.

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

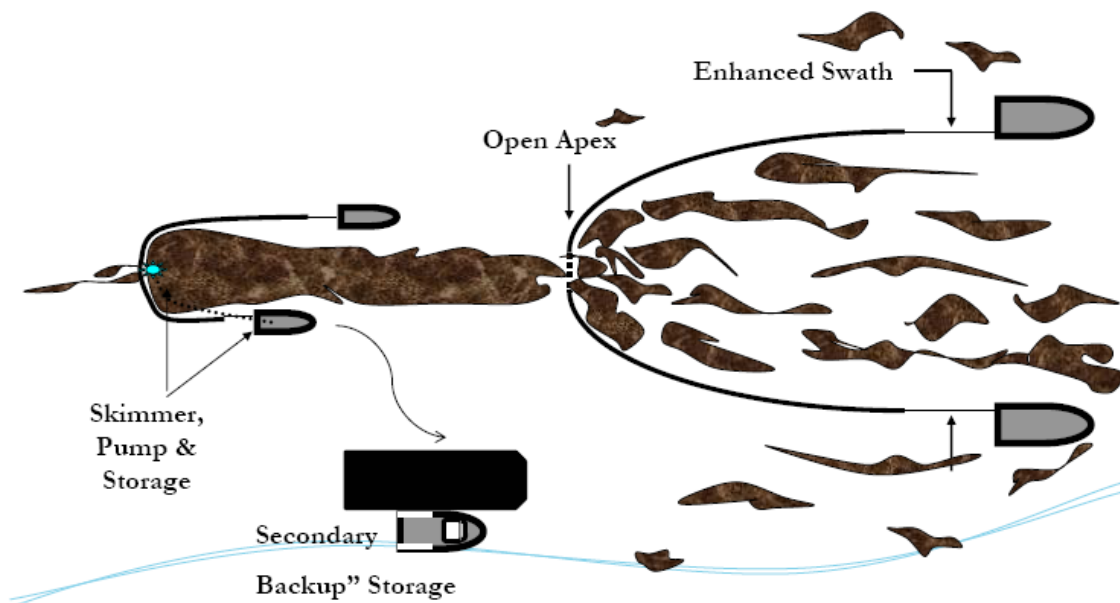
Mechanical Recovery – Deployed on large vessels of opportunity (VOO) the Koseq Rigid Sweeping Arms are high volume surge capacity deployed to increase recovery capacity at the source of a large oil spill in the offshore and outer nearshore environment of the Gulf of Mexico. They are highly mobile and 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 KOSEQ 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
- Egmopol and Marco SWS
- Operate with aerial spotter directing systems to observed oil slicks

VOO

- Use LLOG Exploration Offshore, L.L.C.'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
- Refer to the State of Louisiana Initial Oil Spill Response Plan, Deep Water Horizon, dated 2 May 2010, as a secondary reference
- 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	8 foot seas
HOSS Barge/OSRB	8 foot seas
Koseq Arms	8 foot seas
OSRV	4 foot seas

Environmental Conditions in the GOM

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 of Mexico 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**

Trajectory of a spill and the probability of it impacting a land segment have been projected utilizing LLOG Exploration Offshore, L.L.C.'s WCD and information in the BOEM Oil Spill Risk Analysis Model (OSRAM) for the Central and Western Gulf of Mexico available on the BOEM website using 30 day impact. The results are tabulated below.

Area/Block	OCS-G	Launch Area	Land Segment and/or Resource	Conditional Probability (%) within 30 days
<p align="center">MC 74, Well SS001</p> <p><i>36 miles from shore</i></p>	G34886	C057	Cameron, LA	1
			Vermilion, LA	1
			Terrebonne, LA	2
			Lafourche, LA	2
			Plaquemines, LA	21
			St. Bernard, LA	3
			Hancock & Harrison, MS	1
			Jackson, MS	1
			Mobile, AL	1
			Baldwin, AL	1
			Escambia, AL	1
			Okaloosa, FL	1
			Walton, FL	1
Bay, FL	1			

WCD Scenario– BASED ON WELL BLOWOUT DURING PRODUCTION OPERATIONS (36 miles from shore)

10,449 bbls of crude oil (Volume considering natural weathering)

API Gravity 41°

FIGURE 2 – Equipment Response Time to Mississippi Canyon 74, Well SS001

Dispersants/Surveillance

Dispersant/Surveillance	Dispersant Capacity (gal)	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to site	Total Hrs
ASI							
Basler 67T	2000	2	Houma	2	2	0.7	2.7
DC 3	1200	2	Houma	2	2	0.9	2.9
DC 3	1200	2	Houma	2	2	0.9	2.9
Aero Commander	NA	2	Houma	2	2	0.7	2.7

Offshore Response

Offshore Equipment Pre-Determined 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	20	2	40
95' FRV	22885	249	NA	6	Venice	2	0	3	3	1	9
Boom Barge (CGA-300) 42" Auto Boom (25000')	NA	NA	1 Tug 50 Crew	4 (Barge) 2 (Per Crew)	Leeville	8	0	4	16	2	30
Enterprise Marine Services LLC (Available through contract with CGA)											
CTCo 2603	NA	25000	1 Tug	6	Amelia	25	0	6	16	1	48
CTCo 2607	NA	23000	1 Tug	6	Amelia	25	0	6	16	1	48
CTCo 5001	NA	47000	1 Tug	6	Amelia	25	0	6	16	1	48

Staging Area: Venice

Offshore Equipment With Staging	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Site	Hrs to Deploy	Total Hrs
CGA											
Hydro-Fire Boom	NA	NA	8 Utility	40	Harvey	0	24	2	5	6	37

Nearshore Response

Nearshore Equipment Pre-determined 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											
46' FRV	15257	65	NA	4	Morgan City	2	0	2	5	1	10
46' FRV	15257	65	NA	4	Venice	2	0	2	2	1	7
Enterprise Marine Services LLC (Available through contract with CGA)											
CTCo 2604	NA	20000	1 Tug	6	Amelia	25	0	6	16	1	48
CTCo 2605	NA	20000	1 Tug	6	Amelia	25	0	6	16	1	48
CTCo 2606	NA	20000	1 Tug	6	Amelia	25	0	6	16	1	48

Staging Area: Venice

Nearshore Equipment 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 Egmopol	1810	100	NA	3	Galveston	2	2	13	2	1	20
SWS Egmopol	1810	100	NA	3	Morgan City	2	2	4.5	2	1	11.5
SWS Marco	3588	20	NA	3	Lake Charles	2	2	8	2	1	15
SWS Marco	3588	34	NA	3	Leeville	2	2	4.5	2	1	11.5
SWS Marco	3588	34	NA	3	Venice	2	2	2	2	1	9
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Lake Charles	4	12	8	2	2	28
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Galveston	4	12	13	2	2	33
Foilex Skim Package (TDS 150)	1131	50	1 Utility	3	Harvey	4	12	2	2	2	22
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Lake Charles	2	2	8	2	1	15
4 Drum Skimmer (Magnum 100)	680	100	1 Crew	3	Harvey	2	2	2	2	1	9
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Lake Charles	2	2	8	2	1	15
2 Drum Skimmer (TDS 118)	240	100	1 Crew	3	Harvey	2	2	2	2	1	9

Shoreline Protection

Staging Area: Venice

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	6	2	12	24
12,850' 18" Boom	7 Crew	14	Chalmette, LA	2	2	2.5	2	6	14.5
900' 18" Boom	1 Crew	2	Morgan City, LA	2	2	4.5	2	2	12.5
3,200' 18" Boom	2 Crew	4	Venice, LA	2	2	0	2	2	8
12,750' 18" Boom	7 Crew	14	Port Arthur, TX	2	2	10	2	6	22
OMI Environmental (available through MSA)									
14,000' 18" Boom	6 Crew	12	Belle Chasse, LA	1	1	2	2	3	9
2,000' 18" Boom	1 Crew	2	Galliano, LA	1	1	4	2	3	11
1,800' 18" Boom	1 Crew	2	Gonzalez, LA	1	1	4	2	3	11
11,800' 18" Boom	5 Crew	10	Harvey, LA	1	1	2	2	3	9
2,000' 18" Boom	2 Crew	4	Houma, LA	1	1	4	2	3	11
2,400' 18" Boom	2 Crew	4	Morgan City, LA	1	1	5	2	3	12
3,800' 18" Boom	2 Crew	4	New Iberia, LA	1	1	6	2	3	13
2,300' 18" Boom	2 Crew	4	Port Allen, LA	1	1	5	2	3	12
1,500' 18" Boom	1 Crew	2	Venice, LA	1	1	0	2	3	7
19,000' 18" Boom	6 Crew	12	Deer Park, TX	1	1	12	2	3	19
11,000' 18" Boom	5 Crew	10	La Marque, TX	1	1	13	2	3	20
20,000' 18" Boom	6 Crew	12	Port Arthur, TX	1	1	10	2	3	17

Wildlife Response	EDRC	Storage Capacity	VOO	Persons Req.	From	Hrs to Procure	Hrs to Loadout	Travel to Staging	Travel to Deployment	Hrs to Deploy	Total Hrs
CGA											
Wildlife Support Trailer	NA	NA	NA	2	Harvey	2	2	2	1	2	9
Bird Scare Guns (24)	NA	NA	NA	2	Harvey	2	2	2	1	2	9
Bird Scare Guns (12)	NA	NA	NA	2	Galveston	2	2	13	1	2	20
Bird Scare Guns (12)	NA	NA	NA	2	Aransas Pass	2	2	18	1	2	25
Bird Scare Guns (48)	NA	NA	NA	2	Lake Charles	2	2	8	1	2	15
Bird Scare Guns (24)	NA	NA	NA	2	Leeville	2	2	4.4	1	2	11.4

Response Asset	Total
Offshore EDRC	99,170
Offshore Recovered Oil Capacity	99,249
Nearshore / Shallow Water EDRC	50,131
Nearshore / Shallow Water Recovered Oil Capacity	60,968

APPENDIX J
ENVIRONMENTAL MONITORING INFORMATION
(30 CFR PART 550.221 AND 550.252)

A. *Monitoring Systems*

LLOG subscribes to StormGeo 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 Mexico.

LLOG also relies on the National Weather Service to support the aforementioned subscribed service. During impending inclement weather conditions, LLOG 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.

Mississippi Canyon 74 is in water depths greater than 400 meters (1,312’); therefore LLOG will follow the guidelines of the applicable NTL 2009-G02 “Ocean Current Monitoring”, by monitoring and gathering ocean current data using Acoustic Doppler Current Profile (ADCP) while the MODU is on location.

B. *Incidental Takes*

There is no reason to believe that any sea turtles will be “taken” as a result of the operations proposed in this Initial Development Operations Plan.

LLOG does not anticipate the incidental taking of any species as a result of the proposed activities based on the implementation of, and adherence to, the BSEE NTL No. 2015-G03 “Marine Trash and Debris Awareness Training and Elimination”, BOEM NTL 2016-G01 “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting” and BOEM NTL 2016-G02 – “Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program”.

“LLOG will operate in accordance with the regulations, agency guidance, and Appendix B of the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash Bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. LLOG will collect and remove flotsam resulting from activities related to proposed operations.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), “Think About It” (previously “All Washed Up: The Beach Litter Problem”). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

Contract vessel operators can avoid marine mammals and reduce potential deaths by maintaining a vigilant watch for marine mammals and maintaining a safe distance of 91 meters or greater from whales and a distance of 45 meters or greater from small cetaceans. When assemblages of cetaceans are observed vessel speeds will be reduced to 10 knots or less. Vessel personnel should use a Gulf of Mexico reference guide to help identify the twenty-one species of whales and dolphins, and the single species of manatee that may be encountered in the Gulf of Mexico OCS. Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion, BOEM NTL 2016-G01 “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting” and requirements of the Protected Species Lease Stipulation, except under extraordinary circumstances when the safety of the vessel or crew is in doubt or the safety of life at sea is in question.

Vessel personnel must report sightings of any injured or dead protected marine mammal species immediately, regardless of whether the injury or death is caused by their vessel, to the NMFS Southeast Marine Mammal Stranding Hotline at (877) WHALE-HELP (877-942-5343). Additional information may be found at the following website: (<https://www.fisheries.noaa.gov/report>). Any injured or dead protected species should also be reported to takereport.nmfs@noaa.gov. In addition, if the injury or death was caused by a collision with the operator’s vessel, an entrapment within the operator’s equipment or vessel (e.g. moon pool), or an entanglement within the operator’s equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

In the event future operations may utilize a moon pool(s) to conduct various subsea activities. LLOG's contractor or company representative will provide a dedicated crew member to monitor and continually survey the moon pool area during the operations for sea turtles. If any sea turtle is detected in the moon pool, LLOG will cease operations and contact NMFS at nmfs.psoreview@noaa.gov and BSEE at protectedspecies@bsee.gov and 985-722-7902 for additional guidance and incidental report information. The procedures found in Appendix J of the NMFS Biological Opinion will be employed to free entrapped or entangled marine life safely.

C. Flower Garden Banks National Marine Sanctuary

The activities proposed in this plan are not within the Protective Zones of the Flower Garden Banks and Stetson Banks.

APPENDIX K
LEASE STIPULATION INFORMATION
(30 CFR PART 550.222 AND 550.253)

A. Lease Stipulations

Minerals Management Service (BOEM) invoked Stipulation No. 8 – Protected Species on Lease OCS-G-34886, Mississippi Canyon Block 74. The Endangered Species Act (16 U.S.C. 1531 et seq.) and the Marine Mammal Protection Act (MMPA) (16 U.S.C. 1361 et seq.) are designed to protect threatened and endangered species and mammals and apply to activities on the OCS. The OCS Lands Act (43 U.S.C. 1331, et seq.) provides that the OCS should be made available for expeditious and orderly development subject to environmental safeguards, in a manner which is consistent with the maintenance of competition and other national needs. Both BOEM and BSEE comply with these laws on the OCS. There is no reason to believe that any sea turtles will be “taken” as a result of the operations proposed under this plan.

B. The lessee and its operators must:

1. Collect and remove flotsam resulting from activities related to exploration, Development, and production of this lease;
2. Post signs in prominent places on all vessels and platforms used as a result of activities related to exploration, development, and production of this lease detailing the reasons (legal and ecological) why release of debris must be eliminated;
3. Observe for marine mammals and sea turtles while on vessels, reduce vessel speed to 10 knots or less when assemblages of cetaceans are observed, and maintain 91 meters or greater from whales and 45 meters or greater from small cetaceans and seas turtles;
4. Employ mitigation measures prescribed by BOEM/BSEE or the National Marine Fisheries Service (NMFS) for all seismic surveys, including the use of an “exclusion zone” based upon the appropriate water depth, ramp-up and shutdown procedures, visual monitoring and reporting;
5. Identify important habitats, including designated critical habitat, used by listed species (e.g., sea turtle nesting beaches, piping plover critical habitat), in oil spill contingency planning and require the strategic placement of spill cleanup equipment to be used only by personnel trained in less-intrusive cleanup techniques on beaches and bay shores; and

6. Immediately report all sightings and locations of injured or dead protected species (e.g., marine mammals and sea turtles) to the appropriate stranding network. If oil and gas industry activity is responsible for the injured or dead animal (e.g., because of a vessel strike), the responsible parties should remain available to assist the stranding network. If the injury or death was caused by a collision with the lessee's vessel, the lessee must notify BSEE within 24 hours of the strike.

BOEM and BSEE issue Notice to Lessees and Operators (NTLs), which more fully describe measure implemented in support of the above-mentioned implementing statutes and regulations, as well as measures identified by the U.S. fish and Wildlife Service and NMFS arising from, among others, conservation recommendations, rulemakings pursuant to the MMPA, or consultation. The lessee and its operators, personnel, and subcontractors, while undertaking activities authorized under this lease, must implement and comply with the specific mitigation measures outlined in BOEM NTL No. 2016-G01 (Vessel Strike Avoidance and Injured/Dead Protected Species Reporting), BOEM NTL No. 2016-G02 (Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program); and BSEE NTL No. 2015-G03 (Marine Trash and Debris Awareness and Elimination). At the lessee's option, The lessee, its operators, personnel, and contractors may comply with the most current measure to protect species in place at the time an activity is undertaken under this lease, including, but not limited to, new or updated version of the NTLs identified in this paragraph. The lessee and its operators, personnel, and subcontractors will be required to comply with the mitigation measures, identified in the above referenced NTLs, and any additional measures in the conditions of approvals for their plans or permits.

C. Breton National Wildlife Refuge

Mississippi Canyon Block 74 is located within the 200 km zone of the Breton National Wildlife Refuge, and LLOG will consider the use of best available control technology as required if the projected air emissions are determined to significantly affect the air quality of an onshore area.

APPENDIX L
ENVIRONMENTAL MITIGATION MEASURES INFORMATION
(30 CFR PART 550.223 AND 550.254)

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

This section does not apply to the operations as proposed herein.

B. Incidental Takes

LLOG does not anticipate the incidental taking of any species as a result of the proposed activities based on the implementation of, and adherence the following:

BOEM NTL 2016-G01 - “Vessel Strike Avoidance and Injured/Dead Protected Species Reporting”.

BOEM NTL 2016-G02 - “Implementation of Seismic survey Mitigation Measures and Protected Species Observer Program”.

BSEE NTL 2015-G03 “Marine Trash and Debris Awareness and Eliminations”

LLOG will mitigate impact through compliance with the following NTL’s and the Biological Opinion of the Endangered Species Act Section 7. See **Attachment F-1** for a list of the NOAA Species known in the Gulf of Mexico. No new drilling activity is proposed in this plan however, in the event future workover or recompletion operations are necessary, moon pool daily observation log shall be maintained on the bridge. The deck supervisor on tour shall go to the bridge and log time, date and results of each moon pool inspection. **STOP WORK AUTHORITY** shall be used and implemented, in a safe and timely manner, for any work that could affect marine life listed on the Endangered Species Act.

APPENDIX M
RELATED FACILITIES AND OPERATIONS INFORMATION
(30FR PART 550.256)

A. *Related OCS Facilities and Operations –*

The subject subsea well will be connected via a proposed single ROW pipeline with an associated umbilicals and jumper to the Viosca Knoll 989 “A” Platform (Pompano) in Viosca Knoll 989. This is an existing manned platform and will process produced hydrocarbons from the incoming subsea well for Mississippi Canyon Block 74 Well SS001.

Other than installing a boarding valve skid, an in-line heater, associated platform piping, well control and chemical injection equipment, re-purposing an existing dedicated separator along with its supporting equipment, there are no immediate plans to further modify the existing facility.

An approximate 69,210’ long pipe-in-pipe ROW pipeline (Flowline: 6.625 O.D., Casing: 10.75” O.D.) ROW pipeline will be installed (via dynamically positioned pipe lay vessel) to transport production from the OCS-G 34886, Lease Mississippi Canyon Block 74 to the OCS-G 06898 Lease, Viosca Knoll Block 989 “A” Platform.

The anticipated combined flow rates and shut in times for the flowline is as follows:

<i>Origination Point</i>	<i>Flow Rates</i>	<i>Shut In Time</i>
Area/Block Well No. MC 74 Well SS001	PROPRIETARY	

B. *Transportation System*

LLOG does not anticipate installation of any new/or modified onshore facilities to accommodate the production from the Mississippi Canyon Block 74 Well No. SS001.

C. *Produced Liquid Hydrocarbon Transportation Vessels*

Not applicable. All production will flow through pipelines. No transportation vessels will be utilized.

APPENDIX N
SUPPORT VESSELS AND AIRCRAFT INFORMATION(30 CFR
PART 550.224 AND 550.257)

A. General

During Installation

<i>Type</i>	<i>Maximum Fuel Tank Storage Capacity</i>	<i>Maximum No. in Area at Any Time</i>	<i>Trip Frequency or Duration</i>
DP Pipeline Vessel (ROW PL)	10,000 bbls	1	32 days
ROV Vessel (Jumper)	8805 bbls	1	3 days

ROW, Jumper/Umbilical installation all covered in ROW application.

“Vessel personnel must report sightings of any injured or dead protected marine mammal species immediately, regardless of whether the injury or death is caused by their vessel, to the NMFS Southeast Marine Mammal Stranding Hotline at (877) WHALE-HELP (877-942-5343). Any injured or dead protected species should also be reported to takereport.nmfs@noaa.gov. In addition, if the injury or death was caused by a collision with the operator’s vessel, an entrapment within the operator’s equipment or vessel (e.g. moon pool), or an entanglement within the operator’s equipment, the operator must further notify BOEM and BSEE within 24 hours of the strike or entrapment/entanglement by email to protectedspecies@boem.gov and protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

B. Diesel Oil Supply Vessels. – N/A No Additional Drilling

C. Drilling Fluids Transportation – N/A No Additional Drilling

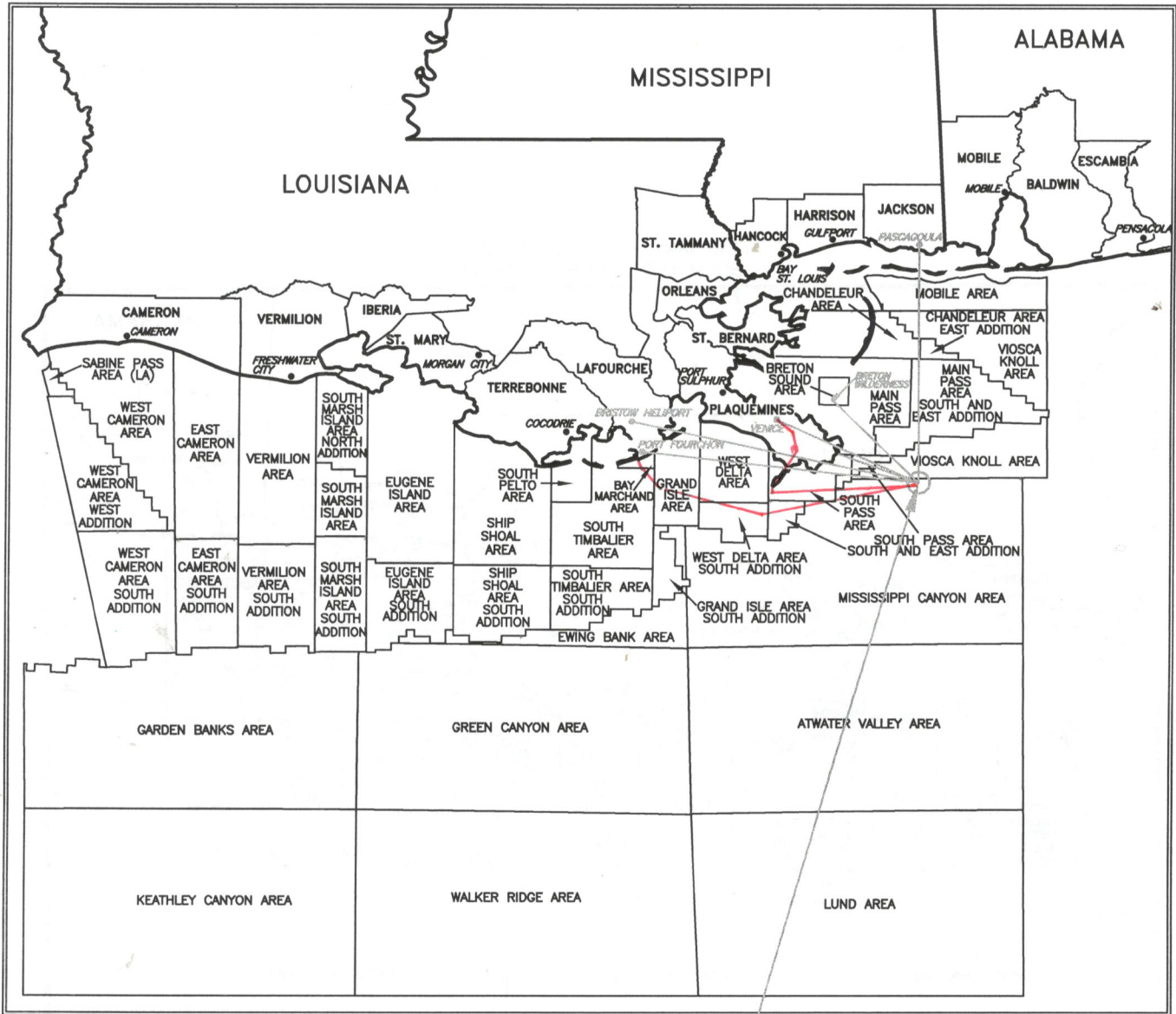
D. Solid and Liquid Wastes Transportation – N/A No Additional Drilling

E. Vicinity Map – A Vicinity Map showing the location MC 74 Well No. 001 relative to the shoreline, onshore base and transportation routes is attached. See Attachment N-1.

VICINITY MAP

Attachment N-1 (Public Information)

LOUISIANA GULF COAST INDEX
BOEM O.C.S. LEASING AREAS



WELL SS001

- ~36 STATUTE (31 NAUTICAL) MILES TO PLAQUEMINES PARISH (NEAREST SHORE)
- COORDINATE TO NEAREST POINT ON SHORELINE X = 1,000,865 Y = 10,589,251
- ~106 STATUTE (92 NAUTICAL) MILES TO PORT FOURCHON, LA
- ~115 STATUTE (100 NAUTICAL) MILES TO BRISTOW HELIPORT, GALLIANO, LA
- ~59 STATUTE (51 NAUTICAL) MILES TO VENICE, LA
- ~99 STATUTE (86 NAUTICAL) MILES TO PASCAGOULA, MS
- ~92 KILOMETERS TO BRETON WILDERNESS

MC-74 to Fourchon = 108 n.m. (approx.)
MC-74 to Venice = 78 n.m. (approx.)

VICINITY MAP

THE DISTANCES SHOWN HEREON ARE FROM THE PROPOSED WELL TO THE NEAREST COASTLINE POINT AS OBTAINED FROM NOAA, ENTITLED NOAA MEDIUM RESOLUTION SHORELINE. <[HTTP://SHORELINE.NOAA.GOV/DATA/DATASHEETS/MEDRES.HTML](http://shoreline.noaa.gov/data/datasheets/medres.html)>

LLOG EXPLORATION OFFSHORE, L.L.C.		EXPLORATION PLAT PROPOSED WELL SS001 OCS-G 34886 BLOCK 74 MISSISSIPPI CANYON AREA	
	NOT TO SCALE	GULF OF MEXICO	
36499 Perkins Road Prairieville, Louisiana 70789 Tel: 225-673-2163	DRAWN BY: RJN CHK. BY.: MEK REV. No.: JOB No.: DWG No.: UTM16		

APPENDIX O
ONSHORE SUPPORT FACILITIES INFORMATION
(30 CFR PART 550.225 AND 550.258)

A. General

The proposed operations in Mississippi Canyon Block 74 will be located approximately 36 statute miles from the nearest shoreline and approximately 108 nautical miles from the onshore support base.

Vicinity Plat - Appendix N – Attachment N-1 shows the location of Mississippi Canyon Block 74 relative to the nearest shoreline. Any rigs, vessels, supply boats, etc. utilized for these proposed activities **will not** transit the Bryde’s whale area

Name	Location	Existing/New/Modified
GIS	Fourchon	Existing
Bristow US LLC – Heliport	Galliano	Existing

B. Support Base Construction or Expansion

Not applicable. All bases are existing and will not be modified due to proposed operations.

C. Support Base Construction or Expansion Timetable.

Not applicable. LLOG will utilize an existing shore base and has no plans to modify due to proposed operations.

D. Waste disposal.

See Tables – Appendix G- Future Workovers - **No Additional Drilling Proposed in this Plan.**

APPENDIX P
COASTAL ZONE MANAGEMENT ACT (CZMA) INFORMATION
(30 CFR PART 550.226 AND 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

A Certificate of Coastal Zone Management Consistency for the States of Louisiana and Mississippi – Attachment P-1

B. Other Information

LLOG Exploration Offshore, L.L.C. has considered all of Louisiana and Mississippi's enforceable polices and certifies the consistency for the proposed operations.

Included as Attachment P-2 are the enforceable polices for Mississippi that are related to this OCS Plan filing.

Coastal Zone Consistency Certifications

Attachment P-1 (Public Information)

**COASTAL ZONE MANAGEMENT
CONSISTENCY CERTIFICATION
INITIAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT
MISSISSIPPI CANYON BLOCK 74
OCS-G 34886**

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

LLOG Exploration Offshore L.L.C.
Lessee or Operator



Carol Eaton
Certifying Official



Date

**COASTAL ZONE MANAGEMENT
CONSISTENCY CERTIFICATION
INITIAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT
MISSISSIPPI CANYON BLOCK 74
OCS-G 34886**

The proposed activities described in detail in this OCS Plan comply with Mississippi's approved Coastal Management Programs and will be conducted in a manner consistent with such Programs

LLOG EXPLORATION OFFSHORE, L.L.C.
Lessee or (Operator



Carol Eaton
Certifying Official

5-19-2020

Date

Coastal Zone Management Enforceable Policies for the State of Mississippi

Attachment P-2 (Public Information)

As authorized by the Federal Zone Management Act (CZMA), the State of Mississippi developed a Coastal Management Program (CMP) to allow for the review of proposed Federal license and permit activities affecting any coastal use or resources in or outside the Mississippi Coastal Zone.

The OCS related oil and gas exploration and development activities having potential impact on the Mississippi Coastal Zone are based on the location of the proposed facilities, access to those sites, best practical techniques for drilling locations, drilling equipment guidelines for the prevention of adverse environmental protection, emergency plans and contingency plans.

The proposed activities addressed in this Plan are located approximately ; ; miles from the nearest Mississippi Coastline.

Below are the goals identified by the State of Mississippi and LLOG's response:

Goal 1: To provide for reasonable industrial expansion in the coastal area and to ensure the efficient utilization of waterfront industrial sites so that suitable sites are conserved for water dependent industry.

The proposed activities are located in OCS Federal Waters, Gulf of Mexico, approximately 36 miles from the nearest Louisiana shoreline. LLOG Exploration Offshore, L.L.C. (LLOG) will utilize existing facilities in Fourchon, Louisiana. Therefore, there should not be any anticipated or planned adverse impacts to Mississippi's coastal area.

Goal 2: To favor the preservation of the coastal wetlands and ecosystems, except where a specific alternation of specific coastal wetlands would serve a higher public interest in compliance with the public purposes of the public trust in which the coastal wetlands are held.

The proposed activities are located in OCS Federal Waters, Gulf of Mexico, approximately 99 miles from the Mississippi coastline and 36 miles from the nearest Louisiana shoreline. LLOG will utilize existing facilities in Fourchon, Louisiana. Therefore there should not be any anticipated or planned adverse impacts to Mississippi's coastal wetlands and ecosystems.

Goal 3: To protect, propagate and conserve the State's seafood and aquatic life in connection with the revitalization, and conserve the State's seafood and aquatic life in connection with the revitalization of the seafloor industry of the State of Mississippi.

The proposed activities are located in OCS Federal Waters, Gulf of Mexico, approximately 99 miles from the Mississippi coastline and 36 miles from the nearest Louisiana shoreline. LLOG will utilize existing facilities in Fourchon, Louisiana. Therefore, there should not be any anticipated or planned adverse impacts to Mississippi's seafood and aquatic life.

Goal 4: To conserve the air and waters of the State, and to protect, maintain and improve the quality thereof for public use, for the proration of wildlife, fish, and aquatic life and for domestic, agricultural, industrial, recreational, and other legitimate beneficial uses.

The activities proposed in this Plan are located in OCS Federal Waters and will use existing facilities located in Louisiana; therefore, there should be no adverse impacts to Mississippi air and water quality.

For the activities scheduled in this Plan, LLOG is proposing to discharge authorized effluents into the receiving waters of the Gulf of Mexico. Overboard discharges (i.e. drilling fluids and associated cuttings) associated with the proposed activities must be tested first for toxicity limitations as mandated by EPA's General Permit GMG290000. Other solid waste such as comminuted food will first pass through a 25 mm type mesh screen, as regulated by the US Coast Guard's Marine Pollution Research and Control Act (MARPOL) of 1987.

Activities proposed in this plan will be conducted in accordance with LLOG's approved Oil Spill Response Plan.

An Air Quality Review has been performed addressing the activities proposed in this Plan and emissions for all parameters are below exemption limitations.

Goal 5: To put to beneficial use to the fullest extent of which they are capable the water resources of the state, and to prevent the waste, unreasonable use, or unreasonable method of use of water.

The activities proposed in this Plan are located in OCS Federal Waters and will use existing facilities located in Louisiana; therefore, there should be no adverse impacts to Mississippi water resources. Activities proposed in this Plan will be conducted in accordance with LLOG's approved Regional Oil Spill Response Plan.

Goal 6: To preserve the state’s historical and archaeological resources, to prevent their destruction, and to enhance these resources wherever possible.

The activities proposed in this Plan are located in OCS Federal Waters and will use existing facilities located in Louisiana; therefore, there should be no adverse impacts to Mississippi historical and archaeological resources.

Goal 7: To encourage preservation of natural scenic qualities in the coastal area.

The activities proposed in this Plan are located in OCS Federal Waters and will use existing facilities located in Louisiana; therefore there should be no adverse impacts to Mississippi coastal area natural scenic qualities.

Goal 8: To assist local governments in the provision of public facilities services in a manner consistent with the coastal program.

The activities proposed in this Plan are located in OCS Federal Waters and will use existing facilities located in Louisiana; therefore, there should be no affect on Mississippi local governments.

APPENDIX Q
ENVIRONMENTAL IMPACT ANALYSIS
(30 CFR PART 550.227 AND 550.261)

LLOG Exploration Offshore, L.L.C.

Initial Development Operations Coordination Document Mississippi Canyon Block 74 OCS-G 34886

(A) IMPACT PRODUCING FACTORS

ENVIRONMENTAL IMPACT ANALYSIS WORKSHEET

Environment Resources	Impact Producing Factors (IPFs) Categories and Examples					
	Refer to recent GOM OCS Lease Sale EIS for a more complete list of IPFs					
	Emissions (air, noise, light, etc.)	Effluents (muds, cutting, other discharges to the water column or seafloor)	Physical disturbances to the seafloor (rig or anchor emplacements, etc.)	Wastes sent to shore for treatment or disposal	Accidents (e.g., oil spills, chemical spills, H ₂ S releases)	Discarded Trash & Debris
Site-specific at Offshore Location						
Designated topographic features		(1)	(1)		(1)	
Pinnacle Trend area live bottoms		(2)	(2)		(2)	
Eastern Gulf live bottoms		(3)	(3)		(3)	
Benthic communities			(4)			
Water quality			X		X	
Fisheries			X		X	
Marine Mammals	X(8)				X(8)	X
Sea Turtles	X(8)				X(8)	X
Air quality	X(9)					
Shipwreck sites (known or potential)			(7)			
Prehistoric archaeological sites			X(7)		X	
Vicinity of Offshore Location						
Essential fish habitat			X		X(6)	
Marine and pelagic birds	X				X	X
Public health and safety					(5)	
Coastal and Onshore						
Beaches					X(6)	X
Wetlands					X(6)	
Shore birds and coastal nesting birds					X(6)	X
Coastal wildlife refuges					X	
Wilderness areas					X	

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:
 - o 4-mile zone of the Flower Garden Banks, or the 3-mile zone of Stetson Bank;
 - o 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;
 - o Essential Fish Habitat (EFH) criteria of 500 ft. from any no-activity zone; or
 - o Proximity of any submarine bank (500 ft. buffer zone) with relief greater than 2 meters that is not protected by the Topographic Features Stipulation attached to an OCS lease.
- 2) Activities with any bottom disturbance within an OCS lease block protected through the Live Bottom (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 a 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.

(B) ANALYSIS

Site-Specific at Mississippi Canyon Block 74

Proposed operations consist of the installation of a ROW pipeline and umbilical/jumper, and to produce the well back to Talos Pompano Platform in OCS-G-06898 Lease VK 989 "A".

Operations will be conducted with a dynamically positioned pipeline vessel and an ROV vessel.

1. Designated Topographic Features

Potential IPFs on topographic features include physical disturbances to the seafloor and accidents.

Physical disturbances to the seafloor: Mississippi Canyon Block 74 is 66 miles from the closest designated Topographic Features Stipulation Block (Sackett Bank); therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5, Water Quality**). Oil spills cause damage to benthic organisms only if the oil contacts the organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on corals. Because the crests of topographic features in the Northern Gulf of Mexico are found below 10 m, no oil from a surface spill could reach their sessile biota. Oil from a subsurface spill is not applicable due to the distance of these blocks from a topographic area. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

There are no other IPFs (including emissions, effluents and wastes sent to shore for disposal) from the proposed activities, which could impact topographic features.

2. Pinnacle Trend Area Live Bottoms

Potential IPFs on pinnacle trend area live bottoms include physical disturbances to the seafloor and accidents.

Physical disturbances to the seafloor: Mississippi Canyon Block 74 is 21 miles from the closest live bottom (pinnacle trend) area; therefore, no adverse impacts are expected.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5, Water Quality**). Oil spills have the potential to foul benthic communities and cause lethal and sublethal effects on live bottom organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been

documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on marine organisms. Oil from a subsurface spill is not applicable due to the distance of these blocks from a live bottom (pinnacle trend) area. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

There are no other IPFs (including emissions, effluents and wastes sent to shore for disposal) from the proposed activities which could impact a live bottom (pinnacle trend) area.

3. Eastern Gulf Live Bottoms

Potential IPFs on Eastern Gulf live bottoms include physical disturbances to the seafloor and accidents.

Physical disturbances to the seafloor: Mississippi Canyon Block 74 is not located in an area characterized by the existence of live bottoms, and this lease does not contain a Live-Bottom Stipulation requiring a photo documentation survey and survey report.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the proposed activities (refer to statistics in **Item 5, Water Quality**). Oil spills cause damage to live bottom organisms only if the oil contacts the organisms. Oil from a surface spill can be driven into the water column; measurable amounts have been documented down to a 10 m depth. At this depth, the oil is found only at concentrations several orders of magnitude lower than the amount shown to have an effect on marine invertebrates. Oil from a subsurface spill is not applicable due to the distance of these blocks from a live bottom area. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

There are no other IPFs (including emissions, effluents and wastes sent to shore for disposal) from the proposed activities which could impact an Eastern Gulf live bottom area.

4. Benthic Communities

There are no IPFs (including emissions, physical disturbances to the seafloor, wastes sent to shore for disposal, or accidents) from the proposed activities that could cause impacts to benthic communities.

Mississippi Canyon Block 74 is located in water depths of 984 feet (300 meters) or greater. However, a dynamically positioned pipeline barge and ROV vessel are being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed. Because physical disturbances to the seafloor will be minimized, LLOG Exploration Offshore, L.L.C.'s proposed operations in Mississippi Canyon Block 74 would not cause impacts to benthic communities.

5. Water Quality

IPFs that could result in water quality degradation from the proposed operations in Mississippi Canyon Block 74 include disturbances to the seafloor, and accidents.

Physical disturbances to the seafloor: Bottom area disturbances resulting from the emplacement of pipelines would increase water-column turbidity and re-suspension of any accumulated pollutants, such as trace metals and excess nutrients. This would cause short-lived impacts on water quality conditions in the immediate vicinity of the emplacement operations.

Accidents: Oil spills have the potential to alter offshore water quality; however, it is unlikely that an accidental surface or subsurface spill would occur from the proposed activities. Between 1980 and 2000, OCS operations produced 4.7 billion barrels of oil and spilled only 0.001 percent of this oil, or 1 bbl for every 81,000 bbl produced. The spill risk related to a diesel spill from drilling operations is even less. Between 1976 and 1985, (years for which data were collected), there were 80 reported diesel spills greater than one barrel associated with drilling activities. Considering that there were 11,944 wells drilled, this is a 0.7 percent probability of an occurrence. If a spill were to occur, the water quality of marine waters would be temporarily affected by the dissolved components and small oil droplets. Dispersion by currents and microbial degradation would remove the oil from the water column and dilute the constituents to background levels. Historically, changes in offshore water quality from oil spills have only been detected during the life of the spill and up to several months afterwards. Most of the components of oil are insoluble in water and therefore float. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional Oil Spill Response Plan (refer to information submitted in **Appendix I**).

There are no other IPFs (including emissions, physical disturbances to the seafloor, effluents and wastes sent to shore for disposal) from the proposed activities which could cause impacts to water quality.

6. Fisheries

IPFs that could cause impacts to fisheries as a result of the proposed operations in Mississippi Canyon Block 74 include physical disturbances to the seafloor, and accidents.

Physical disturbances to the seafloor: The emplacement of a structure or drilling rig results in minimal loss of bottom trawling area to commercial fishermen. Pipelines cause gear conflicts which result in losses of trawls and shrimp catch, business downtime, and vessel damage. Most financial losses from gear conflicts are covered by the Fishermen's Contingency Fund (FCF). The emplacement and removal of facilities are not expected to cause significant adverse impacts to fisheries.

Accidents: An accidental oil spill has the potential to cause some detrimental effects on fisheries; however, it is unlikely that such an event would occur from the proposed activities

(refer to **Item 5, Water Quality**). The effects of oil on mobile adult finfish or shellfish would likely be sublethal and the extent of damage would be reduced to the capacity of adult fish and shellfish to avoid the spill, to metabolize hydrocarbons, and to excrete both metabolites and parent compounds. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

There are no IPFs from emissions, effluents or wastes sent to shore for disposal from the proposed activities which could cause impacts to fisheries.

7. Marine Mammals

GulfCet II studies revealed that cetaceans of the continental shelf and shelf-edge were almost exclusively bottlenose dolphin and Atlantic spotted dolphin. Squid eaters, including dwarf and pygmy killer whale, Risso's dolphin, rough-toothed dolphin, and Cuvier's beaked whale, occurred most frequently along the upper slope in areas outside of anticyclones. IPFs that could cause impacts to marine mammals as a result of the proposed operations in Mississippi Canyon Block 74 include emissions, discarded trash and debris, and accidents.

Emissions: Noises from drilling activities, support vessels and helicopters may elicit a startle reaction from marine mammals. This reaction may lead to disruption of marine mammals' normal activities. Stress may make them more vulnerable to parasites, disease, environmental contaminants, and/or predation (Majors and Myrick, 1990). There is little conclusive evidence for long-term displacements and population trends for marine mammals relative to noise.

Discarded trash and debris: Both entanglement in, and ingestion of debris have caused the death or serious injury of marine mammals (Laist, 1997; MMC, 1999). The limited amount of marine debris, if any, resulting from the proposed activities is not expected to substantially harm marine mammals. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA).

LLOG Exploration Offshore, L.L.C. will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint

presentation), “Think About It” (previously “All Washed Up: The Beach Litter Problem”). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG Exploration Offshore, L.L.C. management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

Accidents: Collisions between support vessels and cetaceans would be unusual events, however should one occur, death or injury to marine mammals is possible. Contract vessel operators can avoid marine mammals and reduce potential deaths by maintaining a vigilant watch for marine mammals and maintaining a safe distance when they are sighted. Vessel personnel should use a Gulf of Mexico reference guide to help identify the twenty-one species of whales and dolphins, and the single species of manatee that may be encountered in the Gulf of Mexico OCS. Vessel personnel must report sightings of any injured or dead protected marine mammal species immediately, regardless of whether the injury or death is caused by their vessel, to the NMFS Southeast Marine Mammal Stranding Hotline at 1-877-433-8299 (<http://www.nmfs.noaa.gov/pr/health/report.htm#southeast>). Any injured or dead protected species should also be reported to takereport.nmfs@noaa.gov. In addition, if the injury or death was caused by a collision with a contract vessel, the BOEM must be notified within 24 hours of the strike by email to protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

Oil spills have the potential to cause sublethal oil-related injuries and spill-related deaths to marine mammals. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Oil spill response activities may increase vessel traffic in the area, which could add to changes in cetacean behavior and/or distribution, thereby causing additional stress to the animals. The effect of oil dispersants on cetaceans is not known. The acute toxicity of oil dispersant chemicals included in LLOG Exploration Offshore, L.L.C.’s OSRP is considered to be low when compared with the constituents and fractions of crude oils and diesel products. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.’s OSRP (refer to information submitted in accordance with **Appendix I**).

There are no other IPFs (including physical disturbances to the seafloor and effluents) from the proposed activities which could impact marine mammals.

8. Sea Turtles

IPFs that could cause impacts to sea turtles as a result of the proposed operations include emissions, discarded trash and debris, and accidents. GulfCet II studies sighted most loggerhead, Kemp’s ridley and leatherback sea turtles over shelf waters. Historically these species have been sighted up to the shelf’s edge. They appear to be more abundant east of the Mississippi River than they are west of the river (Fritts et al., 1983b; Lohoefer et al., 1990). Deep waters may be used by all species as a transitory habitat.

Emissions: Noise from drilling activities, support vessels, and helicopters may elicit a startle reaction from sea turtles, but this is a temporary disturbance.

Discarded trash and debris: Both entanglement in, and ingestion of, debris have caused the death or serious injury of sea turtles (Balazs, 1985). The limited amount of marine debris, if any, resulting from the proposed activities is not expected to substantially harm sea turtles. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). LLOG Exploration Offshore, L.L.C. will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG Exploration Offshore, L.L.C. management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

Accidents: Collisions between support vessels and sea turtles would be unusual events, however should one occur, death or injury to sea turtles is possible. Contract vessel operators can avoid sea turtles and reduce potential deaths by maintaining a vigilant watch for sea turtles and maintaining a safe distance when they are sighted. Vessel crews should use a reference guide to help identify the five species of sea turtles that may be encountered in the Gulf of Mexico OCS. Vessel crews must report sightings of any injured or dead protected sea turtle species immediately, regardless of whether the injury or death is caused by their vessel, to the State Coordinators for the Sea Turtle Stranding and Salvage Network (STSSN) at http://www.sefsc.noaa.gov/species/turtles/stranding_coordinators.htm (phone numbers vary by state). Any injured or dead protected species should also be reported to takereport.nmfsser@noaa.gov. In addition, if the injury or death was caused by a collision with a contract vessel, the BOEM must be notified within 24 hours of the strike by email to protectedspecies@bsee.gov. If the vessel is the responsible party, it is required to remain available to assist the respective salvage and stranding network as needed.

All sea turtle species and their life stages are vulnerable to the harmful effects of oil through direct contact or by fouling of their food. Exposure to oil can be fatal, particularly to juveniles

and hatchlings. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Oil spill response activities may increase vessel traffic in the area, which could add to the possibility of collisions with sea turtles. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix I**).

There are no other IPFs (including physical disturbances to the seafloor and effluents) from the proposed activities which could impact sea turtles.

9. Air Quality

Mississippi Canyon Block 74 is located 57 miles from the Breton Wilderness Area and 36 miles from shore. Applicable emissions data is included in **Appendix H** of the Plan.

There would be a limited degree of air quality degradation in the immediate vicinity of the proposed activities. Plan Emissions for the proposed activities do not exceed the annual exemption levels as set forth by BOEM. Accidents and blowouts can release hydrocarbons or chemicals, which could cause the emission of air pollutants. However, these releases would not impact onshore air quality because of the prevailing atmospheric conditions, emission height, emission rates, and the distance of Mississippi Canyon Block 74 from the coastline. There are no other IPFs (including effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal) from the proposed activities which would impact air quality.

10. Shipwreck Sites (known or potential)

IPFs that could impact known or unknown shipwreck sites as a result of the proposed operations in Mississippi Canyon Block 74 include accidents and disturbances to the seafloor. Mississippi Canyon Block 74 is not located in or adjacent to an OCS block designated by BOEM as having a high probability for occurrence of shipwrecks. LLOG Exploration Offshore, L.L.C. will report to BOEM the discovery of any evidence of a shipwreck and make every reasonable effort to preserve and protect that cultural resource. There are no other IPFs (including emissions, effluents, wastes sent to shore for treatment or disposal, or accidents) from the proposed activities which could impact shipwreck sites.

Accidents: An accidental oil spill has the potential to cause some detrimental effects to shipwreck sites if the release were to occur subsea. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix I**).

There are no other IPFs (including emissions, effluents, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to shipwreck sites.

11. Prehistoric Archaeological Sites

IPFs that could cause impacts to prehistoric archaeological sites as a result of the proposed operations in Mississippi Canyon Block 74 are disturbances to the seafloor and accidents (oil spills).

Disturbances to the seafloor: Mississippi Canyon Block 74 is located inside the Archaeological Prehistoric high probability lines. LLOG Exploration Offshore, L.L.C. will report to BOEM the discovery of any object of prehistoric archaeological significance and make every reasonable effort to preserve and protect that cultural resource.

Accidents: An accidental oil spill has the potential to cause some detrimental effects to prehistoric archaeological sites if the release were to occur subsea. However, it is unlikely that an accidental oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix I**).

There are no other IPFs (including emissions, effluents, wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to prehistoric archaeological sites.

Vicinity of Offshore Location

1. Essential Fish Habitat (EFH)

IPFs that could cause impacts to EFH as a result of the proposed operations in Mississippi Canyon Block 74 include physical disturbances to the seafloor and accidents. EFH includes all estuarine and marine waters and substrates in the Gulf of Mexico.

Physical disturbances to the seafloor: The Live Bottom Low Relief Stipulation, the Live Bottom (Pinnacle Trend) Stipulation, and the Eastern Gulf Pinnacle Trend Stipulation would prevent most of the potential impacts on live-bottom communities and EFH from bottom disturbing activities (e.g., anchoring, structure emplacement and removal).

Accidents: An accidental oil spill has the potential to cause some detrimental effects on EFH. Oil spills that contact coastal bays and estuaries, as well as OCS waters when pelagic eggs and larvae are present, have the greatest potential to affect fisheries. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

There are no other IPFs (including emissions, effluents or wastes sent to shore for treatment or disposal) from the proposed activities which could impact essential fish habitat.

2. Marine and Pelagic Birds

IPFs that could impact marine birds as a result of the proposed activities include air emissions, accidental oil spills, and discarded trash and debris from vessels and the facilities.

Emissions: Emissions of pollutants into the atmosphere from the proposed activities are far below concentrations which could harm coastal and marine birds.

Accidents: An oil spill would cause localized, low-level petroleum hydrocarbon contamination. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Marine and pelagic birds feeding at the spill location may experience chronic, nonfatal, physiological stress. It is expected that few, if any, coastal and marine birds would actually be affected to that extent. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

Discarded trash and debris: Marine and pelagic birds could become entangled and snared in discarded trash and debris, or ingest small plastic debris, which can cause permanent injuries and death. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). LLOG Exploration Offshore, L.L.C. will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass. Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (previously "All Washed Up: The Beach Litter Problem"). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG Exploration Offshore, L.L.C. management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE. Debris, if any, from these proposed activities will seldom interact with marine and pelagic birds; therefore, the effects will be negligible.

There are no other IPFs (including effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact marine and pelagic birds.

3. Public Health and Safety Due to Accidents.

There are no IPFs (emissions, effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal or accidents, including an accidental H₂S release) from the proposed activities which could cause impacts to public health and safety. In accordance with NTL No.'s 2008-G04, 2009-G27, and 2009-G31, sufficient information is included in **Appendix D** to justify our request that our proposed activities be classified by BSEE as H₂S absent.

Coastal and Onshore

1. Beaches

IPFs from the proposed activities that could cause impacts to beaches include accidents (oil spills) and discarded trash and debris.

Accidents: Oil spills contacting beaches would have impacts on the use of recreational beaches and associated resources. Due to the distance from shore (36 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

Discarded trash and debris: Trash on the beach is recognized as a major threat to the enjoyment and use of beaches. There will only be a limited amount of marine debris, if any, resulting from the proposed activities. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). LLOG Exploration Offshore, L.L.C. will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG Exploration Offshore, L.L.C. management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact beaches.

2. Wetlands

IPFs from the proposed activities that could cause impacts to wetlands include accidents (oil spills) and discarded trash and debris.

Accidents: Oil spills could cause impacts to wetlands, however, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5, Water Quality**). Due to the distance from shore (36 miles) and the response capabilities that would be implemented, no impacts are expected. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

Discarded trash and debris: There will only be a limited amount of marine debris, if any, resulting from the proposed activities. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). LLOG Exploration Offshore, L.L.C. will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on all vessels and facilities having sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG Exploration Offshore, L.L.C. management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities which could impact wetlands.

3. Shore Birds and Coastal Nesting Birds

Accidents: Oil spills could cause impacts to shore birds and coastal nesting birds. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5, Water**

Quality). Given the distance from shore (36 miles) and the response capabilities that would be implemented, no impacts are expected. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

Discarded trash and debris: Coastal and marine birds are highly susceptible to entanglement in floating, submerged, and beached marine debris: specifically plastics. Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V and the Marine Plastic Pollution Research and Control Act, and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). LLOG Exploration Offshore, L.L.C. will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (*previously "All Washed Up: The Beach Litter Problem"*). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG Exploration Offshore, L.L.C. management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to shore birds and coastal nesting birds.

4. Coastal Wildlife Refuges

Accidents: An accidental oil spill from the proposed activities could cause impacts to coastal wildlife refuges. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5**, Water Quality). Due to the distance from shore (36 miles) and the response capabilities that would be implemented, no impacts are expected. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

Discarded trash and debris: Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V, the Marine Plastic Pollution Research and Control Act and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). LLOG Exploration Offshore, L.L.C. will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special

precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), "Think About It" (previously "All Washed Up: The Beach Litter Problem"). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG Exploration Offshore, L.L.C. management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to coastal wildlife refuges.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to coastal wildlife refuges.

5. Wilderness Areas

Accidents: An accidental oil spill from the proposed activities could cause impacts to wilderness areas. However, it is unlikely that an oil spill would occur from the proposed activities (refer to **Item 5, Water Quality**). Due to the distance from the nearest designated Wilderness Area (57 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. The activities proposed in this plan will be covered by LLOG Exploration Offshore, L.L.C.'s Regional OSRP (refer to information submitted in **Appendix I**).

Discarded trash and debris: Operators are prohibited from deliberately discharging debris as mandated by MARPOL-Annex V, the Marine Plastic Pollution Research and Control Act and regulations imposed by various agencies including the United States Coast Guard (USCG) and the Environmental Protection Agency (EPA). LLOG Exploration Offshore, L.L.C. will operate in accordance with the regulations and also avoid accidental loss of solid waste items by maintaining waste management plans, manifesting trash sent to shore, and using special precautions such as covering outside trash bins to prevent accidental loss of solid waste. Special caution will be exercised when handling and disposing of small items and packaging materials, particularly those made of non-biodegradable, environmentally persistent materials such as plastic or glass.

Informational placards will be posted on vessels and every facility that has sleeping or food preparation capabilities. All offshore personnel, including contractors and other support

services-related personnel (e.g. helicopter pilots, vessel captains and boat crews) will be indoctrinated on waste procedures, and will view the video (or Microsoft PowerPoint presentation), “Think About It” (previously “All Washed Up: The Beach Litter Problem”). Thereafter, all personnel will view the marine trash and debris training video annually. Offshore personnel will also receive an explanation from LLOG Exploration Offshore, L.L.C. management or the designated lease operator management that emphasizes their commitment to waste management in accordance with NTL No. 2015-G03-BSEE.

There are no other IPFs (emissions, effluents, physical disturbances to the seafloor, or wastes sent to shore for treatment or disposal) from the proposed activities that could cause impacts to wilderness areas.

6. Other Environmental Resources Identified

There are no other environmental resources identified for this impact assessment.

(C) IMPACTS ON PROPOSED ACTIVITIES

The site-specific environmental conditions have been taken into account for the proposed activities. No impacts are expected on the proposed activities from site-specific environmental conditions.

(D) ENVIRONMENTAL HAZARDS

During the hurricane season, June through November, the Gulf of Mexico is impacted by an average of ten tropical storms (39-73 mph winds), of which six become hurricanes (> 74 mph winds). Due to its location in the gulf, Mississippi Canyon Block 74 may experience hurricane and tropical storm force winds, and related sea currents. These factors can adversely impact the integrity of the operations covered by this plan. A significant storm may present physical hazards to operators and vessels, damage exploration or production equipment, or result in the release of hazardous materials (including hydrocarbons). Additionally, the displacement of equipment may disrupt the local benthic habitat and pose a threat to local species.

The following preventative measures included in this plan may be implemented to mitigate these impacts:

1. Platform / structure Installation
Operator will not conduct platform / structure installation operations during Tropical Storm or Hurricane threat.
2. Pipeline Installation
Operator will not conduct pipeline installation operations during Tropical Storm or Hurricane threat.

(E) ALTERNATIVES

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

(F) MITIGATION MEASURES

No mitigation measures other than those required by regulation will be employed to avoid, diminish, or eliminate potential impacts on environmental resources.

(G) CONSULTATION

No agencies or persons were consulted regarding potential impacts associated with the proposed activities. Therefore, a list of such entities has not been provided.

(H) PREPARER(S)

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Although not cited, the following were utilized in preparing this EIA:

- Hazard Surveys
- BOEM EIS's:
 - GOM Deepwater Operations and Activities. Environmental Assessment. BOEM 2000-001
 - GOM Central and Western Planning Areas Sales 166 and 168 Final Environmental Impact Statement. BOEM 96-0058.

Appendix R
Administrative Information
(30FR Part 550.228 and 550.262)

Exempted Information Description (Public Information Copies Only)

Excluded from the Public Information copies are the following:

- Bottomhole location information
- Total well depths (measured and true vertical depth)
- New and Unusual Technology
- Production Rates and Life of Reserves
- Geological and Geophysical Attachments

BIBLIOGRAPHY

- Initial Exploration Plan (N-9861) for MC 74 filed by DGE
- Revised Exploration Plan (R-6536) submitted by LLOG approved 07/26/2019
- LLOG Exploration Offshore, L.L.C.'s approved Regional Oil Spill Response Plan
- Environmental Impact Analysis – Prepared by JConnor & Associates 2020