

UNITED STATES GOVERNMENT
MEMORANDUM

June 13, 2024

To: Public Information

From: Plan Coordinator, OLP, Plans Section (GM 235D)

Subject: Public Information copy of plan

Control # - S-08155

Type - Supplemental Development Operations Coordinations Document

Lease(s) - OCS-G25806 Block - 785 Keathley Canyon Area
OCS-G25813 Block - 828 Keathley Canyon Area
OCS-G25814 Block - 829 Keathley Canyon Area
OCS-G25815 Block - 830 Keathley Canyon Area
OCS-G25823 Block - 872 Keathley Canyon Area

Operator - LLOG Exploration Offshore, L.L.C.

Description - Addition of a new supplemental well KC828 001 and to
revise the location of well KC 829 005

Rig Type - Not Found

Attached is a copy of the subject plan.

It has been deemed submitted and is under review for approval.

Henry Emembolu
Plan Coordinator

**LLOG Exploration Offshore, L.L.C.
1001 Ochsner Blvd. Suite 100
Covington, Louisiana 70433**

**SUPPLEMENTAL DEVELOPMENT OPERATIONS
COORDINATION DOCUMENT**

PUBLIC INFORMATION

**Keathley Canyon Blocks 785/829/830/828/872
OCS-G 25806, OCS-G 25814, OCS-G-25815, OCS-G-25813
and OCS-G-25823 Leases**

Keathley Canyon Block 872 Unit

PREPARED BY:

**Susan Sachitana
Regulatory Specialist
LLOG Exploration Offshore, L.L.C.
(985) 801-4300 Main
(985) 801-4389 Direct
sue.sachitana@llog.com**

Dated: May 2024

LLOG EXPLORATION OFFSHORE, L.L.C.
SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

TABLE OF CONTENTS
HISTORY OF THE LEASES

APPENDIX A	<i>Plan Contents</i>
APPENDIX B	<i>General Information</i>
APPENDIX C	<i>Geological, Geophysical Information</i>
APPENDIX D	<i>H2S Information</i>
APPENDIX E	<i>Mineral Resource Conservation Information</i>
APPENDIX F	<i>Biological, Physical and Socioeconomic Information</i>
APPENDIX G	<i>Waste and Discharge Information</i>
APPENDIX H	<i>Air Emissions Information</i>
APPENDIX I	<i>Oil Spill Information.</i>
APPENDIX J	<i>Environmental Monitoring Information</i>
APPENDIX K	<i>Lease Stipulation Information</i>
APPENDIX L	<i>Environmental Mitigation Measures Information</i>
APPENDIX M	<i>Related Facilities and Operations Information</i>
APPENDIX N	<i>Support Vessels and Aircraft Information</i>
APPENDIX O	<i>Onshore Support Facilities Information</i>
APPENDIX P	<i>Coastal Zone Management Act (CZMA) Information</i>
APPENDIX Q	<i>Environmental Impact Analysis</i>
APPENDIX R	<i>Administrative Information</i>

History of Leases

OCS-G-25806 Lease, Keathley Canyon Block 785 was awarded to Chevron U.S.A. Inc. Western Gulf of Mexico Lease Sale 187 with an effective date of December 1, 2003.

Chevron U.S.A. Inc. drilled the **OCS-G-25806 Lease, Keathley Canyon Block 785, Well 001** and the well was plugged and abandoned on July 15, 2017.

Chevron U.S.A. Inc. drilled the **OCS-G-25806 Lease, Keathley Canyon Block 785, Well 002** which was sidetracked October 27, 2014 and plugged and abandoned on December 19, 2014.

LLOG Exploration Offshore, L.L.C. was designated Operator of OCS-G-25806 Lease, Keathley Canyon Block 785 effective January 4, 2017.

OCS-G-25814 Lease, Keathley Canyon Block 829 was awarded to Chevron U.S.A. Inc. at Western Gulf of Mexico Lease Sale 187 with an effective date of December 1, 2003.

Chevron U.S.A. Inc. drilled the **OCS-G-25814 Lease, Keathley Canyon Block 829, Well 001 ST01BP00** and the well was plugged and abandoned on October 14, 2014.

LLOG Exploration Offshore, L.L.C. was designated Operator of OCS-G-25814 Lease, Keathley Canyon Block 829 effective January 4, 2017.

LLOG Exploration Offshore, L.L.C. has drilled and completed the **OCS-G-25814 Lease, Keathley Canyon Block 829, Wells SS002 and SS003** under the previously approved Revised Exploration Plan R-6588. LLOG filed an Initial DOCD for **Keathley Canyon Block 829** (N-10002) on October 19, 2017, amended October 24, 2017, and was approved March 23, 2018, to produce **Keathley Canyon Block 829 Wells SS002 and SS003**.

LLOG Exploration Offshore, L.L.C. has drilled and is in the process of completing the **OCS-G-25814 Lease, Keathley Canyon Block 829 Well SS004 ST00BP01** under the previously approved in Supplemental DOCD (S-8075) which was approved on July 8, 2022. It was spud on July 28, 2023 and is in the process of being completed at the time of this report.

LLOG Exploration Offshore, L.L.C. has drilled the **OCS-G-25814 Lease, Keathley Canyon 830, Well SS001ST00BP02**. The well spud December 22, 2021, and was completed and producing August 26, 2022.

OCS-G-25813 Lease, Keathley Canyon Block 828 was awarded to Chevron U.S.A. Inc. at Western Gulf of Mexico Lease Sale 187 with an effective date of December 1, 2023. LLOG Exploration Offshore, L. L. C. was designated operator of the lease on 01/04/2017.

OCS-G-25823 Lease, Keathley Canyon 872 was awarded to Chevron U.S.A. Inc. at the Western Gulf of Mexico Lease Sale 187 with an effective date of December 1, 2023. LLOG Exploration Offshore, L. L. C. was designated operator of the lease on 01/04/2017.

OCS-G-25814 Lease, Keathley Canyon Block 829, OCS-G-25815 Lease, Keathley Canyon 830, OCS-G-25806 Keathley Canyon Block 785, OCS-G-25815 Lease, Keathley Canyon Block 830, and OCS-G-25823 Lease, Keathley Canyon Block 872 are part of the **Keathley Canyon Block 872 Unit (No. 754315001)**. **LLOG Exploration Offshore, L.L.C.** was designated as the Operator of **Keathley Canyon Block 872 Unit (No. 754315001)** effective December 12, 2016. The **Keathley Canyon Block 872 Unit** consist of the following leases:

OCS-G-25806 Lease – Keathley Canyon Block 785
OCS-G-25813 Lease – Keathley Canyon Block 828
OCS-G-25814 Lease – Keathley Canyon Block 829
OCS-G-25815 Lease – Keathley Canyon Block 830 (W/2)
OCS-G-25823 Lease – Keathley Canyon Block 872
OCS-G-32650 Lease – Keathley Canyon Block 871

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

A. Plan information

This Supplemental Development Operations Coordination Document provides for the following operations:

Drill, complete and produce the Keathley Canyon Block 828 001 which will be drilled from a surface location in Lease OCS-G-25823, Keathley Canyon 872 and drilled to a bottom hole in OCS-G-25813, Keathley Canyon 828. Alternate well locations are listed as mirror locations in the event they are needed during the drilling of the original well locations in the event of well failure.

Revise the surface and bottom hole location for the KC 829 005 and KC 829 005 Alt well locations to be in Keathley Canyon Block 829, OCS-G-25814 Lease to drill, complete and produce this well. This location was approved under Supplemental DOCD S-8075 on July 28, 2022.

The subject subsea wells (KC 828 001 & KC 829 005) will be equipped with a subsea tree and will flow via a lease term pipeline with associated umbilical's/jumpers to LLOG's existing Keathley Canyon 785 subsea manifold. From here the subject subsea wells will flow through the existing Right-of-Way (ROW) pipelines with associated umbilical to Anadarko's Lucius Spar platform "A" in OCS-G 21444, Keathley Canyon Block 875. This is a manned platform and will process produced hydrocarbons from the incoming subsea wells at Keathley Canyon Block 828 Well SS001 and Keathley Canyon Block 829 Well SS005. Please note that KC 829 Well SS005 was previously approved in DOCD S-8075.

There are no immediate plans to further modify the existing facility.

An approximate 25,050' long x 8.625 O.D. Lease Term pipeline will be installed (via dynamically positioned pipe lay vessel) from the OCS-G-25823, Keathley Canyon Block 872 to a SSTI at the existing subsea manifold in OCS-G-25806, Keathley Canyon Block 785. Two (2) Flowline Jumpers, Two (2) PLETs and One (1) ILS will be installed to connect the subject wells to the proposed Lease Term pipeline and existing subsea manifold (via well and flowline jumpers).

An approximately 26,450' long x 5.32" Lease Term Infield Umbilical will be installed from an Umbilical Termination Assembly (UTA) located in OCS-G 25806, Keathley Canyon Block 785 to an additional UTA near KC 829 Well SS005 and continue to another UTA located near the MC 828 Well No. SS001.

An approximate 80' long x 6.625" lease term well jumper at Keathley Canyon Block 828 Well SS001.

An approximate 80' long x 6.625" lease term well jumper at Keathley Canyon Block 829 Well SS005.

A Conservation Information Document (CID) that discusses the depletion plans of this well will be filed under separate cover.

The wells included in this plan for completeness are as follows:

Well Name / Location	Approved under DOCD	Lease	API Number
KC 829 SS002 ST01	N-10002	OCS-G-25814	608084006001
KC 829 SS003 BP01	N-10002	OCS-G-25814	608084006101
KC 830 SS001 BP02	S-7949	OCS-G-25815	608084006702
KC 785 003	S-8075	OCS-G-25806	608084007200
KC 829 004 BP01	S-8075	OCS-G-25814	608084007301
KC 785 005	S-8075	OCS-G-25806	TBD
KC 829 005	S-8075	OCS-G-25814	TBD
KC 828 001		OCS-G-25813	TBD

B. Location

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

Attachment A-2 – Well Location Plats

Attachment A-3 – Bathymetry Map

Attachment A-4 – Cost Recovery Payment – Paygov Receipt \$5,017.00

Attachment A-5 - Conceptual Field Development

C. Safety & Pollution Features

Safety of personnel and protection of the environment 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 Vessels

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

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of tanks	Total Capacity (bbls)	Fluid Gravity (API)
Fuel Oil Storage Tank	Drillship	16,564 bbls	1	16,564	No. 2 Diesel - 43
Fuel Oil Storage Tank		16,685.5	1	16,685.5	No. 2 Diesel - 43
Fuel Oil Settling Tanks		836.6	2	1,673.2	No. 2 Diesel - 43
Fuel Oil Day Tanks		836.6	2	1,673.2	No. 2 Diesel - 43

Type of Storage Tank	Type of Facility	Tank Capacity (bbls)	Number of tanks	Total Capacity (bbls)	Fluid Gravity (API)
Fuel Oil (Marine Diesel)	DP Semi-Submersible	164	1	164	30
Fuel Oil Day		367	2	734	30
Emergency Generator		31	1	31	30
Forward Hull Fuel Oil		4634	2	9268	30
Lower Aft Hull Fuel Oil		3462	2	6924	30
Lube Oil Services		117 10.5 4.6	1 1 1	132.1	45
Dirty Lube Oil		38 28	1 1	66	45
Dirty Bilge		190	4	760	10

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 550.

G. Cost Recovery Payment

Included as Attachment A-4 is the Pay.gov receipt ID 27DA14SD in the amount of \$5,017.00 for cost recovery fee associated with the Supplemental Development Operations Coordination Document for the OCS-G-25813 Lease, Keathley Canyon 828 001 Well.

OCS Plan Information Form

Attachment A-1

OCS PLAN INFORMATION FORM

General Information										
Type of OCS Plan:		Exploration Plan (EP)		Development Operations Coordination Document (DOCD)				Supplemental DOCD		
Company Name: LLOG EXPLORATION OFFSHORE L.L.C.				BOEM Operator Number: 02058						
Address:				Contact Person: SUE SACHITANA						
1001 OCHSNER BOULEVARD, SUITE 100				Phone Number: 985-801-4300						
COVINGTON, LA 70433				E-Mail Address: SUE.SACHITANA@LLOG.COM						
If a service fee is required under 30 CFR 550.125(a), provide the				Amount paid		\$5,017.00		Receipt No.		27DA14SD
Project and Worst Case Discharge (WCD) Information										
Lease(s): OCS-G 25806		Area: KC		Block: 785		Project Name (If Applicable): BUCKSKIN				
Objective(s)		<input checked="" type="checkbox"/> Oil	<input type="checkbox"/> Gas	<input type="checkbox"/> Sulphur	<input type="checkbox"/> Salt	Onshore Support Base(s): FOURCHON				
Platform/Well Name: KC785 BMP3		Total Volume of WCD: 30,523,248 stb				API Gravity: 29.5°				
Distance to Closest Land (Miles): 209				Volume from uncontrolled blowout: 242,027 bbls/day						
Have you previously provided information to verify the calculations and assumptions for your WCD?							<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No	
If so, provide the Control Number of the EP or DOCD with which this information was provided							S-7655			
Do you propose to use new or unusual technology to conduct your activities?							<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Do you propose to use a vessel with anchors to install or modify a structure?							<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Do you propose any facility that will serve as a host facility for deepwater subsea development?							<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Description of Proposed Activities and Tentative Schedule (Mark all that apply)										
Proposed Activity				Start Date		End Date		No. of Days		
Exploration drilling										
Development drilling				1/1/2024		12/31/2033		365 DAYS/YEAR		
Well completion				INCLUDED IN DRILLING ABOVE						
Well test flaring (for more than 48 hours)				INCLUDED IN DRILLING ABOVE						
Installation or modification of structure										
Installation of production facilities										
Installation of ROW Pipeline and Umbilicals										
Installation of lease term pipelines (Well Jumpers)										
Hook Up and Commence production				INCLUDED IN DRILLING ABOVE						
Other (Specify and attach description)										
Description of Drilling Rig					Description of Structure					
Jackup		<input checked="" type="checkbox"/>	Drillship		Caisson		Tension leg platform			
Gorilla Jackup		<input type="checkbox"/>	Platform rig		Fixed platform		Compliant tower			
Semisubmersible		<input type="checkbox"/>	Submersible		Spar		Guyed tower			
<input checked="" type="checkbox"/>	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)				

**SUPPLEMENTAL DEVELOPMENT OPERATIONS COORDINATION
DOCUMENT**

**Keathley Canyon Blocks 785 / 829 / 830 / 828 / 872
OCS-G 25806, OCS-G 25814, OCS-G-25815, OCS-G-25813
and OCS-G-25823 Leases**

ACTIVITY SCHEDULE

WELL / EVENT	SPUD	TD	COMPL START	COMPL FINISH	DESCRIPTION
KC 828 001	5/15/2024	8/24/2024			DRILL
			7/15/2025	10/23/2025	COMPLETE
KC 785 003	12/01/2024	2/01/2025			DRILL
			4/1/2025	6/1/2025	COMPLETE
KC 829 005	2/01/2025	4/10/2025			DRILL
			5/20/2025	7/15/2025	COMPLETE
KC 785 005	7/1/2025	9/11/2025			DRILL
			6/1/2026	9/9/2026	COMPLETE

<i>Proposed Activity</i>	<i>Start Date</i>	<i>End Date</i>	<i>No. of Days</i>
Lease Term Pipeline	8/30/2025	9/15/2025	16
Associated Umbilical's	11/7/2025	11/22/2025	15
KC 828 Well SS001	2/2/2026	2/5/2026	3
KC 829 Well SS005	2/5/2026	2/8/2026	3
Topside & Subsea Commissioning	1/30/2026	2/15/2026	16
Hook-up and Commence Production	2/15/2026	2/15/2026	1

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 785 003				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.		608084007200	
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 242,027			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 29.5°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS G 25806			OCS			OCS OCS		
Area Name	KEATHLY CANYON								
Block No.	785								
Blockline Departures (in feet)	N/S Departure: F__ L			N/S Departure: F__ L			N/S Departure: F__ L		
	266.51						N/S Departure: F__ L		
	E/W Departure: F__ L			E/W Departure: F__ L			E/W Departure: F__ L		
	7,245.41						E/W Departure: F__ L		
Lambert X-Y coordinates	X: 1,925,234.59			X:			X:		
	Y: 9,504,226.51			Y:			Y:		
Latitude/ Longitude	Latitude 26° 11' 25.353" N			Latitude			Latitude		
	Longitude 92° 07' 52.241" W			Longitude			Longitude		
Water Depth (Feet): 6,612				MD (Feet):		TVD (Feet):		MD (Feet):	
Anchor Radius (if applicable) in feet:				N/A				TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor		
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 785 003 ALT				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.			
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 242,027			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 29.5°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS G 25806			OCS			OCS OCS		
Area Name	KEATHLY CANYON								
Block No.	785								
Blockline Departures (in feet)	N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L		
	233.00						N/S Departure: F <u> </u> L		
	E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L		
	7,449.00						E/W Departure: F <u> </u> L		
Lambert X-Y coordinates	X: 1,925,031.00			X:			X:		
	Y: 9,504,233.00			Y:			Y:		
Latitude/ Longitude	Latitude 26° 11' 25.431" N			Latitude			Latitude		
	Longitude 92° 07' 54.476" W			Longitude			Longitude		
Water Depth (Feet): 6,612				MD (Feet):		TVD (Feet):		MD (Feet):	
Anchor Radius (if applicable) in feet:				N/A				TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor		
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 785 005				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.			
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 242,027 BOPD			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 29.5°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS OCS-G 25808			OCS			OCS OCS		
Area Name	Keathley Canyon								
Block No.	785								
Blockline Departures (in feet)	N/S Departure: F <u> </u> L 320'			N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L N/S Departure: F <u> </u> L N/S Departure: F <u> </u> L		
	E/W Departure: F <u> </u> L 7,400'			E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L E/W Departure: F <u> </u> L E/W Departure: F <u> </u> L		
Lambert X-Y coordinates	X: 1,925,080.00			X:			X: X: X:		
	Y: 9,504,320.00			Y:			Y: Y: Y:		
Latitude/ Longitude	Latitude 26° 11' 26.289"			Latitude			Latitude Latitude Latitude		
	Longitude 92° 07' 53.931"			Longitude			Longitude Longitude Longitude		
Water Depth (Feet): 6,612				MD (Feet):		TVD (Feet):		MD (Feet): MD (Feet): MD (Feet):	
Anchor Radius (if applicable) in feet:					N/A			TVD (Feet): TVD (Feet): TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor				
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 785 005 ALT				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	If this is an existing well or structure, list the Complex ID or API No.		
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 242,027 BOPD			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 29.5°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS OCS-G 25806			OCS			OCS OCS		
Area Name	Keathley Canyon								
Block No.	785								
Blockline Departures (in feet)	N/S Departure: F <u> </u> L 320'			N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L N/S Departure: F <u> </u> L N/S Departure: F <u> </u> L		
	E/W Departure: F <u> </u> L 7,300'			E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L E/W Departure: F <u> </u> L E/W Departure: F <u> </u> L		
Lambert X-Y coordinates	X: 1,925,180.00			X:			X: X: X:		
	Y: 9,504,320.00			Y:			Y: Y: Y:		
Latitude/ Longitude	Latitude 26° 11' 26.283" N			Latitude			Latitude Latitude Latitude		
	Longitude 92° 07' 52.833" W			Longitude			Longitude Longitude Longitude		
Water Depth (Feet): 6,612				MD (Feet):		TVD (Feet):		MD (Feet): MD (Feet): MD (Feet):	
Anchor Radius (if applicable) in feet:				N/A				TVD (Feet): TVD (Feet): TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor				
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 829 SS002 ST01BP00				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.			608084006001
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 122,081 bbls			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 28.1°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS G 25814			OCS			OCS OCS		
Area Name	KEATHLY CANYON								
Block No.	829								
Blockline Departures (in feet)	N/S Departure: F ___ L			N/S Departure: F ___ L			N/S Departure: F ___ L		
	2,339.09						N/S Departure: F ___ L		
	E/W Departure: F ___ L			E/W Departure: F ___ L			E/W Departure: F ___ L		
	1,978.34						E/W Departure: F ___ L		
Lambert X-Y coordinates	X: 1,930,501.66			X:			X:		
	Y: 9,501,660.91			Y:			Y:		
Latitude/ Longitude	Latitude 26° 10' 59.5822"N			Latitude			Latitude		
	Longitude 92° 06' 54.5972"W			Longitude			Longitude		
Water Depth (Feet): 6,650				MD (Feet):		TVD (Feet):		MD (Feet):	
Anchor Radius (if applicable) in feet:				N/A				TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor		
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 829 SS003 BP01				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.		608084006101	
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 122,081 bbls			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 28.1°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS G 25814			OCS			OCS OCS		
Area Name	KEATHLY CANYON								
Block No.	829								
Blockline Departures (in feet)	N/S Departure: F__N__L			N/S Departure: F__L			N/S Departure: F__L		
	2,445.67						N/S Departure: F__L		
	E/W Departure: F__E__L			E/W Departure: F__L			E/W Departure: F__L		
	1,904.26						E/W Departure: F__L		
Lambert X-Y coordinates	X: 1,930,575.74			X:			X:		
	Y: 9,501,554.33			Y:			Y:		
Latitude/ Longitude	Latitude 26° 10' 58.5213"N			Latitude			Latitude		
	Longitude 92° 06' 53.7918"W			Longitude			Longitude		
Water Depth (Feet): 6654'				MD (Feet):		TVD (Feet):		MD (Feet):	
Anchor Radius (if applicable) in feet:				N/A				TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor		
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 829 004 BP01				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.		608084007301	
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 242,027 BOPD			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 29.5°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS OCS-G 25806			OCS			OCS OCS		
Area Name	Keathley Canyon								
Block No.	785								
Blockline Departures (in feet)	N/S Departure: F__ L			N/S Departure: F__ L			N/S Departure: F__ L		
	252.54'						N/S Departure: F__ L		
	E/W Departure: F__ L			E/W Departure: F__ L			E/W Departure: F__ L		
	7,443.23'						E/W Departure: F__ L		
Lambert X-Y coordinates	X: 1,925,036.77			X:			X:		
	Y: 9,504,252.54			Y:			Y:		
Latitude/ Longitude	Latitude 26° 11' 25.624" N			Latitude			Latitude		
	Longitude 92° 07' 54.411" W			Longitude			Longitude		
Water Depth (Feet): 6,612				MD (Feet):		TVD (Feet):		MD (Feet):	
Anchor Radius (if applicable) in feet:				N/A				TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor		
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				

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

Proposed Well/Structure Location										
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 829 005					Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.				
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?							<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 242,027			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 29.5°			
Surface Location				Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)			
Lease No.	OCS OCS-G 25814			OCS			OCS OCS			
Area Name	Keathley Canyon									
Block No.	829									
Blockline Departures (in feet)	N/S Departure: F _N L			N/S Departure: F L			N/S Departure: F L		F L	
	6043'						N/S Departure: F L		F L	
	E/W Departure: F _W L			E/W Departure: F L			E/W Departure: F L		F L	
	1605'						E/W Departure: F L		F L	
Lambert X-Y coordinates	X: 1,918,245.00			X:			X:		X:	
	Y: 9,497,957.00			Y:			Y:		Y:	
Latitude/ Longitude	Latitude 26° 10' 23.696" N			Latitude			Latitude		Latitude	
	Longitude 92° 09' 09.440" W			Longitude			Longitude		Longitude	
Water Depth (Feet): 6612'				MD (Feet):		TVD (Feet):		MD (Feet):		TVD (Feet):
Anchor Radius (if applicable) in feet:								MD (Feet):		TVD (Feet):
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)										
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor					
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						
			X =	Y =						

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 829 005 ALT				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	If this is an existing well or structure, list the Complex ID or API No.		
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 242,027			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 29.5°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS OCS-G 25814			OCS			OCS OCS		
Area Name	Keathley Canyon								
Block No.	829								
Blockline Departures (in feet)	N/S Departure: F <u> </u> L		N/S Departure: F <u> </u> L		N/S Departure: F <u> </u> L		N/S Departure: F <u> </u> L		
	5993'						N/S Departure: F <u> </u> L		
	E/W Departure: F <u> </u> L		E/W Departure: F <u> </u> L		E/W Departure: F <u> </u> L		E/W Departure: F <u> </u> L		
	1605'						E/W Departure: F <u> </u> L		
Lambert X-Y coordinates	X:		X:		X:		X:		
	1,918,245.00						X:		
	Y:		Y:		Y:		Y:		
	9,498,007.00						Y:		
Latitude/ Longitude	Latitude		Latitude		Latitude		Latitude		
	26° 10' 24.192" N						Latitude		
	Longitude		Longitude		Longitude		Longitude		
	92° 09' 09.437" W						Longitude		
Water Depth (Feet): 6612'			MD (Feet):		TVD (Feet):		MD (Feet):		TVD (Feet):
Anchor Radius (if applicable) in feet:							MD (Feet):		TVD (Feet):
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor				
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 828 001				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>		If this is an existing well or structure, list the Complex ID or API No.	
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 122,081			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid		28.1°
Surface Location				Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS G-25823			OCS			OCS OCS		
Area Name	Keathley Canyon								
Block No.	872								
Blockline Departures (in feet)	N/S Departure: F <u> </u> L 2,160.00'			N/S Departure: F <u> </u> L			N/S Departure: F <u> </u> L N/S Departure: F <u> </u> L N/S Departure: F <u> </u> L		
	E/W Departure: F <u> </u> L 7,885.00'			E/W Departure: F <u> </u> L			E/W Departure: F <u> </u> L E/W Departure: F <u> </u> L E/W Departure: F <u> </u> L		
Lambert X-Y coordinates	X: 1,908,755.00			X:			X: X: X:		
	Y: 9,486,000.00			Y:			Y: Y: Y:		
Latitude/ Longitude	Latitude 26° 08' 25.835" N			Latitude			Latitude Latitude Latitude		
	Longitude 92° 10' 54.458" W			Longitude			Longitude Longitude Longitude		
Water Depth (Feet): 6,835				MD (Feet):		TVD (Feet):		MD (Feet): MD (Feet): MD (Feet):	
Anchor Radius (if applicable) in feet:								TVD (Feet): TVD (Feet): TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor				
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 828 001 ALT (LOC ALT C)				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	If this is an existing well or structure, list the Complex ID or API No.		
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 122,081 BOPD			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid		28.1°
Surface Location				Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS G-25823			OCS			OCS OCS		
Area Name	Keathley Canyon								
Block No.	872								
Blockline Departures (in feet)	N/S Departure: F _N L			N/S Departure: F L			N/S Departure: F L		
	2,285.00'						N/S Departure: F L		
	E/W Departure: F _W L			E/W Departure: F L			E/W Departure: F L		
	7,580.00'						E/W Departure: F L		
Lambert X-Y coordinates	X: 1,908,380.00			X:			X:		
	Y: 9,485,875.00			Y:			Y:		
Latitude/ Longitude	Latitude 26° 08' 24.620" N			Latitude			Latitude		
	Longitude 92° 10' 58.583" W			Longitude			Longitude		
Water Depth (Feet): 6,833				MD (Feet):		TVD (Feet):		MD (Feet):	
Anchor Radius (if applicable) in feet:								TVD (Feet):	
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate		Y Coordinate		Length of Anchor Chain on Seafloor		
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				
			X =		Y =				

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

Proposed Well/Structure Location									
Well or Structure Name/Number (If renaming well or structure, reference previous name): KC 830 SS001 BP02				Previously reviewed under an approved EP or DOCD?		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is this an existing well or structure?		<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	If this is an existing well or structure, list the Complex ID or API No.		608084006702	
Do you plan to use a subsea BOP or a surface BOP on a floating facility to conduct your proposed activities?						<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
WCD info	For wells, volume of uncontrolled blowout (Bbls/day): 122,081 bbls			For structures, volume of all storage and pipelines (Bbls):			API Gravity of fluid 28.1°		
	Surface Location			Bottom-Hole Location (For Wells)			Completion (For multiple completions, enter separate lines)		
Lease No.	OCS G 25814			OCS			OCS OCS		
Area Name	KEATHLY CANYON								
Block No.	829								
Blockline Departures (in feet)	N/S Departure: F__ N__ L			N/S Departure: F__ L			N/S Departure: F__ L		
	2,431.88						N/S Departure: F__ L		
	E/W Departure: F__ E__ L			E/W Departure: F__ L			E/W Departure: F__ L		
	1,826.04						E/W Departure: F__ L		
Lambert X-Y coordinates	X: 1,930,653.96			X:			X:		
	Y: 9,501,568.12			Y:			Y:		
Latitude/ Longitude	Latitude 26° 10' 58.653"N			Latitude			Latitude		
	Longitude 92° 06' 52.932"W			Longitude			Longitude		
Water Depth (Feet): 6,650'				MD (Feet):		TVD (Feet):		MD (Feet): TVD (Feet):	
Anchor Radius (if applicable) in feet:					N/A				
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)									
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor				
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					
			X =	Y =					

Well Location Plats

Attachment A-2 (Public Information)

NOTES:

- 1. DP RIG NOBLE FAYE KOZACK SPUNDED WELL ON AUG. 03, 2023.
- 2. FINAL SURFACE LOCATION REPRESENTS AFT ROTARY POSITION AT TIME OF SPUD IN.
- 3. OBSERVED ITRF COORDINATES (C-NAV, CURRENT REALIZATION AND EPOCH) TRANSFORMED TO NAD83(2011) VIA HTDP PROCESS EQUIVALENT TO "EPSG:7807, ITRF2008 TO NAD83(2011) (1)".
- 4. NAD83(2011) COORDINATES TRANSFORMED TO NAD27 VIA NADCON 2.1, EQUIVALENT TO "EPSG:1241, NAD27 TO NAD83 (1)" WHERE NAD83(2011) AND NAD83(86) ARE CONSIDERED FUNCTIONALLY THE SAME.
- 5. THE NUMBER OF SIGNIFICANT FIGURES OF THE COORDINATE VALUES AND DISTANCES SHOWN HEREON IS FOR THE SAKE OF MAINTAINING COMPUTATIONAL PRECISION/INTER CONVERTIBILITY AND SHOULD NOT BE CONSTRUED AS AN EXPRESSION OF ABSOLUTE SPATIAL ACCURACY.

KC741

Y=9,519,840.00'



NAD27
ZONE 15 NORTH
UTM GRID NORTH

X=1,932,480.00'

KEATHLEY CANYON AREA

OCS-G-25806
Well No. 002 ∅

KC785
OCS-G-25806
LLOG

OCS-G-25806 WELL No. 003 FINAL SURFACE LOCATION	
X=	1,925,234.59'
Y=	9,504,226.51'
Lat=	26°11'25.353"N
Lon=	92°07'52.241"W
NAD83	
Lat=	26°11'26.445"N
Lon=	92°07'52.430"W

KC784

KC786

X=1,916,640.00'

Y=9,504,000.00'

KC829

OCS-G-25806
Well No. 001 ∅

226.51'

OCS-G-25806
Well No. 003 ST00BP00

OCS-G-25814
Well No. 004

7,245.41'

PUBLIC INFORMATION

I, ROBERT M. FROST HEREBY CERTIFY THAT THE ABOVE
FINAL SURFACE LOCATION IS CORRECT.

NOT CERTIFIED UNLESS
SIGNED AND SEALED

Robert M. Frost
ROBERT M. FROST
License No. 4573

ROBERT M. FROST
PROFESSIONAL LAND SURVEYOR
LOUISIANA REGISTRATION No. 4573

Digitally signed by: Robert M. Frost, PLS
Date: 2023.08.08 11:08:40 -05'00'



OCS-G-25806 Well No. 003 ST00BP00
BLOCK 785 - KEATHLEY CANYON AREA



U.S. SURVEY FEET (1"=2,000')

PREPARED BY:



OCEANEERING INTERNATIONAL, INC.
202 STANTON STREET
BROUSSARD, LA 70518
(337) 210-0000
LA Reg. No. 747

JOB: 227321

DRW: TRV

DATE: AUGUST 8, 2023

CKD: ZSS

APP: RMF

DOC: 227321-OII-DRW-ASD-002-01

SHEET 1 of 1

REV.
0

Y = 9,519,840.00

PROPOSED WELL LOCATIONS

LOCATION	BLOCK	CALLS		COORDINATES		LATITUDE	LONGITUDE	WD		
KC785 #3 ALT (SL)	KC/785	7,449.00' FEL	233.00' FSL	X = 1,925,031.00	Y = 9,504,233.00	26° 11' 25.431"N	92° 07' 54.476"W	6,612'		
KC785 #5 (SL)	KC/785	7,400.00' FEL	320.00' FSL	X = 1,925,080.00	Y = 9,504,320.00	26° 11' 26.289"N	92° 07' 53.931"W	6,612'		
KC785 #5 ALT (SL)	KC/785	7,300.00' FEL	320.00' FSL	X = 1,925,180.00	Y = 9,504,320.00	26° 11' 26.283"N	92° 07' 52.833"W	6,612'		

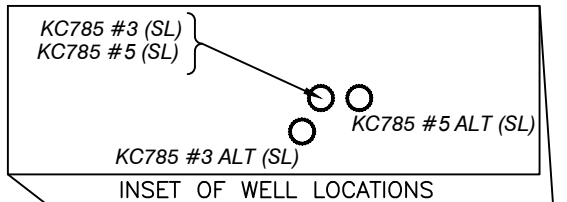
X = 1,916,640.00



2 (G25806)

X = 1,932,480.00

KC785
OCS-G25806
LLOG EXPLORATION OFFSHORE LLC



SEE INSET

Y = 9,504,000.00

1 (G25806)



PUBLIC INFORMATION

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



DOCD PLAT

**PROPOSED WELLS #3, #3 ALT #5, & #5
ALT OCS-G 25806 BLOCK 785
KEATHLEY CANYON AREA**

Echo OFFSHORE LLC
36499 Perkins Road
Prairieville, Louisiana 70769
Tel: 225-673-2163



GULF OF MEXICO

DATUM: NAD 27	SPHEROID: CLARKE 1866	PROJECTION: U.T.M.	ZONE: 15	DRAWN BY: RJN	CHK. BY: MEK	REV. No.: 2	JOB No.: 22-007	DWG No.: 22-007-EXP_KC785_R2
				DATE: 2/9/2022	REV. DATE: 2/15/2022	SCALE: 1"=2,000'	SHEET 1 OF 1	

GRID NORTH

2339.09'

1978.34'

No. 002 ST01 BP00	
Surface Location	
NAD27 BLM15 Feet	
X :	1,930,501.66'
Y :	9,501,660.91'
Lat :	26°10'59.5822"N
Lon :	92°06'54.5972"W
NAD83 BLM15 Feet	
X :	1,930,478.70'
Y :	9,502,307.44'
Lat :	26°11'00.6751"N
Lon :	92°06'54.7834"W

KC829
OCS-G-25814
LLOG

1

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

NOTES

1. THIS PLAT WAS PREPARED FOR PERMIT PURPOSES ONLY, AND IS NOT A PROPERTY BOUNDARY SURVEY, AND AS SUCH DOES NOT COMPLY WITH THE "STANDARDS OF PRACTICE FOR BOUNDARY SURVEYS" AS ADOPTED BY THE LOUISIANA PROFESSIONAL ENGINEERING AND LAND SURVEYING BOARD.
2. COORDINATES TRANSFORMED USING NADCON (VER. 2.1).



Stephen Henry
 STEPHEN R. HENRY RPLS #4903
 STATE OF LOUISIANA
 FIRM REGISTRATION NO. VF485 *8-6-18*

PUBLIC INFORMATION



FINAL LOCATION
OCS-G-25814 WELL No. 002 ST01 BP00
 BLOCK 829
 KEATHLEY CANYON AREA
 GULF OF MEXICO

Geodetic Datum: NAD27
 Projection: BLM 15 (NORTH)
 Grid Units: US SURVEY FEET

SCALE 0 2000
 1:24000 FEET



FUGRO USA MARINE, INC.
 6100 Hillcroft Ave
 Houston, Texas 77081
 (713) 346-3700

Job No.: 18010282

Date: 4/6/2018

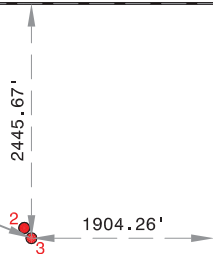
Drwn: MM

Chart: 1 Of: 1

DWG File: 1801028201_KC829_F_2ST1_G25814



No. 003 ST00 BP01	
Well Surface	
NAD27 BLM15 Feet	
X:	1,930,575.74'
Y:	9,501,554.33'
Lat:	26°10'58.5213"N
Lon:	92°06'53.7918"W
NAD83 BLM15 Feet	
X:	1,930,552.78'
Y:	9,502,200.86'
Lat:	26°10'59.6142"N
Lon:	92°06'53.9779"W



KC829
OCS-G-25814
LLOG



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



Digitally signed by Stephen R Henry
 Date: 2018.06.19 10:36:50 -05'00'

STEPHEN R. HENRY RPLS #4903
 STATE OF LOUISIANA
 FIRM REGISTRATION NO. VF485

NOTES

1. THIS PLAT WAS PREPARED FOR PERMIT PURPOSES ONLY, AND IS NOT A PROPERTY BOUNDARY SURVEY, AND AS SUCH DOES NOT COMPLY WITH THE "STANDARDS OF PRACTICE FOR BOUNDARY SURVEYS" AS ADOPTED BY THE LOUISIANA PROFESSIONAL ENGINEERING AND LAND SURVEYING BOARD.
2. COORDINATES TRANSFORMED USING NADCON (VER. 2.1).

PUBLIC INFORMATION



FINAL LOCATION
OCS-G-25814 WELL No. 003 ST00 BP01
 BLOCK 829
 KEATHLEY CANYON AREA
 GULF OF MEXICO

Geodetic Datum: NAD27
 Projection: BLM 15 (NORTH)
 Grid Units: US SURVEY FEET



FUGRO USA MARINE, INC.
 6100 Hillcroft Ave.
 Houston, Texas 77081
 (713) 346-3700

Job No.: 18010582 Date: 6/15/2018
 DWG File: 18010582_KC829_F_3_G25814

Drwn: EA

Chart: 1 Of: 1

KC785

OCS-G-25806
LLOG



OCS-G-25814 WELL No. 004 ST00BP01	
FINAL SURF. LOCATION	
X=	1,925,036.77'
Y=	9,504,252.54'
Lat=	26°11'25.624"N
Lon=	92°07'54.411"W
NAD83	
Lat=	26°11'26.716"N
Lon=	92°07'54.600"W

KEATHLEY CANYON AREA

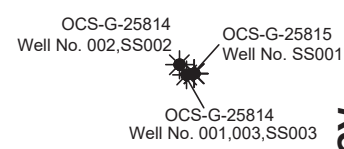
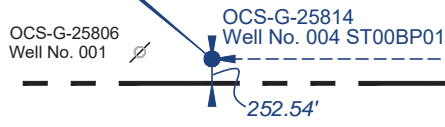
KC784

KC786

X=1,916,640.00'

X=1,932,480.00'

Y=9,504,000.00'



KC828

KC830

- NOTES:
1. DP RIG *NOBLE FAYE KOZACK* SPUDDED WELL ON JULY 27, 2023.
 2. FINAL SURFACE LOCATION REPRESENTS AFT ROTARY POSITION AT TIME OF SPUD IN.
 3. OBSERVED ITRF COORDINATES (C-NAV, CURRENT REALIZATION AND EPOCH) TRANSFORMED TO NAD83(2011) VIA HTDP PROCESS EQUIVALENT TO "EPSG:7807, ITRF2008 TO NAD83(2011) (1)".
 4. NAD83(2011) COORDINATES TRANSFORMED TO NAD27 VIA NADCON 2.1, EQUIVALENT TO "EPSG:1241, NAD27 TO NAD83 (1)" WHERE NAD83(2011) AND NAD83(86) ARE CONSIDERED FUNCTIONALLY THE SAME.
 5. THE NUMBER OF SIGNIFICANT FIGURES OF THE COORDINATE VALUES AND DISTANCES SHOWN HEREON IS FOR THE SAKE OF MAINTAINING COMPUTATIONAL PRECISION/INTER CONVERTIBILITY AND SHOULD NOT BE CONSTRUED AS AN EXPRESSION OF ABSOLUTE SPATIAL ACCURACY.

KC829

OCS-G-25814
LLOG

PUBLIC INFORMATION

I, ROBERT M. FROST, HEREBY CERTIFY THAT THE ABOVE FINAL SURFACE LOCATION IS CORRECT.

Robert M. Frost
ROBERT M. FROST
License No. 4573

ROBERT M. FROST
PROFESSIONAL LAND SURVEYOR
LOUISIANA REGISTRATION No. 4573

Digitally signed by: Robert M. Frost, PLS
Date: 2023.10.31 14:35:28 -05'00"

OCS-G-25814 Well No. 004 ST00BP01
BLOCK 829 - KEATHLEY CANYON AREA

U.S. SURVEY FEET (1"=2,000')

PREPARED BY:

OCEANERING INTERNATIONAL, INC.
202 STANTON STREET
BROUSSARD, LA 70518
(337) 210-0000
LA Reg. No. 747

JOB: 227321	DRW: MFG	DATE: OCTOBER 31, 2023
CKD: ZSS	APP: RMF	SHEET 1 of 1
DOC: 227321-OII-DRW-ASD-004-01		

Y= 9,504,000

LLOG EXPLORATION OFFSHORE, INC.
OCS-G 25814

**Proposed Surface
Loc #5 & ALT #5**



KC 829

X= 1,916,640

X= 1,932,480

Y= 9,488,160

SURFACE LOCATION #5:

X: 1,918,245.00 Y: 9,497,957.00
Lat: 26 deg, 10 min, 23.696 sec
Long: 92 deg, 09 min, 09.440 sec
1605.00' FWL 6043.00' FNL
(NAD27)

SURFACE LOCATION ALT #5:

X: 1,918,245.00 Y: 9,498,007.00
Lat: 26 deg, 10 min, 24.192 sec
Long: 92 deg, 09 min, 09.437 sec
1605.00' FWL 5993.00' FNL
(NAD27)

Public



Keathley Canyon Block 829
Gulf of Mexico

Location Map



3/24
Geo: Cody Lewis

LLOG EXPLORATION OFFSHORE, LLC
OCS-G 25813

KC 828


X= 1,900,800

Y= 9,488,160

X= 1,916,640

**Proposed
Surface
KC 828 #1**

**Proposed
Surface
KC 828
ALT #1**



KC 872

LLOG EXPLORATION OFFSHORE, LLC
OCS-G 25823

SURFACE LOCATION 828 #1:

X: 1,908,755.00 Y: 9,486,000.00
Lat: 26 deg, 08 min, 25.835 sec
Long: 92 deg, 10 min, 54.458 sec
7885.00' FEL 2160.00' FNL
(NAD27)

SURFACE LOCATION 828 ALT #1:

X: 1,908,330.00 Y: 9,485,867.00
Lat: 26 deg, 08 min, 24.544 sec
Long: 92 deg, 10 min, 59.132 sec
7530.00' FWL 2293.00' FNL
(NAD27)

Public



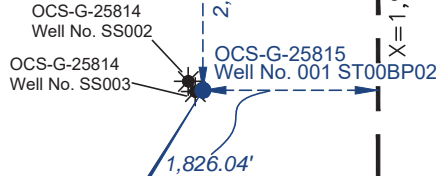
Keathley Canyon Block 872/828
Gulf of Mexico

Location Map



3/24
Geo: Cody Lewis

Y=9,504,000.00'



OCS-G-25815 WELL No. 001 ST00BP02 FINAL SEAFLOOR LOCATION	
X=	1,930,653.96'
Y=	9,501,568.12'
Lat=	26°10'58.653"N
Lon=	92°06'52.932"W
NAD83	
Lat=	26°10'59.746"N
Lon=	92°06'53.118"W



Ø
OCS-G-25814
Well No. 001

KC829
OCS-G-25814
LLOG

KC830
OCS-G-25815
LLOG

- NOTES:
1. DP RIG WEST NEPTUNE SPUNDED WELL INSIDE MARKER BUOY SET ON SEPT. 20, 2021. MARKER BUOYS SET BY UTEC ABOARD THE NORTH OCEAN 102 UTILIZING LBL POSITIONING ON MARCH 1, 2019. REFER TO UTEC REPORT 18-049-0019 BUCKSKIN - UMB INSTALL FINAL REPORT REV0.
 2. FINAL SEAFLOOR LOCATION REPRESENTS MARKER BUOY CENTER COORDINATE COMPUTED BY AN EQUALLY-WEIGHTED LEAST SQUARES BEST FIT SOLUTION.
 3. NAD83(2011) COORDINATES TRANSFORMED TO NAD27 VIA NADCON 2.1, EQUIVALENT TO "EPSG:1241, NAD27 TO NAD83 (1)" WHERE NAD83(2011) AND NAD83(86) ARE CONSIDERED FUNCTIONALLY THE SAME.
 4. THE NUMBER OF SIGNIFICANT FIGURES OF THE COORDINATE VALUES AND DISTANCES SHOWN HEREON IS FOR THE SAKE OF MAINTAINING COMPUTATIONAL PRECISION/INTER CONVERTIBILITY AND SHOULD NOT BE CONSTRUED AS AN EXPRESSION OF ABSOLUTE SPATIAL ACCURACY.

KEATHLEY
CANYON
AREA

Y=9,488,160.00'

KC873 KC874 PUBLIC INFORMATION

STATE OF LOUISIANA
I, ROBERT M. FROST, HEREBY CERTIFY THAT THE ABOVE FINAL SEAFLOOR LOCATION IS CORRECT.

NOT CERTIFIED UNLESS
ROBERT M. FROST
License No. 4573

Robert M. Frost
Digitally signed by: Robert M. Frost, PLS
Date: 2022.01.25 09:32:03 -06'00'

ROBERT M. FROST
PROFESSIONAL LAND SURVEYOR
LOUISIANA REGISTRATION No. 4573

LLDG
exploration

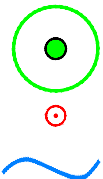
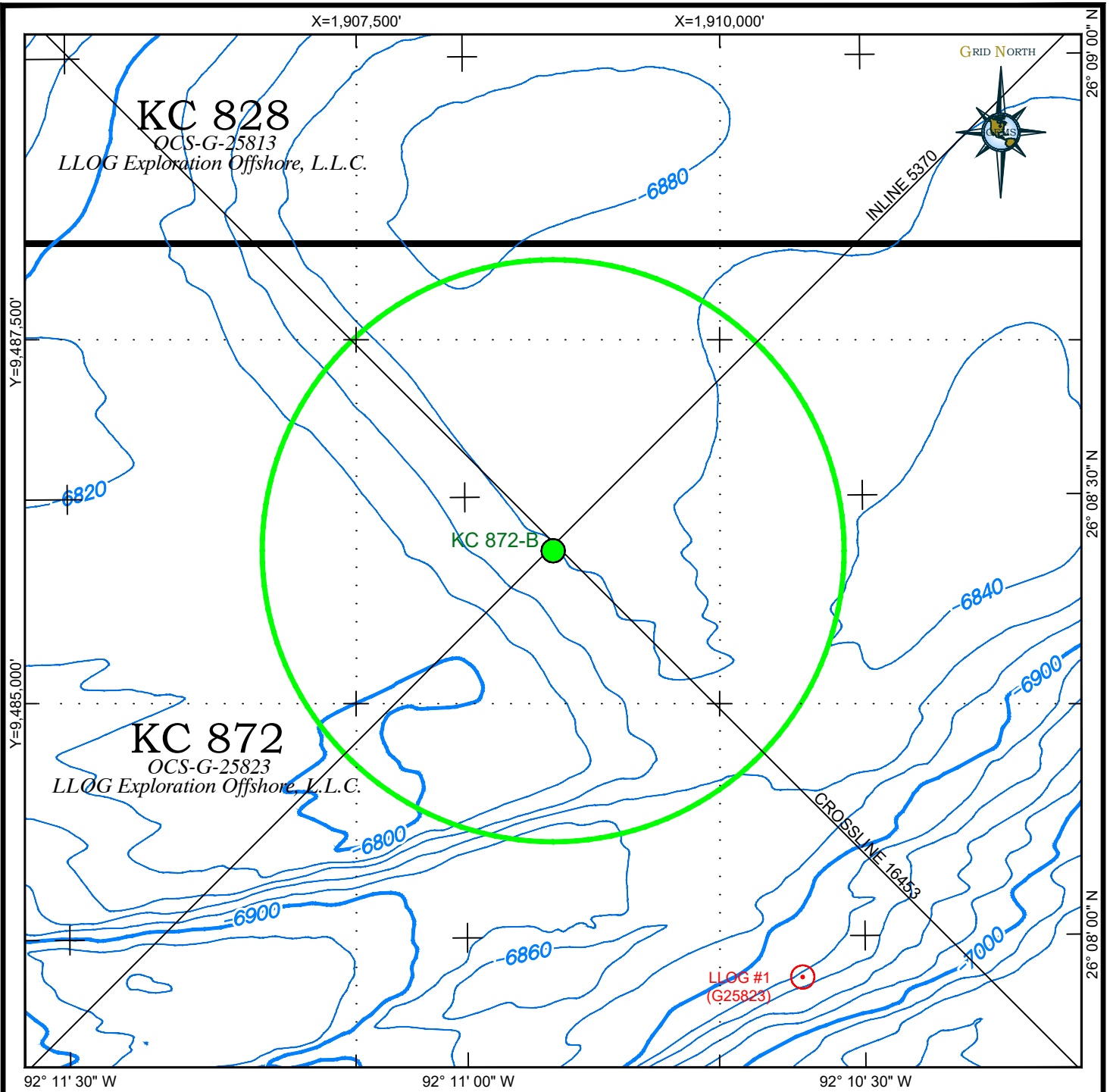
OCS-G-25815 Well No. 001 ST00BP02
BLOCK 830 - KEATHLEY CANYON AREA

2,000 0 2,000
U.S. SURVEY FEET (1"=2,000')

PREPARED BY: OCEANEERING	OCEANEERING INTERNATIONAL, INC. 730 E. KALISTE SALOOM RD. LAFAYETTE, LA 70508 (337) 210-0000 LA Reg. No. 747	JOB: 214789	DRW: ZSS	DATE: JANUARY 24, 2022
		CKD: EJB	APP: BSG	SHEET 1 of 1
		DOC: 214789-OII-DRW-LOC-002-01		

Bathymetry Map

Attachment A-3 (Public Information)



PROPOSED WELL LOCATION.
CIRCLE REPRESENTS
2000 FT RADIUS AROUND
PROPOSED WELLSITE.

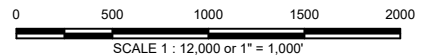
EXISTING WELL LOCATION,
AS REPORTED BY BOEM.

WATER DEPTH CONTOUR IN FEET.

LLOG Exploration Offshore, LLC.

BATHYMETRY MAP

BLOCK 872
KEATHLEY CANYON AREA
GULF OF MEXICO

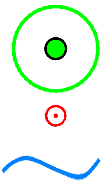
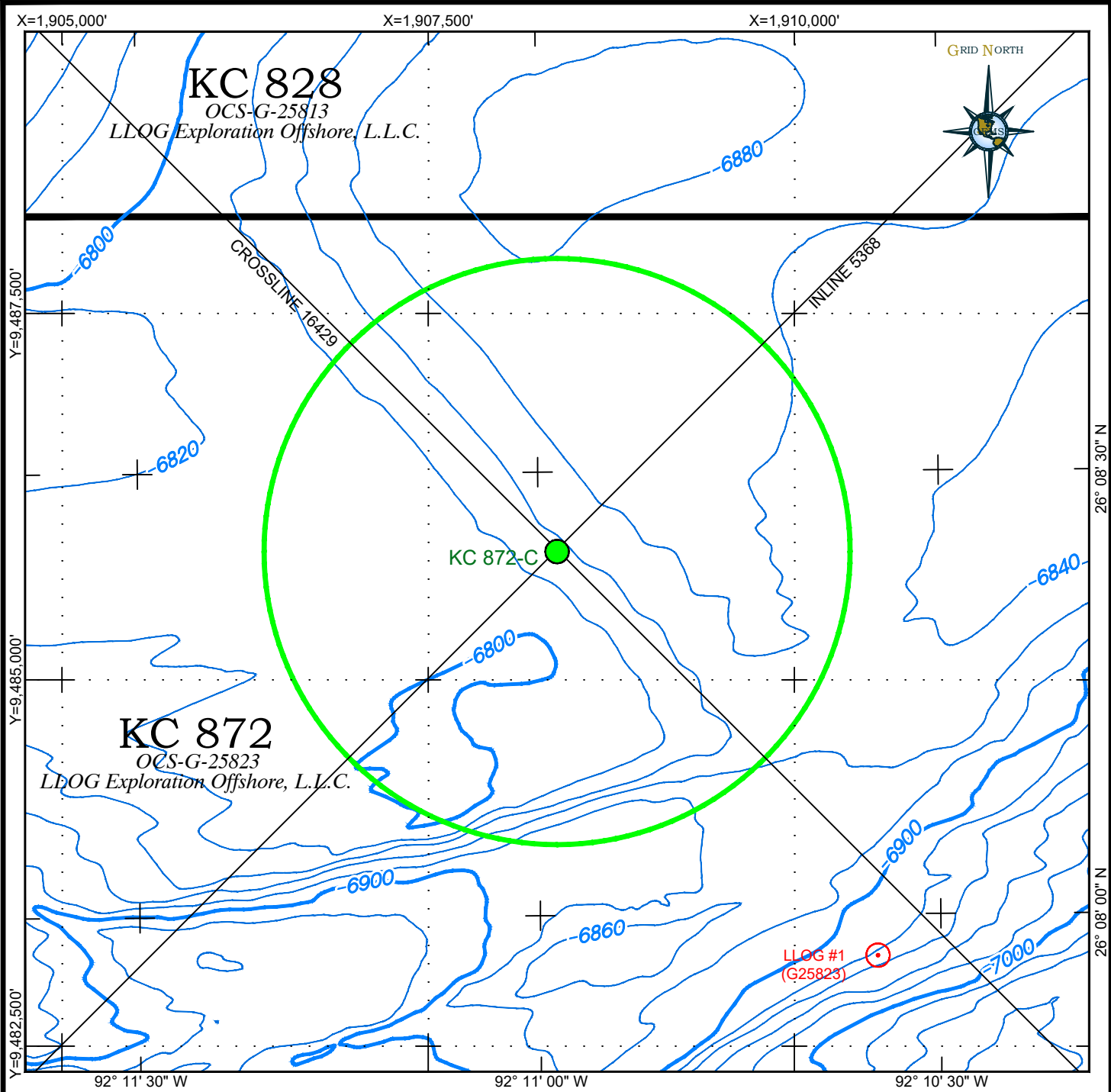


GEODETTIC DATUM: NAD 1927
ELLIPSOID: CLARKE 1866
PROJECTION: UTM
ZONE: 15 NORTH
GRID UNITS: US FEET



DATE: 13 JUNE 2023
FILE NAME: 3156_WELL_B_REV.DWG
PROJECT NO.: 0123-3156

MAP NO. KC 872-B-1



PROPOSED WELL LOCATION.
CIRCLE REPRESENTS
2000 FT RADIUS AROUND
PROPOSED WELLSITE.

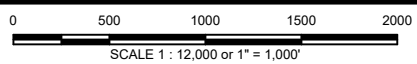
EXISTING WELL LOCATION, AS
REPORTED BY BOEM.

WATER DEPTH CONTOUR IN FEET.

LLOG Exploration Offshore, LLC.

BATHYMETRY MAP

**BLOCK 872
KEATHLEY CANYON AREA
GULF OF MEXICO**

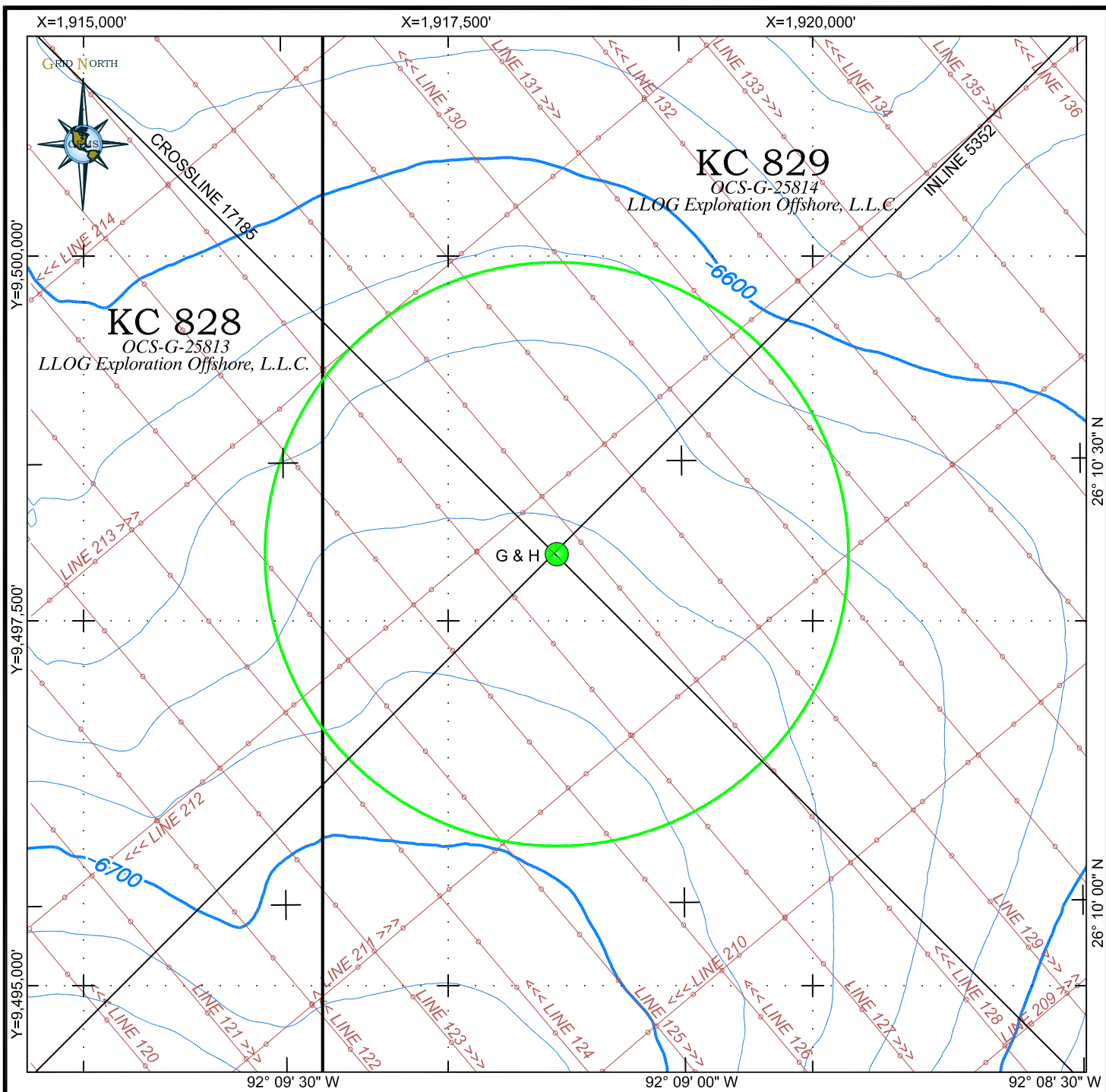



GEODETIC DATUM: NAD 1927
ELLIPSOID: CLARKE 1866
PROJECTION: UTM
ZONE: 15 NORTH
GRID UNITS: US FEET

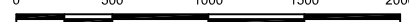


DATE: 13 JUNE 2023
FILE NAME: 3156_WELL_C_REV.DWG
PROJECT NO.: 0123-3156

MAP NO. KC 872-C-1



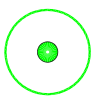




BATHYMETRY MAP
 BLOCK 829
 KEATHLEY CANYON AREA
 GULF OF MEXICO

0 500 1000 1500 2000

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

DATE: 13 APRIL 2022
 FILE NAME: 3091_WELL_KC829_GH.DWG
 PROJECT NO.: 0422-3091

MAP NO. KC 829-G&H-1

 3-D SURVEY LINE.
 AUV SURVEY LINE.
 PROPOSED WELL LOCATION.
 CIRCLE REPRESENTS
 2000 FT RADIUS AROUND
 PROPOSED WELLSITE.
 WATER DEPTH CONTOUR IN FEET.
 CONTOUR INTERVAL 20 FT.

GEODETIC DATUM: NAD 1927
 ELLIPSOID: CLARKE 1866
 PROJECTION: UTM
 ZONE: 15N
 GRID UNITS: US FEET



COST RECOVERY PAYMENT

Attachment A-4 (Public Information)

Sue Sachitana

From: John Richard
Sent: Wednesday, April 3, 2024 2:00 PM
To: Sue Sachitana
Cc: Kim DeSopo
Subject: FW: Pay.gov Payment Confirmation: BOEM Development/DOCD Plan - BD

Importance: High

See Pay.Gov receipt below.

From: notification@pay.gov <notification@pay.gov>
Sent: Wednesday, April 3, 2024 1:58 PM
To: John Richard <johnr@llog.com>
Subject: Pay.gov Payment Confirmation: BOEM Development/DOCD Plan - BD



An official email of the United States government



Your payment has been submitted to the designated government agency through [Pay.gov](https://www.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](https://www.pay.gov) Tracking ID: 27DA14SD
Agency Tracking ID: 76682459213

Account Holder Name: LLOG Exploration Offshore, LLC
Transaction Type: ACH Debit
Transaction Amount: \$5,017.00
Payment Date: 04/04/2024

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

Transaction Date: 04/03/2024 02:58:24 PM EDT

Total Payments Scheduled: 1

Frequency: OneTime

Region: Gulf of Mexico

Contact: John Richard (985) 801-4300

Company Name/No: LLOG Exploration Offshore, L.L.C., 02058

Lease Number(s): 25806, 25814, 25815, 25813, 25823

Area-Block: Keathley Canyon KC, 785: Keathley Canyon KC, 829: Keathley Canyon KC, 830:

Keathley Canyon KC, 828: Keathley Canyon KC, 872

Type-Wells: Supplemental Plan, 1

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

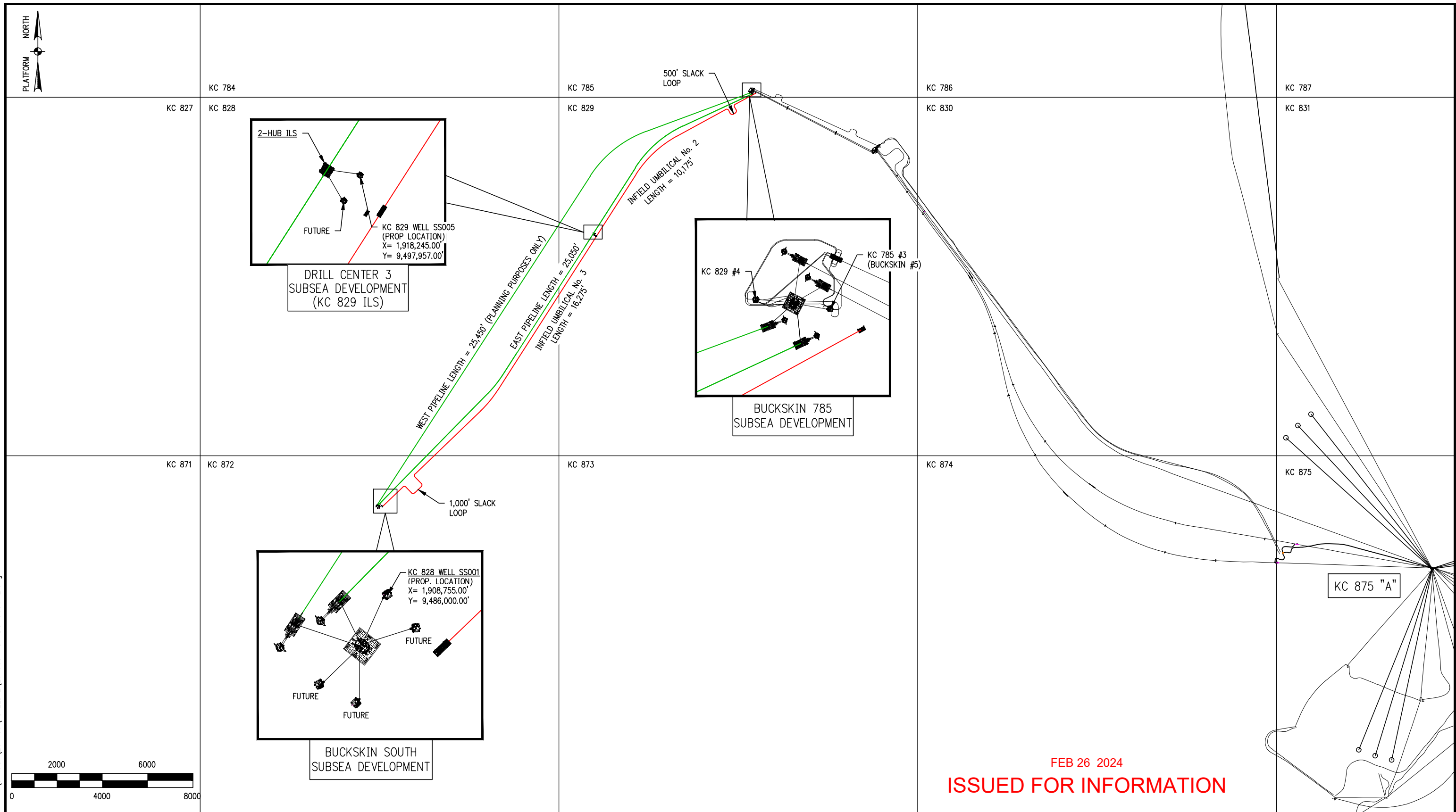


[Pay.gov](https://www.pay.gov) is a program of the U.S. Department of the Treasury, Bureau of the Fiscal Service

CONCEPTUAL FIELD DEVELOPMENT

Attachment A-5 (Public Information)

JGUEVARA 2/26/2024 7:56:45 AM P:\STRUCT\204609\PIPELINE\204609-PIP-DG-9630-E.dwg



FEB 26 2024
 ISSUED FOR INFORMATION

NOTES
 THE WEST PIPELINE IS SHOWN FOR MASTER PLANNING PURPOSES ONLY AND WILL NOT BE INSTALLED AS PART OF THE BUCKSKIN SOUTH EXPANSION.

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
E	2-26-24	ISSUED FOR INFORMATION	JCG	RAC
D	1-16-24	ISSUED FOR INFORMATION	JCG	RAC
C	12-13-23	ISSUED FOR INFORMATION	JCG	RAC
B	11-21-23	ISSUED FOR INFORMATION	ROD	RAC
A	10-30-23	ISSUED FOR INFORMATION	ROD	RAC

PINNACLE ENGINEERING
 TX REGISTERED ENGR FIRM F-567

APPROVAL	
Drawn By	
Date	
Checked By	
Date	
Designed By	
Date	
Approved By	
Date	

LLOG exploration

BUCKSKIN SOUTH SUBSEA DEVELOPMENT
 KC 872 TO KC 875

BUCKSKIN SOUTH SUBSEA PROPOSED LAYOUT
 FOR HAZARD SURVEY

DWG. NO. 204609-PIP-DG-9630-E

APPENDIX B
GENERAL INFORMATION
(30 CFR Part 550.213 and 550.243)

A. Applications and Permits

There are no Federal/State applications to be submitted for the activities provided for in this Plan (exclusive to BOEM/BSEE permit applications and general permits issued by the EPA and COE)

Application/Permit	Issuing Agency	Status
LA Coastal Zone Consistency Certification	Louisiana Dept. of Natural Resources	Pending
APD	BSEE	To be Filed
APM	BSEE	As Needed

B. Drilling Fluids

Type of Drilling Fluid	Estimated Volume of Drilling Fluid to be used per Well
Water Based (seawater, freshwater, barite)	See Appendix G, Table 1 of this Plan
Oil-based (diesel, mineral oil)	N/A
Synthetic-based (internal olefin, ester)	See Appendix G, Table 2 of this Plan

C. Production

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

Flow estimates are combined rates for 4 wells

Type	Average Production Rate	Peak Production Rate	Life of Reservoir
Oil	27,200 BOPD	59,700 BOPD	30 years
Gas	6,800 MCFPD	17,925 MCFPD	30 years

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:

Characteristics	Results	Analytical Methodologies Should be Compatible with:
1. Gravity (API)	31.0	ASTM D4052
2. Flash Point (°C)	12.2	ASTM D93/IP 34
3. Pour Point (°C)	<-10	ASTM D97
4. Viscosity (Centipoise at 25°C)	29.463	ASTM D445
5. Wax Content (wt %)	0.37	Precipitate with 2-butanon/dichloromethane (1 to 1 volume) at -10°C
6. Asphaltene Content (wt %)	2.2	IP Method 143/84
7. Resin Content (wt %)	13.20	Jokuty et al, 1996
8. Boiling point distribution including, for each fraction, the percent volume or weight and the boiling point range in °C	Not Available	ASTM D2892 (RBP distillation) or ASTM D2887/5307
9. Sulphur (wt %)	2.50	ASTM D4294

The above analysis is based on the oil composition most likely to result in the largest volume spill (e.g., the oil from the expected largest reservoir, stored oil or pipeline oil combined from a number of wells).

Oil from Oil Well

Keathley Canyon 785
BOEM Platform ID
API Well No: 608084002100
Sample Depth: 25,522' MD (25,521.7'
TVD)
Reservoir Name: Upper Wilcox
Sample Date: 9/15/2011
Sample No: 2.07

E. New Or Unusual Technology

LLOG does not propose using any new and/or unusual technology for the operations proposed in this Initial Development Operations Coordination Document.

F. Bonding Statement

The bond requirements for the activities and facilities proposed in this Supplemental DOCD are satisfied by an area wide bond, furnished and maintained according to 30 CFR Part 556; subpart I; NTL No. 2015-N04, “General Financial Assurance” and additional security under 30 CFR 556.901.

G. Oil Spill Responsibility (OSFR)

LLOG Exploration Offshore, L.L.C (MMS Co. No. 02058) will demonstrate oil spill financial responsibility for the facilities proposed in this Supplemental Development Operations Coordination Document according to 30 CFR Part 553, and NTL No. 2008-N05 “Guidelines for Oil Spill Financial Responsibility (OSFR) for Covered Facilities.”

H. Deepwater Well Control Statement

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

I. Suspensions of Production

LLOG Exploration Offshore, L.L.C. has not filed for a Suspension of Production (SOP) for the Keathley Canyon Block 872 Unit, Agreement No. 754315001.

J. Blowout Scenario

The Worst-Case Discharge (WCD) was accepted and approved in Chevron’s Supplemental Exploration Plan S-7655. LLOG does not believe the proposed well in this plan will exceed the existing WCD of 242,027 as indicated in Chevron’s Supplemental EP and will stipulate to that WCD as well. WCD calculations will not be included as part of this plan. The Blowout Scenario, including Site Specific Proposed Relief Well and Intervention Planning and Relief Well Response Time Estimate (Public Information) – was submitted as part of Supplemental DOCD (S-8075).

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

A. Geological Description

Included as *Attachment C-1*

B. Structure Contour Maps

Included as *Attachment C-2* 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 each proposed bottom hole location and applicable geological cross section.

C. Interpreted Seismic Lines

Included as *Attachment C-3* is a copy of the migrated and annotated (shot points, time lines, well paths) deep seismic line within 500 feet of the surface location being proposed in this Plan.

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-4*. Such cross section corresponds to each seismic line being submitted.

E. Shallow Hazards Report

Shallow Hazards and Archaeological Assessment was prepared by Geoscience Earth & Marine Services Inc. (GEMS) for the OCS-G-25814 Lease, Block 829, Keathley Canyon Area and was filed with BOEM by letter dated May 22, 2017. A Shallow Hazards and Archaeological Assessment was conducted over Blocks 871 / 872 Keathley Canyon Area and was prepared by Geoscience Earth and Marine Services in May 2019. The survey report was submitted to BOEM under separate cover letter on May 22, 2019.

F. Shallow Hazards Assessment

Utilizing the 3D deep seismic exploration data a shallow hazards analysis was prepared for the proposed surface locations, evaluating seafloor and subsurface geologic and manmade features and conditions, and is included as *Attachment C-5*.

G. Stratigraphic Column

A generalized biostratigraphic/lithostratigraphic column from the seafloor to the total depth of the proposed wells is included as *Attachment C-6*.

H. Time vs Depth Tables

LLOG has determined that there is existing sufficient well control data for the target areas proposed in this Plan; therefore, tables providing seismic time versus depth for the proposed well locations are not required.

Geologic Description

Attachment C-1 (Proprietary Information)

Structure Contour Maps

Attachment C-2 (Proprietary Information)

Interpreted Seismic Lines

Attachment C-3 (Proprietary Information)

Geological Cross Sections

Attachment C-4 (Proprietary Information)

Shallow Hazards Assessment

Attachment C-5 (Proprietary Information)



A Geosyntec Company

15810 Park Ten Place, Suite 100
Houston, Texas 77084
www.gemsinc.com

June 13, 2023

Project No.: 0123-3156

LLOG Exploration Offshore, LLC
City Centre Three
842 W. Sam Houston Pkwy N.,
Suite 600
Houston, TX 77024

Attention: Mr. Jaime Mata

**Site Clearance Letter,
Proposed Wellsite KC 872-C
Block 872 (OCS-G-25823),
Keathley Canyon Area,
Gulf of Mexico**

LLOG Exploration Offshore, LLC (LLOG) contracted Geoscience Earth & Marine Services (GEMS, a Geosyntec Company) to provide an assessment of the seafloor and shallow geologic conditions to determine the favorability of drilling operations for the proposed location KC 872-C whose surface location is in Block 872 (OCS-G-25823), Keathley Canyon (KC) Area, Gulf of Mexico.

This letter addresses specific seafloor and subsurface conditions around the proposed location to the Top of Salt, at about 3,593 ft below the mudline (bml). Surface conditions appear feasible for drilling at the proposed wellsite. There is a negligible to low potential for encountering shallow gas or shallow water flow in the sediments above salt. This letter provides details specific to the well location, including available data, Notice to Lessees (NTL) requirements, man-made features, and wellsite conditions.

Proposed Well Location

The surface location for the proposed Wellsite C lies in the northcentral portion of KC 872. The coordinates for the proposed wellsite are as follows:

Table C-1. Proposed Location Coordinates

Proposed Wellsite KC 872-C			
Spheroid & Datum: Clarke 1866 NAD27 Projection: UTM Zone 15 North		3-D Seismic Line Reference	Block Calls (KC 872)
X: 1,908,380 ft	Latitude: 26° 08' 24.620" N	Inline 5368	7,580 ft FWL
Y: 9,485,875 ft	Longitude: 92° 10' 58.583" W	Crossline 16429	2,285 ft FNL

LLOG will drill this well using a dynamically positioned drilling vessel. Our assessment addresses the seafloor conditions within a 2,000 ft radius of the surface location.

A re-spud (alternative) location, KC 872-ALT C re-spud, lies approximately 51 ft west-southwest of the proposed primary wellsite. The seafloor and subsurface conditions to the Top of Salt are expected to be very similar to the currently proposed wellsite.

Table C-2. Proposed Re-Spud Location Coordinates

Proposed Wellsite KC 872-ALT C			
Spheroid & Datum: Clarke 1866 NAD27 Projection: UTM Zone 15 North		3-D Seismic Line Reference	Block Calls (KC 872)
X: 1,908,330 ft	Latitude: 26° 08' 24.544" N	Inline 5368	7,530 ft FWL
Y: 9,485,867 ft	Longitude: 92° 10' 59.132" W	Crossline 16425	2,293 ft FNL

Available Data

The following discussion is based on the findings from the geohazard assessment performed within Blocks 871 and 872 (GEMS, 2019). The subsurface geologic conditions were assessed within the aforementioned blocks, which is referred to as the "Study Area" (Figure C-1). GEMS (2019) provided a one-block halo around the KC 871-872 Study Area to encompass the detailed seafloor assessment area, which is referred to as the "3-D Survey Area". The archaeological assessment covers the Study Area plus a 2,000 ft buffer within the limits of the high-resolution geophysical AUV data. This is referred to as the "Archaeological Assessment Area". The AUV data within the limits of the Survey Area is referred to as "AUV Survey Coverage". The 3-D and AUV Survey Areas cover approximately 108 mi² and 36 mi² respectively.

LLOG provided a conventional 3-D seismic depth volume and acquired the rights and permissions from Chevron U.S.A., Inc (Chevron) to use the high-resolution geophysical autonomous underwater vehicle (AUV) data collected over a portion of the Buckskin prospect area. Both datasets were used for this assessment. The high-resolution data were collected using an AUV and comprises the following data: side-scan sonar, multibeam bathymetry, and subbottom profiler (SBP). The detailed data specifications are provided in Appendix B of the GEMS shallow hazards and archaeological report (GEMS, 2019).

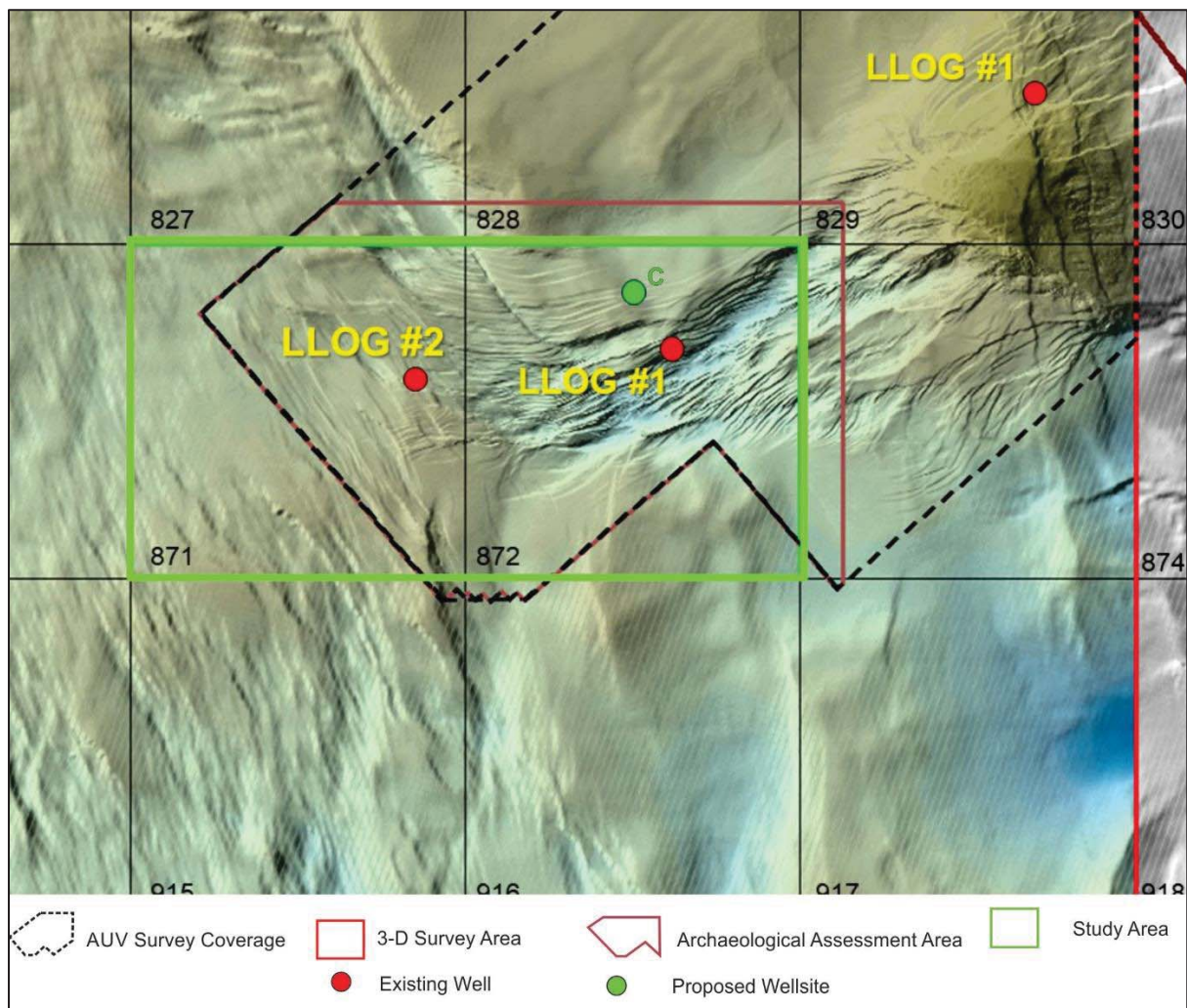


Figure C-1. Seafloor Rendering Showing the Proposed Wellsite Location

Attachments

Wellsite maps are centered on the Proposed Wellsite C and are displayed at a 1 inch = 1,000 ft scale (1:12,000). The maps included in this letter are as follows:

Map No. KC 872-C-1:	Bathymetry Map
Map No. KC 872-C-2:	Seafloor Features Map
Map No. KC 872-C-3:	Side-Scan Sonar Mosaic
Map No. KC 872-C-4:	Seafloor Amplitude Rendering
Map No. KC 872-C-5:	Geologic Features Map

The accompanying illustrations were extracted from the available datasets and are listed below:

Illustration KC 872- C-1: Subbottom Profiler Line 101 Showing Near-Surface Conditions Beneath Proposed Wellsite C, Keathley Canyon Block 872

Illustration KC 872- C-2: Portions of Inline 5368 and Crossline 16429 Showing Conditions Beneath Proposed Wellsite KC 872-C.

Illustration KC 872- C-3: Tophole Prognosis Chart, Proposed Wellsite KC 872-C.

NTL Requirements

The following letter complies with the Bureau of Ocean Energy Management (BOEM) Notices to Lessees (NTL's) 2008-G04, 2009-G40, and 2022-G01, (MMS, 2008, 2010, and BOEM 2022) with respect to benthic community and shallow hazard assessments.

BOEM requires an assessment for potential archaeological resources prior to conducting drilling operations as per NTL 2005-G07 which was re-issued in 2020 (BOEM, 2020). To satisfy requirements of NTL 2005-G07, GEMS completed an archaeological assessment using high-resolution geophysical Autonomous Underwater Vehicle (AUV) survey data. The requirements of NTL 2005-G07 (BOEM, 2020), which are applicable for exploration or production activity, have been satisfied and the results were provided in Volume II of the GEMS shallow hazards and archaeological report.

As specified in NTL 2022-G01 (BOEM, 2022), GEMS generated a power spectrum diagram from the 3-D seismic data cube provided by LLOG at the proposed wellsite (Figure C-2). The extraction is generated from the data within a 2,000 ft radius of the proposed well and from the seafloor to Top of Salt. GEMS converted the amplitude vs. frequency spectrum, generated by the IHS software, to power vs. frequency by squaring the amplitude values as described by J. A. Coffeen, 1978. The frequency bandwidth at 50% power ranges between 33 Hz and 60 Hz.

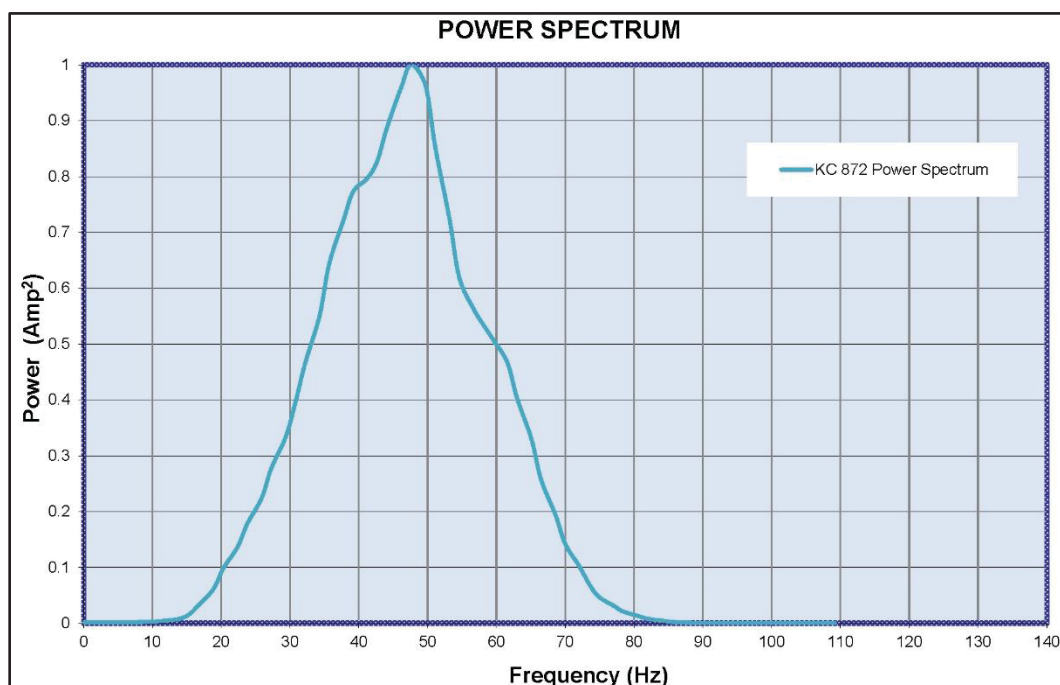


Figure C-2. Power Spectrum Curve (Frequency vs Power)

Man-Made Features

The surface location is clear of any wells, pipelines, or platforms within a 2,000 ft radius around the proposed wellsite. The closest existing well (LLOG KC 872-001) is located approximately 3,540 ft southeast of the Proposed Wellsite C (Figure C-1, Maps KC 872-C-2 through -5), BOEM 2023a. The well was drilled in 2008 to a total vertical depth (TVG) of 28,403 ft. The nearest pipeline lies about 5 miles northeast of the proposed wellsite.

Archaeological Assessment

The GEMS archaeologist reviewed the side-scan sonar, multibeam, and subbottom profiler data within KC 872 and surrounding blocks (GEMS, 2019). The data analysis detected 12 sonar contacts within the KC 871-872 Study Area and all contacts were considered modern debris (GEMS, 2019). The sonar contacts do not have an acoustic signature indicative of archaeological resources. No contacts occur within 2,000 ft of the proposed C wellsite location (Maps KC872-C-2 and -3). Based on the archaeological review of available AUV data, the Area of Potential Effect around the proposed C wellsite location appears clear of archaeological resources.

Wellsite Conditions

The proposed Wellsite C surface location is clear of any constraining seafloor conditions as defined by the AUV and 3-D seismic data. Overall, the proposed wellbore will likely penetrate clayey- to sandy-turbidites interbedded with mud-prone mass-transport deposits (MTDs). There is a negligible to low potential for minor shallow gas accumulations and overpressured sands within the suprasalt stratigraphy.

Water Depth and Seafloor Conditions. The water depth at the Proposed Wellsite C is -6,835 ft below sea level (Map KC 872-C-1). The seafloor slopes at approximately 3.4° to the northeast. The seafloor morphology appears relatively smooth at the proposed surface location.

The nearest seafloor fault to the proposed well location lies about 1,485 ft to the south-southeast (Map KC 872-C-2). The seafloor fault trends southwest to northeast and is downthrown to the southeast away from the proposed wellsite. Seafloor slopes along this fault scarp are over 10° and the seafloor offset is approximately 15 ft. This fault approximates the top of the northern flank of a highly faulted graben valley.

The proposed location occurs between two buried faults with seafloor expression (Illustration KC 872-C-1 and Maps 872-C-2). The nearest buried fault with seafloor expression lies about 125 ft northwest and the second buried fault is about 250 ft to the southeast (Illustration KC 872-C-1 and Map KC 872-C-2). The buried faults trend southwest to northeast and are downthrown to the northwest. The buried fault to the southeast is downthrown toward the proposed wellsite (Map KC 872-C-2). This fault is buried by approximately 35 ft of well layered sediments and the fault plane is projected to intersect the well bore over 350 ft bml.

The side-scan sonar reflectivity and low seafloor amplitude response within a 2,000 ft radius of the proposed wellsite suggest the seabed is covered by very soft to soft clays (Maps KC 872-C-3 and C-4).

Deepwater Benthic Communities. BOEM and BSEE have not reported the existence of high-density deepwater benthic communities within Federal lease Blocks KC 828 or KC 872 (MMS, 2010). There are no BOEM water bottom anomalies within 2,000 ft radius of the proposed surface location (BOEM, 2023b).

There are no apparent geophysical indicators and/or geologic features at the seafloor or within the subbottom profiler record that would suggest conditions capable of supporting high-density deepwater benthic communities at the proposed wellsite or within the 2,000 ft radius (Maps KC 872-C-2 through C-4).

Stratigraphy. Stratigraphic conditions from the subbottom profiler and 3-D seismic data are shown on Illustrations KC 872 C-1 through C-3. The seafloor, two horizons (Horizons 10 and 30), and the Top of Salt (ToS) were mapped within the suprasalt stratigraphy to define three sediment units (Units 1-3) within the Study Area (GEMS, 2019). Inferences from the seismic facies analysis suggest the stratigraphic section beneath the wellsite is characterized by hemipelagic clays, turbidites, and mass-transport deposits containing a mixture of clays, silts, and sands. Well logs of nearby wells are unavailable to confirm this interpretation.

The subbottom profiler data indicate that the uppermost shallow stratigraphy of Unit 1 (Seafloor to Horizon 10) is comprised of a 10 ft hemipelagic drape of very soft clays underlain by layered clays and silty clays to over 235ft bml (Illustration KC 872-C-1). Beneath the penetration of the subbottom profiler data, the 3-D seismic

data indicates Unit 1 consists of layered hemipelagic clays and silty clays interrupted by mud-prone MTDs to about 586 ft bml (Illustrations KC 872-C-2 and KC 872-C-3).

Horizon 10, the base of Unit 1, beneath the proposed location marks an erosion surface (Illustrations KC 872-C-2 and KC 872-C-3). The horizon northeast of the proposed location is irregular. The irregularities are created by small slump scars and channel like features. Sediments beneath Horizon 10 are likely overconsolidated.

Horizon 10 and Horizon 30 define Unit 2 from 586 ft bml to 1,933 ft bml (Illustrations KC 872-C-2 and C-3). Unit 2 likely consists of clayey- to sandy-turbidites possibly interbedded with thin mud-prone MTDs.

Horizon 30 and Top of Salt define Unit 3 from 1,933 ft bml to 3,593 ft bml (Illustrations KC 872-C-2 and C-3). Unit 3 likely consists of clayey- to sandy-turbidites possibly interbedded with thin mud-prone MTDs. The sediments within Unit 3 appear to be highly disturbed by the influx of shallow salt and faulting.

The Top of Salt is -10,428 ft bsl or 3,593 ft bml (Illustration KC 872-C-3). The salt surface dips to the northwest at ~25°. No inclusions or sutures are defined within the salt surface.

Faults. The subbottom profiler indicates no seafloor faults in the vicinity of the proposed wellsite. The fault plane of a buried fault to the southeast is projected to cross the well bore at around 350 ft bml (Illustration KC 872-C-1). The fault is inactive and buried by about 35 ft of stratified undeformed sediments. The fault is not defined by the 3-D data.

The 3-D data indicate a vertical wellbore at the proposed surface location is not expected to penetrate any seafloor faults above the salt interface (Illustrations KC 872-C-2 and C-3). The top of one deeply buried fault as defined by the 3-D data is projected to intersect the wellbore at about 1,665 ft bml (Illustration KC 872-C-3). There is no geophysical evidence to suggest the fault is an active pathway for fluid/gas migration. Loss of circulation may occur across fault planes.

Small undifferentiated faults (below the resolution of the 3-D seismic data) probably exist within the suprasalt stratigraphy at this location. Unit 3 from Horizon 30 to the Top of Salt is fractured and has potential for zones which may cause drilling fluid loss.

Shallow Gas and Shallow Water Flow. Significant shallow gas is not likely to be encountered within the shallow sediments from the seafloor to the ToS (3,593 ft bml), Illustration KC 872-C-3. The potential for shallow gas and shallow water flow varies between negligible and low.

Shallow Gas. There are no apparent subsurface high-amplitude anomalies directly below the proposed surface location (Map KC 872-C-5). No bottom simulating reflector (BSR) or other seismic evidence of gas hydrates were observed at the proposed location.

There is a negligible potential for gas within the upper 586 ft of sediments within Unit 1. There is a low potential for minor accumulations of gas within sandy turbidites within Units 2 and 3, between 586 ft bml and 3,593 ft bml (Horizon 10 to ToS).

Shallow Water Flow. The potential for encountering shallow water flow (SWF) is considered negligible within clays and silts in Unit 1. The potential for encountering SWF is considered low within possible sandy turbidites between 586 ft bml and 3,593 ft bml (Horizon 10 to ToS), Illustration KC 872-C-3. Thin sands are possible; however, the thin overburden and highly fractured section above salt makes overpressures unlikely.

SWF was not reported while drilling the wells near the proposed wellsite. The closest well that reported SWF lies about nine miles east-southeast of Proposed Wellsite C, in block KC 875. The Anadarko #SS1 well experienced a low severity shallow water flow at about 3,256 ft bml (BOEM, 2023c); however, the 3-D data available for this assessment did not cover block KC 875 and the corresponding stratigraphic unit is unknown.

Results

No seafloor hazards or constraints are defined by the available data at the proposed location. The top of a buried fault occurs in the near surface about 250 ft to the southeast. The fault is projected to cross the bore hole path at around 350 ft bml. The proposed wellsite is expected to intersect an additional buried fault at 1,665 ft bml. Additional undifferentiated faults probably exist within the suprasalt stratigraphy. Loss of circulation may occur across the fault planes. There is a negligible to low potential for encountering shallow gas or shallow water flow within the sediments above salt.

The data show no indications of hard grounds or substrates that could support high density benthic communities within 2000 ft of the proposed wellsite. There are no archaeological avoidances or known shipwrecks near the proposed surface location. If any wood, ceramics, textiles or ferrous objects become exposed during the course of bottom disturbing operations, all activities must be halted and BOEM/BSEE be notified within 48 hours.

Closing

We appreciate the opportunity to be of service to LLOG and look forward to working together on future projects.

Sincerely,

GEOSCIENCE EARTH & MARINE SERVICES



Thomas W. Neurauter, PhD., P.G.
Snr. Geoscientist



Daniel Lanier
Senior Principal



Erin Janes
Project Manager/Snr. Geoscientist

Attachments (5 Maps and 3 Illustrations)

Distribution:

Mr. Jaime Mata, LLOG Exploration Offshore, LLC, Houston, TX (Digital Copy)

REFERENCES

Bureau of Ocean Energy Management (BOEM), 2020, Notice to lessees and operators of federal oil, gas, and sulphur leases and pipeline right-of-way holders in the outer continental shelf, Gulf of Mexico OCS region, Archaeological resource surveys and reports: U. S. Department of the Interior, Minerals Management Service, Gulf of Mexico, NTL 2005-G07. NTL re-issued by BOEM in 2020.

Bureau of Ocean Energy Management (BOEM) 2022, Notice to lessees and operators of federal oil, gas, and sulphur leases in the outer continental shelf, Gulf of Mexico region, Shallow Hazards Program, NTL 2022-G01. Effective Date October 1, 2022.

Bureau of Ocean Energy Management (BOEM), 2023a, ASCII Data Files, published on the BOEM Gulf of Mexico Region Homepage, <https://www.data.boem.gov/Main/Default.aspx>.

Bureau of Ocean Energy Management (BOEM), 2023b, Seismic water bottom anomalies map gallery, published on the BOEM Gulf of Mexico Region web page, <http://www.boem.gov/Oil-and-Gas-Energy-Program/Mapping-and-Data/Map-Gallery/Seismic-Water-Bottom-Anomalies-Map-Gallery.aspx>.

Bureau of Ocean Energy Management (BOEM), 2023c, Safety performance review – shallow waterflows can pose significant hazards to deepwater drilling, published on the BOEM Gulf of Mexico Region Homepage, <http://www.boem.gov/Oil-and-Gas-Energy-Program/Resource-Evaluation/Geological-and-Geophysical-Reviews/Reviews-Gulf-of-Mexico.aspx>

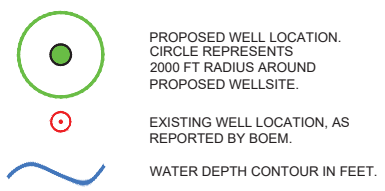
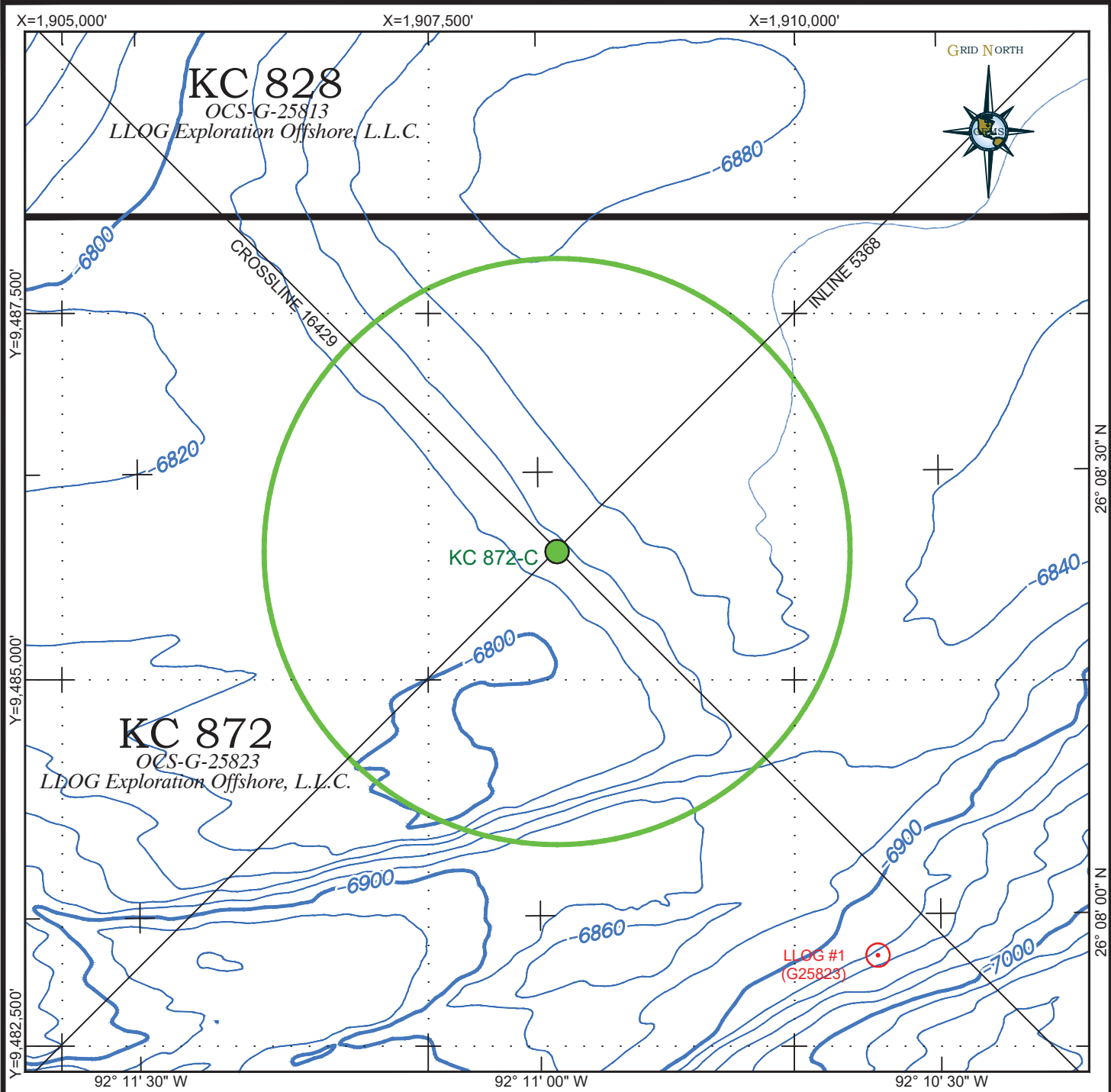
Coffeen, J. A., 1978, Seismic Exploration Fundamentals: Tulsa, the Petroleum Publishing Co., p. 125.

Geoscience Earth and Marine Services, (GEMS), 2019, Shallow hazards and archaeological assessment, Blocks 871 and 872, Keathley Canyon Area, Gulf of Mexico. Report prepared for LLOG Exploration Offshore, LLC, Project No. 0219-2831.

Minerals Management Service (MMS), 2008, Notice to lessees and operators of federal oil, gas, and sulphur leases and pipeline right-of-way holders in the outer continental shelf, Gulf of Mexico OCS region, information requirements for exploration plans and

development operations coordination documents: U. S. Department of the Interior, Minerals Management Service, Gulf of Mexico, NTL 2008-G04.

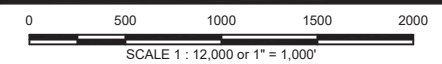
Minerals Management Service (MMS), 2010, Notice to lessees and operators of federal oil and gas leases in the outer continental shelf, Gulf of Mexico OCS region, deepwater benthic communities: U. S. Department of the Interior, Minerals Management Service, Gulf of Mexico, NTL 2009-G40. Effective Date January 27, 2010.



LLOG Exploration Offshore, LLC.

BATHYMETRY MAP

**BLOCK 872
KEATHLEY CANYON AREA
GULF OF MEXICO**

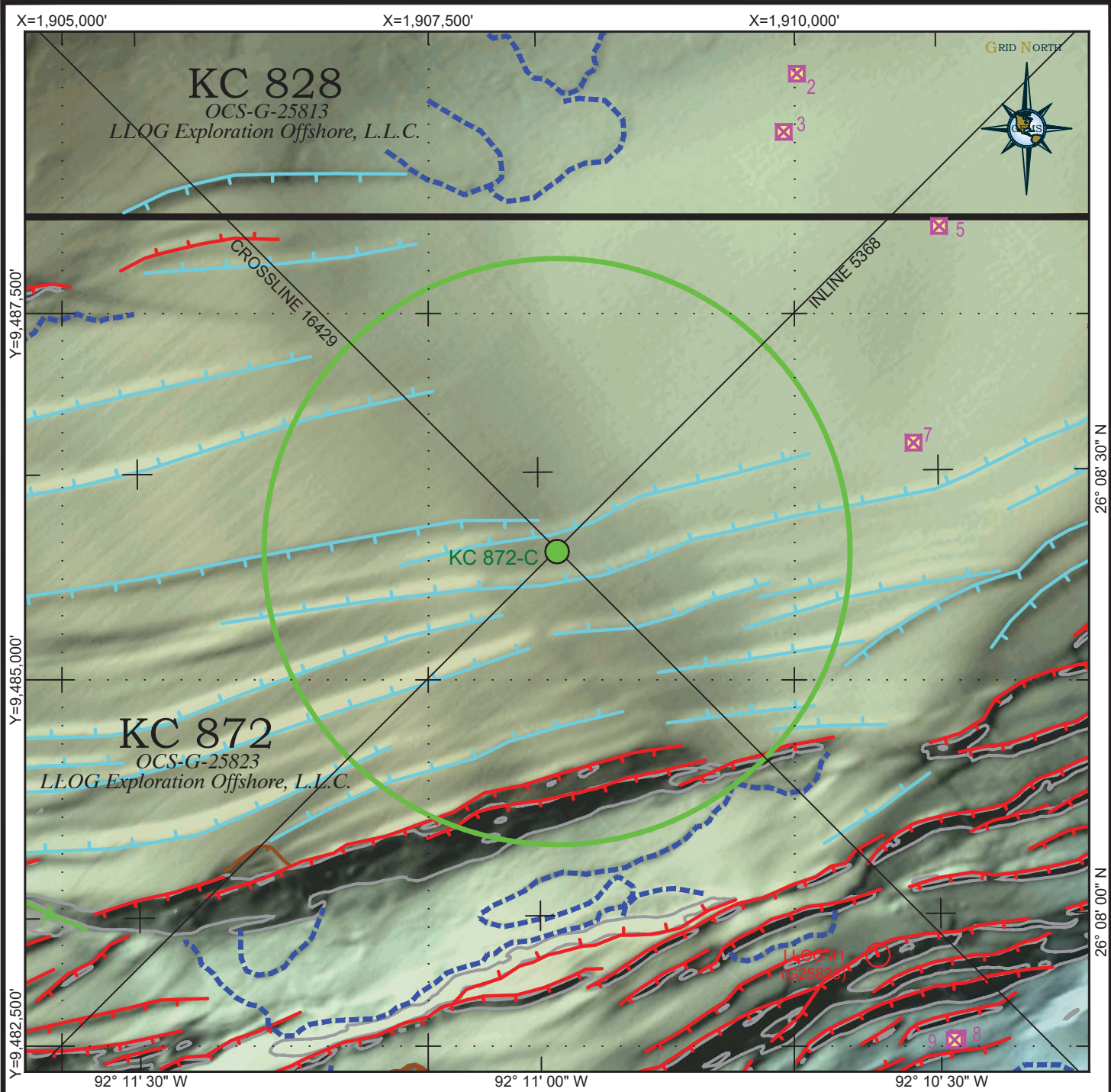











GEODETIC DATUM: NAD 1927
 ELLIPSOID: CLARKE 1866
 PROJECTION: UTM
 ZONE: 15 NORTH
 GRID UNITS: US FEET



DATE: 13 JUNE 2023
 FILE NAME: 3156_WELL_C_REV.DWG
 PROJECT NO.: 0123-3156

MAP NO. KC 872-C-1



-  PROPOSED WELL LOCATION. CIRCLE REPRESENTS 2000 FT RADIUS AROUND PROPOSED WELLSITE.
-  EXISTING WELL LOCATION, AS REPORTED BY BOEM.
-  SIDE-SCAN SONAR CONTACT (GEMS, 2019).
-  SEAFLOOR SLOPES GREATER THAN 10 DEGREES.
-  SEAFLOOR FAULTS. TICKS INDICATE DOWNTHROWN SIDE OF FAULT.
-  SHALLOW BURIED FAULTS WITH SEAFLOOR EXPRESSION MAPPED FROM SUBBOTTOM PROFILER DATA. TICKS INDICATE DOWNTHROWN SIDE OF FAULT.
-  SEAFLOOR EXPRESSION OF BURIED EROSIONAL/FAILURE SCARPS.
-  SEAFLOOR EXPRESSION OF BURIED GULLY. ARROWS INDICATE FLOW DIRECTION.
-  SEAFLOOR EXPRESSION OF BURIED MASS-TRANSPORT DEPOSITS (SLUMPS AND DEBRIS FLOW DEPOSITS).

GEODETIC DATUM: NAD 1927
 ELLIPSOID: CLARKE 1866
 PROJECTION: UTM
 ZONE: 15 NORTH
 GRID UNITS: US FEET



AZIMUTH = 300°
 ELEVATION = 15°
 V.E. = 3.0x

LLOG Exploration Offshore, LLC.

SEAFLOOR FEATURES MAP
BLOCK 872
KEATHLEY CANYON AREA
GULF OF MEXICO

0 500 1000 1500 2000
 SCALE 1 : 12,000 or 1" = 1,000'



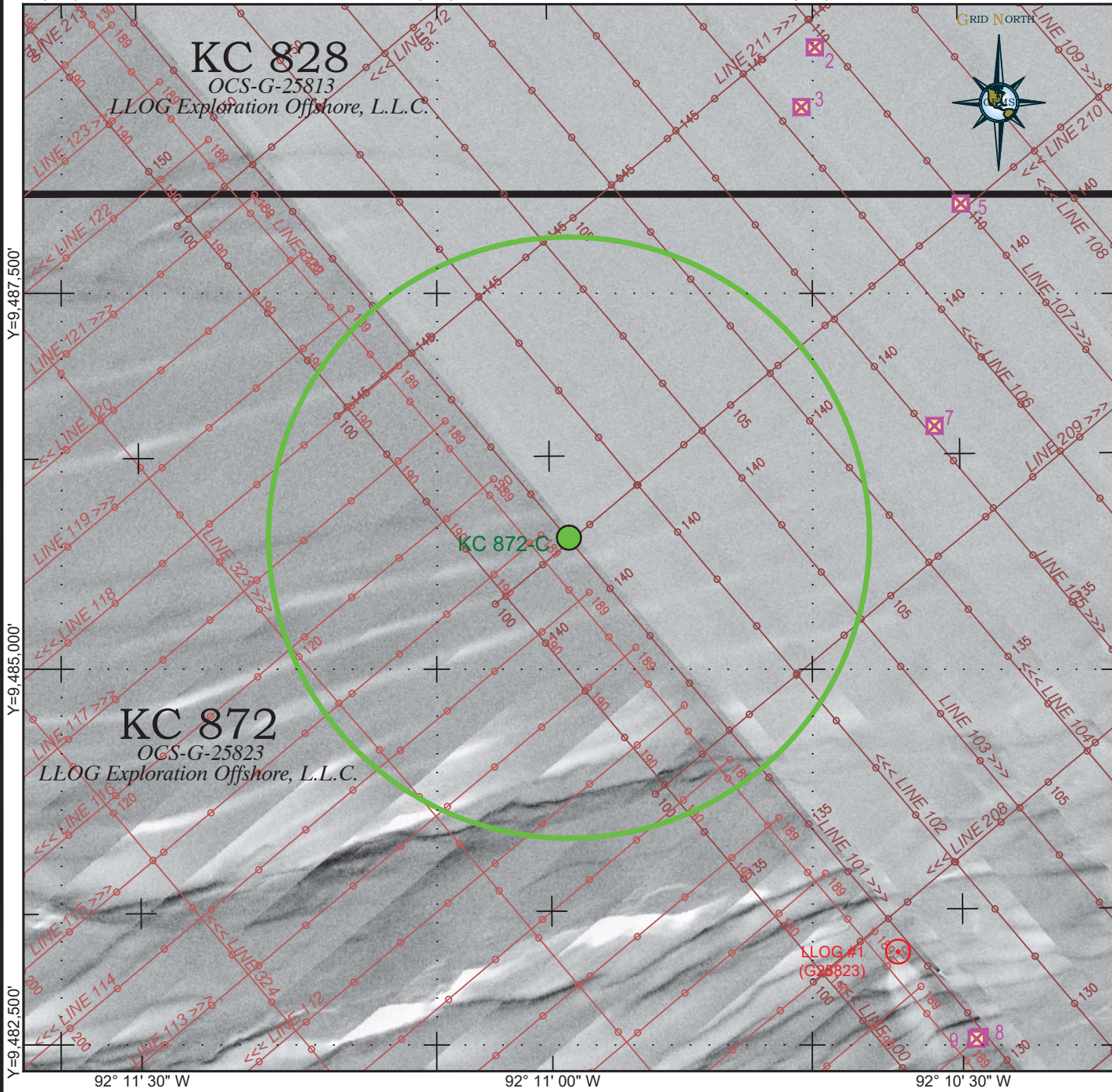
DATE: 13 JUNE 2023
 FILE NAME: 3156_WELL_C_REV.DWG
 PROJECT NO.: 0123-3156

MAP NO. KC 872-C-2

X=1,905,000'

X=1,907,500'

X=1,910,000'



Y=9,487,500

Y=9,485,000

Y=9,482,500





26° 08' 30" N

26° 08' 00" N

92° 11' 30" W

92° 11' 00" W

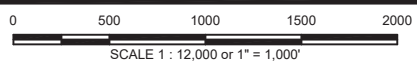
92° 10' 30" W

-  AUV SURVEY LINE.
-  PROPOSED WELL LOCATION.
CIRCLE REPRESENTS
2000 FT RADIUS AROUND
PROPOSED WELLSITE.
-  EXISTING WELL LOCATION, AS
REPORTED BY BOEM.
-  SIDE-SCAN SONAR CONTACT (GEMS, 2019).

LLOG Exploration Offshore, LLC.

SIDE-SCAN SONAR MOSAIC

BLOCK 872
KEATHLEY CANYON AREA
GULF OF MEXICO

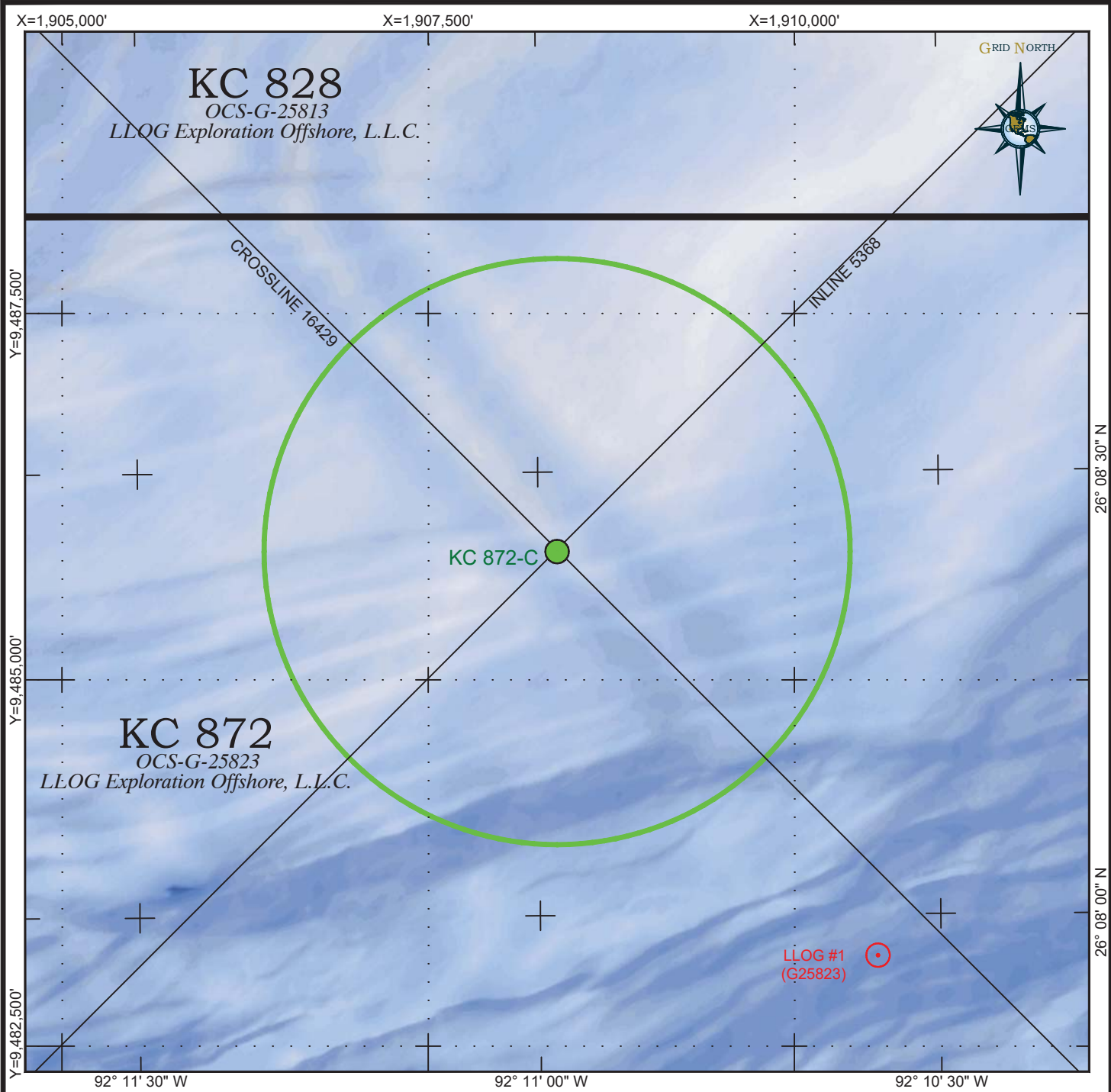


GEODETTIC DATUM: NAD 1927
 ELLIPSOID: CLARKE 1866
 PROJECTION: UTM
 ZONE: 15 NORTH
 GRID UNITS: US FEET



DATE: 13 JUNE 2023
 FILE NAME: 3156_WELL_C_REV.DWG
 PROJECT NO.: 0123-3156

MAP NO. KC 872-C-3



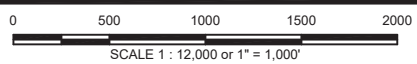
PROPOSED WELL LOCATION.
CIRCLE REPRESENTS
2000 FT RADIUS AROUND
PROPOSED WELLSITE.



EXISTING WELL LOCATION, AS
REPORTED BY BOEM.

LLOG Exploration Offshore, LLC.

SEAFLOOR AMPLITUDE
RENDERING
BLOCK 872
KEATHLEY CANYON AREA
GULF OF MEXICO



GEODETIC DATUM: NAD 1927
ELLIPSOID: CLARKE 1866
PROJECTION: UTM
ZONE: 15 NORTH
GRID UNITS: US FEET

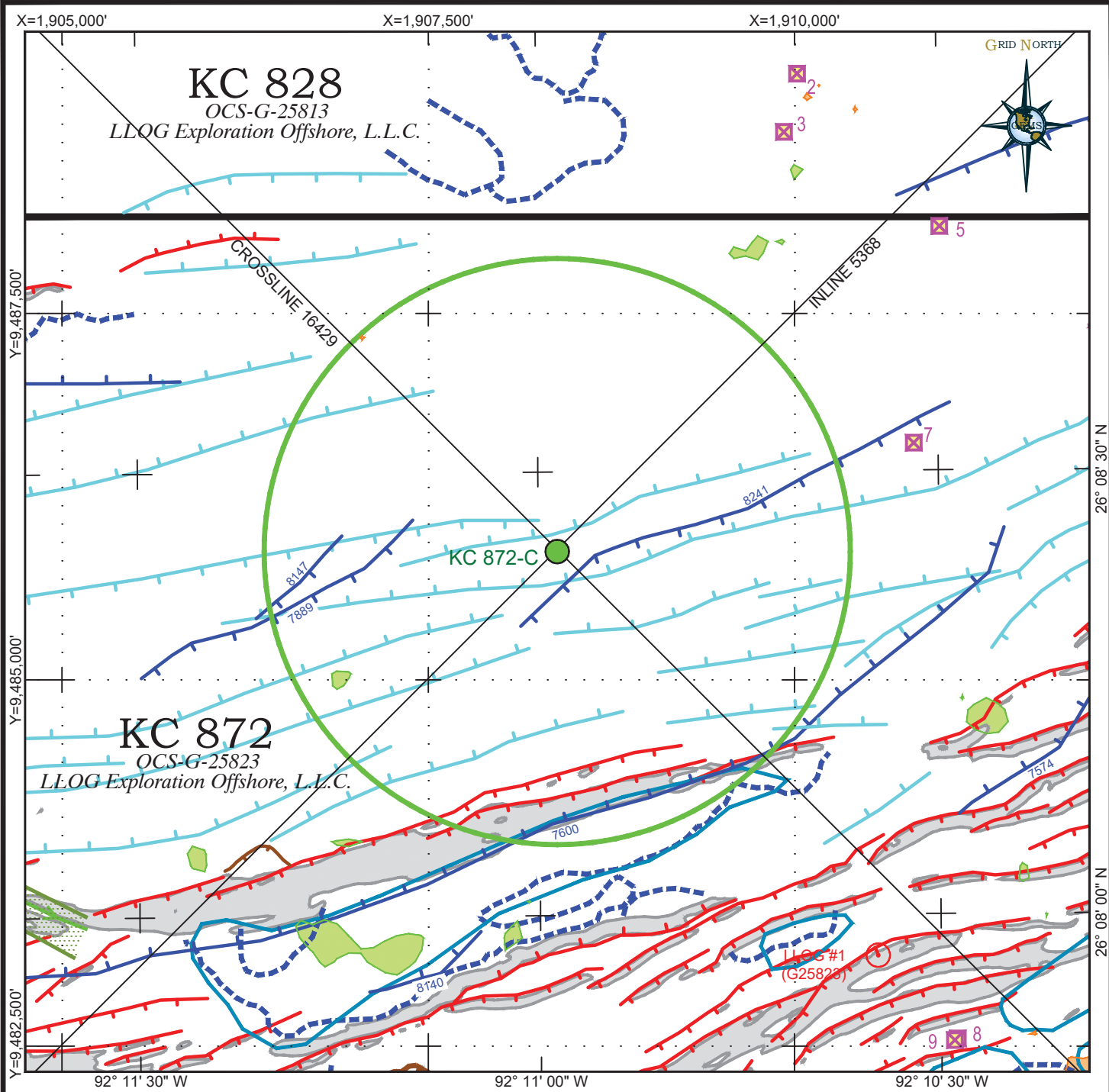















AZIMUTH = 300°
ELEVATION = 15°
V.E. = 4.0x



DATE: 13 JUNE 2023
FILE NAME: 3156_WELL_C_REV.DWG
PROJECT NO.: 0123-3156

MAP NO. KC 872-C-4



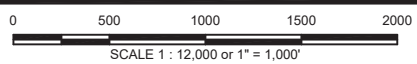
-  CIRCLE REPRESENTS 2000 FT RADIUS AROUND PROPOSED WELLSITE.
-  EXISTING WELL LOCATION, AS REPORTED BY BOEM.
-  SIDE-SCAN SONAR CONTACT (GEMS, 2019).
-  SEAFLOOR SLOPES GREATER THAN 10 DEGREES.
-  SHALLOW BURIED SLUMPS DEPOSITED IN THE HOLOCENE.
-  SEAFLOOR FAULTS. TICKS INDICATE DOWNTHROWN SIDE OF FAULT.
-  SHALLOW BURIED FAULTS WITH SEAFLOOR EXPRESSION MAPPED FROM SUBBOTTOM PROFILER DATA. TICKS INDICATE DOWNTHROWN SIDE OF FAULT.
-  TOP OF BURIED FAULTS MAPPED IN 3-D SEISMIC DATA. TICKS INDICATE DOWNTHROWN SIDE OF FAULT. NUMBER INDICATES SPOT DEPTH (BSL) TO TOP OF FAULT.
-  SEAFLOOR EXPRESSION OF BURIED GULLY. ARROWS INDICATE FLOW DIRECTION.
-  SEAFLOOR EXPRESSION OF BURIED MASS-TRANSPORT DEPOSITS (SLUMPS AND DEBRIS FLOW DEPOSITS).
-  BURIED ESCARPMENT, EDGE OF POSSIBLE CHANNEL OR SLUMP ZONE. TOP OF ESCARPMENT ~650 FT BML.
- AMPLITUDE ANOMALIES (3-D SEISMIC)**
-  AMPLITUDE ANOMALIES BETWEEN SEAFLOOR AND HORIZON 10 (UNIT 1).
-  AMPLITUDE ANOMALIES BETWEEN SEAFLOOR AND TOP OF SALT MINUS 200 FT (UNITS 2 AND 3).

GEODETIC DATUM: NAD 1927
 ELLIPSOID: CLARKE 1866
 PROJECTION: UTM
 ZONE: 15 NORTH
 GRID UNITS: US FEET

LLOG Exploration Offshore, LLC.

GEOLOGIC FEATURES MAP

BLOCK 872
KEATHLEY CANYON AREA
GULF OF MEXICO



DATE: 13 JUNE 2023
 FILE NAME: 3156_WELL_C_REV.DWG
 PROJECT NO.: 0123-3156

MAP NO. KC 872-C-5

Stratigraphic Column

Attachment C-6 (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 (c), 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:** Provide a brief description of the technology and reservoir engineering practices and procedures you will use to increase the ultimate recovery of oil and gas (e.g., secondary tertiary, or other enhanced recovery practices). If enhanced recovery practices are not going to be used initially, provide an explanation of the methods you considered and the reasons why you are not using them.

The Buckskin initial development was designed for future growth and additional wells to capture the full reserve potential of the field beyond the initial Phase 1 two-well development. The proposed wells, KC 828 #1 and KC 829 #5 are leveraging the existing subsea infrastructure on KC 785 and KC 829 while expanding the Buckskin development footprint down to the Southern High in KC 872 to increase the ultimate recovery of the field. The KC 828 #1 well is expected to spud in June 2024 while the KC 829 #5 well will spud in 2025.

The subsea infrastructure has been designed to accommodate additional wells and includes:

- One subsea manifold at the Drill Center in the eastern area of Keathley Canyon Block 829 with capacity for four wells and a removable pigging loop
- One subsea manifold on the southern portion of KC 785 that ties into the KC 829 manifold
- One subsea manifold on KC 872 with an inline sled on the western portion of KC 829 to accommodate the KC 829 #5 well
- Two 8” flowlines and subsea risers with riser base gas lift
- One production umbilical and one gas lift umbilical
- Two subsea control system tie-ins at the topsides umbilical termination assembly (TUTA)

The proposed wells would be the first wells produced the KC 872 subsea infrastructure. The location of the KC 828 #1 development well provides a take point for the Southern High and in the case of KC 829 #5, the well provides access to the downdip portion of the Central Fault Block which cannot be drilled from the existing drill centers.

All future wells will have access to the riser base gas lift system which is currently not expected to be initiated until late 2020 or early 2021. The purpose of the riser base gas lift is to reduce the flowing tubing pressure and increase the expected ultimate

recovery. KC 828 #1 and KC 829 #5 will be frac packed to reduce the initial skin and increase the well productivity.

A Buckskin CMG reservoir simulation model was integrated with PETEX (Prosper and Gap) to generate production profiles representing a range of recoverable resources. The reservoir simulation model is used to optimize well placement and well count and validated the incremental reserve recovery using riser base gas lift.

The third-party host facility is the Lucius Spar which currently does not have power available for subsea multiphase pumping but this will be evaluated in later stages of development. The partner group has elected to eliminate future water injection as a result of all the exploration and appraisal wells testing different fault blocks and the potential for additional compartmentalization.

B. Technology and Recovery Practices and Procedures. Provide a brief description of the technology and recovery practices and procedures you may use to ensure optimum recovery of oil and gas.

The Buckskin development and completion basis of design includes commingling the Upper Wilcox reservoirs. Commingling the Upper Wilcox sands accelerates production, significantly increases reserves and reduces the potential of uneconomic initial production rates. The Upper Wilcox reservoir is subdivided into 5 reservoirs, the Upper Wilcox 1-5. The gross interval of the Upper Wilcox 1-4 reservoirs is approximately 900' TVT based on the appraisal and development well results. The primary analogs for KC 828 #1 is KC 872 #1, KC 872 #1 BP01, and KC 872 #2 since these are the only wells drilled on the Southern High. The KC 872 #1 BP01 collected more than 900 ft of conventional core which has been used to refine petrophysical analysis, production and reserve expectations for the Southern High. The conventional core data will also be used to optimize the completion and frac design.

LLOG's technical limit for the maximum gross completion interval length is approximately 300' per zone, which is not long enough to complete the entire Upper Wilcox and Lower Wilcox hydrocarbon interval. The Buckskin field has completed KC 829 #2 ST01 using five zones and would consider adding additional zones if necessary for the KC 828 #1 completion. The completions will have downhole pressure and temperature measurement to monitor the reservoir pressure, annulus pressure and temperature.

The KC 872 subsea manifold and pipeline will tie into the KC 785 and KC 829 subsea infrastructure which is equipped with riser gas lift. The riser gas lift rates have varied depending on Lucius production and capacity constrains however Buckskin has typically been able to utilize between 3 and 6 MMCFD of riser gas lift. This volume is optimized between the flow lines and has provided an additional 1,500 – 2,000 BOPD but also reduces the bottomhole flowing pressure and will

increase the ultimate recovery of all Buckskin wells.

C. Reservoir Development – Provide a brief description of your exploratory well results, other relevant data, proposed well spacing, completion methods, and other relevant well plan information.

The Buckskin Field is a Lower Tertiary Field discovered in 2008 and consists of a large four-way salt-cored anticline that sits below and near the outer edge of the allochthonous salt canopy. The field has been subdivided into a Northern High and Southern High, separated by a small syncline. During the exploration and appraisal phase, four wells were drilled to the reservoir section with the discovery well drilling into the Southern High structure and the three appraisal wells drilled into the Northern High structure. The depth of the reservoir ranges from approximately -27,500 ft TVDSS on the flanks to approximately -25,000 ft TVDSS at the crest. Pressure and fluid data from the wells indicate the field is sub-divided into at least four separate fault blocks. Faulting is seismically imaged on both the northwestern and southeastern flanks of the field; separating the fault block penetrated by KC 829 #1 OH from two additional fault blocks drilled by KC 785 #1 and KC 829 #1STK. A fault is also mapped just southwest of KC 829 #1 OH separating this well from KC 872 #1.

There are currently three Buckskin producers, two in the Central Fault Block and one in the East Fault Block. The majority of the production to date has been from the Central Fault Block with more than 50 MMBO as of May 2024 in this fault block. Additional development wells from the KC 872 subsea manifold and KC 829 in-line sled are also targeting the Southern High as well as the Central Fault Blocks reserves downdip of the current producers and KC 829 #4 BP01.

The KC 828 #1 will be the initial development well for the Buckskin Southern High. The KC 828 #1 well is targeting both Upper Wilcox and Lower Wilcox reserves. The well design is a build and hold of sixty degrees through the targets to maximize the reservoir length due to the low permeability. The large gross thickness of the reservoirs will allow for the Upper Wilcox to be perforated on KC 872 and the Lower Wilcox will be perforated on KC 828. Additional wells on the Southern High are expected due to the low permeability. A four slot subsea manifold is being installed to accommodate future Southern High development wells.

The KC 829 #5 will be the fourth producer in the Central Fault Block which has more than 1 BBO OOIP. Production from the Central Fault Block indicates the reservoir is depletion drive or has a very weak aquifer and therefore an additional downdip well provides incremental recovery. The KC 829 #4 BP01 well confirmed lateral reservoir connectivity to the other producers in the fault block, KC 829 #2 ST01 and KC 829 #3 BP01, with similar reservoir quality. The completion intervals for KC 829 #5 can be optimized to ensure reservoir layers with less reservoir depletion than are not

effectively being drained from the other Central Fault Block producers can be completed.

The Buckskin well completion design is a cased hole, three zone frac packed completion. All the Upper Wilcox zones will be commingled similar to the initial production wells. The additional wells detailed in this plan are required to efficiently recover to hydrocarbons volumes in place or access fault blocks that do not currently have a producing wellbore.

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

<i>Origination Point</i>	<i>Flow Rates</i>	<i>Shut In Time</i>
KC 828 Well 001	2,000 MCFD 8,000 BOPD	< 20 Minutes
KC 829 Well 005	2,300 MCFD 10,000 BOPD	< 20 Minutes

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

A. High-Density Deepwater Benthic Communities Information

BOEM and BSEE have not reported the existence of high-density deepwater benthic communities within KC 828 or KC 872 (MMS, 2010). There are no BOEM water bottom anomalies within 2,000' radius of the proposed surface location (BOEM, 2023b).

There are no apparent geophysical indicators and/or geologic features at the seafloor or within the subbottom profiler record that would suggest conditions capable of supporting high-density deepwater benthic communities at the proposed wellsite or within the 2,000' radius (Maps KC 872 C-2 through C-4).

B. Topographic Features Map

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

C. Topographic Features Statement (Shunting)

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

D. Live Bottoms (Pinnacle Trend) Map

Keathley Canyon Block 872 is not located within the vicinity of a proposed live bottom (Pinnacle trend) area.

E. Live Bottoms (Low Relief) Map

Keathley Canyon Block 872 is not located within the vicinity of a proposed live bottom (Low Relief) area.

F. Potentially Sensitive Biological Features Map

Keathley Canyon Block 872 is not located within the vicinity of a proposed sensitive biological feature area.

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

Proposed activities in Keathley Canyon Block 872 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 KC 872, 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-I* for a list of the NOAA Species known in the Gulf of Mexico. 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"

H. Archaeological Report

An Archaeological Investigation for Block 871 and Block 872, Keathley Canyon Area was prepared by Echo Offshore, LLC for Chevron USA, Inc. dated 2011 & 2013 which was submitted to BOEM by separate letter.

A Shallow Hazards and Archaeological Assessment for Block 829, Keathley Canyon Area, Gulf of Mexico was prepared by Geoscience Earth & Marine Services (GEMS) dated May 22, 2017 and filed with BOEM under separate cover.

I. Air and Water Quality Information

Not applicable to proposed operations.

J. Socioeconomic Information

Not applicable to proposed operations.

NOAA Species Known in GOM

Attachment F-1 (Public Information)

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

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 Wastes

TABLE 1. Wastes you will generate, treat and downhole dispose or discharge to the GOM

TABLE 2. Wastes you will transport and /or dispose of onshore

B. Modeling

Not applicable. Proposed activities will be covered by U.S. EPA NPDES General Permit.

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

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

Projected generated waste			Projected ocean discharges		Downhole Disposal
Type of Waste	Composition	Projected Amount	Discharge rate	Discharge Method	Answer yes or no
Will drilling occur? If yes, fill in the muds and cuttings.					
<i>EXAMPLE: Cuttings wetted with synthetic based fluid</i>	<i>Cuttings generated while using synthetic based drilling fluid.</i>	<i>X bbl/well</i>	<i>X bbl/day/well</i>	<i>discharge overboard</i>	<i>No</i>
Water-based drilling fluid	Water based mud additives, barite and gel used for WBM	149,655 bbls/well	8,277 bbls/day/well	Discharge overboard	No
Cuttings wetted with water-based fluid	Cuttings generated while using water based drilling fluid.	6,521 bbls/well	361 bbls/day/well	Discharge overboard	No
Cuttings wetted with synthetic-based fluid	Cuttings generated while using synthetic based drilling fluid.	6,836 bbls/well	123 bbls/day/well	Discharge overboard	No
Will humans be there? If yes, expect conventional waste					
<i>EXAMPLE: Sanitary waste water</i>	Sanitary waste from living quarters	X bbl/well	X bbl/hr/well	chlorinate and discharge overboard	No
Domestic waste	Misc waste for living quarters	26,711 bbls/well	3.9 bbls/hr/well	Discharge overboard (no free oil)	No
Sanitary waste	Processed sanitary waste from living quarters	17,807 bbls/well	2.6 bbls/hr/well	Chlorinate and discharge overboard per USCG approved MSD	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 - chemical product waste	Ethylene glycol, methonal	300 bbls/well	20 bbls/hr/well	Transported to shore on vessels in DOT approved containers to Fourchon base for pick-up	No
Well completion fluids	Brines: NaCl, KCl, CaBr2, CaCl2, spent acids (hydrofluoric and hydrochloric), prop sand, debris from potential flowback operations	500 bbls/well	100 bbls/hr/well	Non-pollutant brines - tested for oil and grease for discharge overboard. This excludes clear brines containing Zinc, spent acids, prop sand and debris. These will be transported to shore on vessels in DOT approved containers to Fourchon base and on to Newpark Base for disposal.	No
Workover fluids	Brines: NaCl, KCl, CaBr2, CaCl2, spent acids (hydrofluoric and hydrochloric), prop sand, debris from potential flowback operations	500 bbls/well	100 bbls/hr/well	Non-pollutant brines - tested for oil and grease for discharge overboard. This excludes clear brines containing Zinc, spent acids, prop sand and debris. These will be transported to shore on vessels in DOT approved containers to Fourchon base and on to Newpark Base for disposal.	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	Stack Magic 200/0/5% glycol based on 2% mixture with potable water	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	Uncontaminated freshwater and seawater overflow / leakage accumulated from machinery operations	200 bbls/well	0 to 2 bbls/hr/well	Discharge overboard	No
Excess cement at seafloor	Excess cement slurry and mixwater used for cementing operation - NPDES allowed	1000 bbls/well	360 bbls/hr/well	Discharge at mudline	No
Fire water	Uncontaminated seawater used for fire control system - no additives	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	0 to 1600 bbls/hr/well	Discharge overboard	No
Will you produce hydrocarbons? If yes fill in for produced water.					
Produced water	NA	NA	NA	NA	No
Will you be covered by an individual or general NPDES permit ?			General NPDES		
NOTE: If you will not have a type of waste, enter NA in the row.			Comply with the requirements of the NPDES permit.		

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

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

Type of Waste	Projected generated waste	Solid and Liquid Wastes Transportation	Waste Disposal		
	Composition	Transport Method	Name/Location of Facility	Amount	Disposal Method
			Newport Environmental Services Inc., Ingleside, TX	X bbl/well	Recycled
Oil-based drilling fluid or mud	Inverted diesel based mud	NA	Newpark Transfer Station, Fourchon, LA	NA	NA
Synthetic-based drilling fluid or mud	Internal oilfin, ester nbased mud	Barged in 25 bbls cutting boxes and / or liquid mud tanks for supply vessels	Newpark Transfer Station, Fourchon, LA	6750 bbls / well	Recycled
Cuttings wetted with Water-based fluid	Drill cuttings wetted with WBM generated while drilling	NA	Newpark Transfer Station, Fourchon, LA	NA	NA
Cuttings wetted with Synthetic-based fluid	Drill cuttings wetted with SBM generated while drilling.	NA	Newpark Transfer Station, Fourchon, LA	NA	NA
Cuttings wetted with oil-based fluids	Drill cuttings wetted with inverted diesel based mud	NA	Newpark Transfer Station, Fourchon, LA	NA	NA
Will you produce hydrocarbons? If yes fill in for produced sand.					
Produced sand					
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 H ₂ S at concentrations greater than 20 parts per million (ppm)?		X
Do you propose to flare or vent natural gas in excess of the criteria set forth under 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

COMPANY	LLOG Exploration Offshore, LLC
AREA	Keathley Canyon
BLOCK	785 / 829 / 830 / 828 / 872
LEASE	OCS-G 25806, OCS-G 25814, OCS-G-25815, OCS-G-25813 and OCS-G-25823 Leases
FACILITY	
WELL	KC 829 SS002 ST01, KC 829 SS003 BP01, KC 830 #1 BP02, KC 785 #3, KC 829 004 BP01, KC 785 005, KC 828 001, KC 829 005 and alternates
COMPANY CONTACT	Sue Sachitana
TELEPHONE NO.	985-801-4300
REMARKS	Drill & Complete / Sidetrack / Future Workovers

Drillship

LEASE TERM PIPELINE CONSTRUCTION INFORMATION:		
YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS
2024		
2025	4	31
2026		23
2027		
2028		
2029		
2030		
2031		
2032		

AIR EMISSIONS CALCULATIONS

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELLS	
LLOG Exploration Offshore, LLC	Keathley Canyon	785 / 829 / 830	OCS-G 25806, 0		KC 829 SS002 ST01, KC 829 SS003 BP01, KC 830 #1 BP02, KC 785 #3, KC 829 004 BP01, KC 785 005, KC 828 001, KC 829 005 and alternates	

Year	Facility Emitted Substance								
	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3
2024	190.96	115.21	111.76	2.81	4579.19	133.51	0.01	735.40	1.34
2025	193.27	116.61	113.11	2.84	4634.52	135.10	0.01	744.07	1.35
2026	192.68	116.25	112.76	2.84	4620.24	134.69	0.01	741.83	1.35
2027	190.96	115.21	111.76	2.81	4579.19	133.51	0.01	735.40	1.34
2028	190.96	115.21	111.76	2.81	4579.19	133.51	0.01	735.40	1.34
2029	190.96	115.21	111.76	2.81	4579.19	133.51	0.01	735.40	1.34
2030	190.96	115.21	111.76	2.81	4579.19	133.51	0.01	735.40	1.34
2031	190.96	115.21	111.76	2.81	4579.19	133.51	0.01	735.40	1.34
2032	190.96	115.21	111.76	2.81	4579.19	133.51	0.01	735.40	1.34
2033	190.96	115.21	111.76	2.81	4579.19	133.51	0.01	735.40	1.34
Allowable	7359.30	0.00	0.00	7359.30	7359.30	7359.30		124281.68	

COMPANY	LLOG Exploration Offshore, LLC
AREA	Keathley Canyon
BLOCK	785/829/830
LEASE	OCS-G-25806, OCS-G 25814 & OCS-G-25815
FACILITY	N/A
WELL	KC 829 SS002 ST01, KC 829 SS003 BP01, KC 830 #1 BP02, KC 785 #3, KC 829 004 BP01, KC 785 005, KC 828 001, KC 829 005 and alternates
COMPANY CONTACT	Sue Sachitana
TELEPHONE NO.	985-801-4300
REMARKS	Drill & Complete / Sidetrack / Future Workovers DP Semi

LEASE TERM PIPELINE CONSTRUCTION INFORMATION:		
YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS
2024		
2025	4	31
2026		23
2027		
2028		
2029		
2030		
2031		
2032		

AIR EMISSIONS CALCULATIONS - 5TH YEAR

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL	CONTACT	PHONE	REMARKS																	
LLOG Exploration Offshore, LLC	Keathley Canyon	785/829/830	OCS-G-25806	N/A	KC 829 SS002 ST01, KC 829 SS003 BP01, KC 830 #1 BP02, KC 785 #3, KC 829 004 BP01, K	Sue Sachitana	985-801-4300	Drill & Complete / Sidetrack / Future Workovers																	
OPERATIONS	EQUIPMENT	EQUIPMENT ID	RATING	MAX. FUEL GAL/HR	ACT. FUEL GAL/D	RUN TIME HR/D D/YR	MAXIMUM POUNDS PER HOUR										ESTIMATED TONS								
	Diesel Engines		HP	SCF/HR	SCF/D		TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	
	Nat. Gas Engines		HP	SCF/HR	SCF/D																				
	Burners		MMBTU/HR	SCF/HR	SCF/D																				
DRILLING/WORKOVERS	VESSELS- Drilling - Propulsion Engine - Diesel		61200	3148.4952	75563.88	24 365	43.18	26.05	25.27	0.63	1034.45	29.74	0.00	162.25	0.30	189.11	114.09	110.67	2.75	4530.87	130.27	0.01	710.66	1.32	
DRILLSHIP	VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels - Diesel Boiler		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels - Drilling Prime Engine, Auxiliary		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIPELINE INSTALLATION	VESSELS - Pipeline Laying Vessel - Diesel		8800	452.7248	10865.40	24 31	6.21	3.75	3.63	0.09	148.74	4.28	0.00	23.33	0.04	2.31	1.39	1.35	0.03	55.33	1.59	0.00	8.68	0.02	
	VESSELS - Pipeline Burying - Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	VESSELS - Heavy Lift Vessel/Derrick Barge Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	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	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	0.00	0.00	0.00	--	0.00	--	
	VESSELS - Shuttle Tankers		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Well Stimulation		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Turbine		0	0	0.00	0 0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	Diesel Turbine		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	Dual Fuel Turbine		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 2 Cycle Lean Natural Gas		0	0	0.00	0 0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	RECIP. 4 Cycle Lean Natural Gas		0	0	0.00	0 0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	RECIP. 4 Cycle Rich Natural Gas		0	0	0.00	0 0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	Diesel Boiler		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Heater/Boiler/Burner		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MISC.		BPD	SCF/HR	COUNT																				
	STORAGE TANK				0	1 1	--	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	--
	COMBUSTION FLARE - no smoke				0	0 0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - light smoke				0	0 0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - medium smoke				0	0 0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - heavy smoke				0	0 0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COLD VENT				0	1 1	--	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	--
	FUGITIVES				0	0 0	--	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	--
	GLYCOL DEHYDRATOR				0	1 1	--	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	--
	WASTE INCINERATOR				0	0 0	--	--	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
DRILLING WELL TEST	Liquid Flaring		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	COMBUSTION FLARE - no smoke			162500		24 28	0.00	0.00	0.00	0.09	11.60	5.84	--	52.89	--	0.00	0.00	0.00	0.03	3.90	1.96	--	17.77	--	
	COMBUSTION FLARE - light smoke			0		0 0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - medium smoke			0		0 0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
	COMBUSTION FLARE - heavy smoke			0		0 0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--	
ALASKA-SPECIFIC SOURCES	VESSELS		kw			HR/D D/YR																			
	VESSELS - Ice Management Diesel		0			0 0	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	
	2025 Facility Total Emissions						49.38	29.79	28.90	0.81	1,194.79	39.86	0.00	238.47	0.35	191.42	115.49	112.02	2.82	4,590.10	133.82	0.01	737.11	1.34	
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES																								
	209.0																								
DRILLING	VESSELS- Crew Diesel		7200	370.4112	8889.87	12 156	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	4.77	2.88	2.79	0.07	114.22	3.28	0.00	17.92	0.03	
	VESSELS - Supply Diesel		7200	370.4112	8889.87	12 313	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	9.53	5.75	5.58	0.14	228.45	6.57	0.00	35.83	0.07	
	VESSELS - Tugs Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PIPELINE INSTALLATION	VESSELS - Support Diesel, Laying		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSELS - Support Diesel, Burying		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSELS - Crew Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSELS - Supply Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FACILITY INSTALLATION	VESSELS - Material Tug Diesel		0	0	0.00	0 0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	VESSELS - Crew Diesel		0	0	0.00	0 0	0.00	0.00	0.00																

AIR EMISSIONS CALCULATIONS - 8TH YEAR

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL	CONTACT	PHONE	REMARKS																	
LLOG Exploration Offshore, LLC	Keathley Canyon	785/829/830	OCS-G-25806	N/A	KC 829 SS002 ST01, KC 829 SS003 BP01, KC 830 #1 BP02, KC 785 #3, KC 829 004 BP01, K	Sue Sachitana	985-801-4300	Drill & Complete / Sidetrack / Future Workovers																	
OPERATIONS	EQUIPMENT	EQUIPMENT ID	RATING	MAX. FUEL	ACT. FUEL	RUN TIME	MAXIMUM POUNDS PER HOUR										ESTIMATED TONS								
	Diesel Engines		HP	GAL/HR	GAL/D		TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3	
	Nat. Gas Engines		HP	SCF/HR	SCF/D																				
	Burners		MMBTU/HR	SCF/HR	SCF/D	HR/D	D/YR																		
DRILLING/WORKOVERS	VESSELS- Drilling - Propulsion Engine - Diesel	2028	61200	3148.4952	75563.88	24	365	43.18	26.05	25.27	0.63	1034.45	29.74	0.00	162.25	0.30	189.11	114.09	110.67	2.75	4530.87	130.27	0.01	710.66	1.32
DRILLSHIP	VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS- Drilling - Propulsion Engine - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels - Diesel Boiler		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Vessels - Drilling Prime Engine, Auxiliary		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIPELINE INSTALLATION	VESSELS - Pipeline Laying Vessel - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Pipeline Burying - Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	VESSELS - Heavy Lift Vessel/Derrick Barge Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	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	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	0.00	0.00	0.00	--	0.00	--
	VESSELS - Shuttle Tankers		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Well Stimulation		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Turbine		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	Diesel Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	Dual Fuel Turbine		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP. 2 Cycle Lean Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	RECIP. 4 Cycle Lean Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	RECIP. 4 Cycle Rich Natural Gas		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	Diesel Boiler		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Natural Gas Heater/Boiler/Burner		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MISC.		BPD	SCF/HR	COUNT																				
	STORAGE TANK		0	0	0	1	1	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	
	COMBUSTION FLARE - no smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - light smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - medium smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - heavy smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COLD VENT		0	0	0	1	1	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	
	FUGITIVES		0	0	0	0	0	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	
	GLYCOL DEHYDRATOR		0	0	0	1	1	--	--	--	--	0.00	--	--	--	--	--	--	--	--	0.00	--	--	--	
	WASTE INCINERATOR		0	0	0.00	0	0	--	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
DRILLING WELL TEST	Liquid Flaring		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	COMBUSTION FLARE - no smoke		0	162500	0.00	24	28	0.00	0.00	0.00	0.09	11.60	5.84	--	52.89	--	0.00	0.00	0.00	0.03	3.90	1.96	--	17.77	--
	COMBUSTION FLARE - light smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - medium smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
	COMBUSTION FLARE - heavy smoke		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	--	--	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
ALASKA-SPECIFIC SOURCES	VESSELS		kw			HR/D	D/YR																		
	VESSELS - Ice Management Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	0.00
	2028 Facility Total Emissions							43.18	26.05	25.27	0.72	1,046.05	35.58	0.00	215.14	0.30	189.11	114.09	110.67	2.78	4,534.77	132.23	0.01	728.43	1.32
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES																								
	209.0																								
DRILLING	VESSELS- Crew Diesel		7200	370.4112	8889.87	12	156	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	4.77	2.88	2.79	0.07	114.22	3.28	0.00	17.92	0.03
	VESSELS - Supply Diesel		7200	370.4112	8889.87	12	313	5.08	3.06	2.97	0.07	121.70	3.50	0.00	19.09	0.04	9.53	5.75	5.58	0.14	228.45	6.57	0.00	35.83	0.07
	VESSELS - Tugs Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIPELINE INSTALLATION	VESSELS - Support Diesel, Laying		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Support Diesel, Burying		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Crew Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Supply Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	VESSELS - Material Tug Diesel		0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS - Crew Diesel		0	0	0.00																				

AIR EMISSIONS CALCULATIONS

COMPANY	AREA	BLOCK	LEASE	FACILITY	WELL				
LLOG Exploration Offshore, LLC	785/829/830	OCS-G-25806	N/A	KC 829 SS002 ST01, KC 829 SS003 BP01, KC 830 #1 BP02, KC 785 #3, KC 829					
Year	Facility Emitted Substance								
	TSP	PM10	PM2.5	SOx	NOx	VOC	Pb	CO	NH3
2024	189.11	114.09	110.67	2.78	4534.77	132.23	0.01	728.43	1.32
2025	191.42	115.49	112.02	2.82	4590.10	133.82	0.01	737.11	1.34
2026	190.82	115.13	111.67	2.81	4575.82	133.41	0.01	734.87	1.33
2027	189.11	114.09	110.67	2.78	4534.77	132.23	0.01	728.43	1.32
2028	189.11	114.09	110.67	2.78	4534.77	132.23	0.01	728.43	1.32
2029	189.11	114.09	110.67	2.78	4534.77	132.23	0.01	728.43	1.32
2030	189.11	114.09	110.67	2.78	4534.77	132.23	0.01	728.43	1.32
2031	189.11	114.09	110.67	2.78	4534.77	132.23	0.01	728.43	1.32
2032	189.11	114.09	110.67	2.78	4534.77	132.23	0.01	728.43	1.32
2033	189.11	114.09	110.67	2.78	4534.77	132.23	0.01	728.43	1.32
Allowable	7359.30	0.00	0.00	7359.30	7359.30	7359.30		124281.68	

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

A. Oil Spill Response Planning

All the proposed activities in this Supplemental Development Operations Coordination Document will be covered by the Oil Spill Response Plan filed by LLOG (No. 02058) in accordance with 30 CFR 254, our biennial update was found to be “in-compliance” on September 8, 2022. Our OSRP revision was approved on November 27, 2023.

The WCD proposed in this Plan does not exceed the WCD outlined in our OSRP.

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 MSC supervisor to operate the equipment.

D. Worst-Case Scenario Information

<i>Category</i>	<i>Regional OSRP</i>	<i>Drilling</i>
Type of Activity	Exploratory MODU	MODU
Facility Surface Location	Mississippi Canyon Block 386	Keathley Canyon Block 785
Facility Description	Well No. 001 (Rev “B” Location)	Well Location #3
Distance to Nearest Shoreline (Miles)	58 miles	209 miles
Volume: Storage Tanks (total) Facility Piping (total) Lease Term Pipeline Uncontrolled Blowout (day) Barging Potential 24 Hour Volume (bbls)	396,602 bbls	242,027 bbls
Type of Liquid Hydrocarbon	Crude	Crude Oil
API Gravity	25°	29.5°

<i>Category</i>	<i>Regional OSRP</i>	<i>Initial DOCD</i>
Type of Activity	Development Production >10 miles from shore	Development Production >10 miles from shore
Facility Surface Location	Keathley Canyon	Keathley Canyon Block 785/829
Facility Description	Platform “A”	Well SS003
Distance to Nearest Shoreline (Miles)	224 miles	209 miles
Volume: Storage Tanks (total) Facility Piping (total) Lease Term Pipeline Uncontrolled Blowout (day) Barging Potential 24 Hour Volume (bbls)	2097 bbls 327 bbls 15 bbls 45,260 bbls 47,699 bbls	0 0 1442 bbls/day 5351 bbls/day 6793 bbls/day
Type of Liquid Hydrocarbon	Crude Oil	Crude Oil
API Gravity	32.1°	31°

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, our biennial update was found to be “in-compliance” on September 8, 2022. Our OSRP revision was approved on November 27, 2023.

Since 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 (Operator No.02058) in accordance with 30 CFR 254 Biennial update modification approved on August 16, 2018 and revisions approved December 22, 2021 and since the worst case discharge determined in this Initial Development Operations Coordination Document for Keathley Canyon Block 785 does not exceed the worst case discharge outlined 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 this Initial Development Operations Coordination Document.

LLOG Exploration Offshore, L.L.C., Company No. 02058, accepts Chevron's previously submitted Exploration WCD volume reviewed in Plan S-7655, Supplemental Exploration Plan, which was approved on May 23, 2014.

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

E. Oil Spill Response Discussion

See the following Oil Spill Response Discussion.

SPILL RESPONSE DISCUSSION

For the purpose of NEPA and Coastal Zone Management Act analysis, the largest spill volume originating from the proposed activity would be a well blowout during drilling operations, estimated to be 122,081 barrels of crude oil with an API gravity of 28.1°.

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 2% probability of impact to the shorelines of Matagorda County, Texas; Galveston, Texas; and Cameron Parish, Louisiana within 30 days.

Matagorda County stretches from Matagorda Bay, across the Colorado River and up to the border of San Bernard Wildlife Refuge (immediately west of the San Bernard River). The county includes Matagorda Peninsula on the Gulf coast and Matagorda Bay. This area is primarily open beach. However, marshland exists along the east side of Matagorda Bay. Several bird rookeries are present around the peninsula. Seagrass is present off of Matagorda Peninsula on the bay side.

Galveston County includes the Gulf Beach from the west end of Galveston Island at Texas Highway 3005 to the east coast of High Island at the Jefferson County line. Habitats include marshes at the west end of Seawall Boulevard and on the east end of the island and open beaches and avian feeding areas all along the coastline, including a National Audubon Society Sanctuary. The waters of Galveston Bay are classified as an EPA National Estuary.

Cameron Parish includes the east side of Sabine Lake, Sabine National Wildlife Refuge, Calcasieu Lake, Lacassine National Wildlife Refuge (inland) and Grand Lake. Cameron Parish also includes the area along the coastline from Sabine Pass to Big Constance Lake in Rockefeller Wildlife Refuge. This region is composed of open public beaches, marshlands and swamps. It serves as a habitat for numerous birds, finfish and other animals, including several rare, threatened and endangered species.

Response

LLOG 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 33% or approximately 40,287 barrels of crude oil would be evaporated/dispersed within 24 hours, with approximately 81,794 barrels remaining.

Natural Weathering Data: KC 872, Location H	Barrels of Oil
WCD Volume	122,081
<i>Less 33% natural evaporation/dispersion</i>	40,287
Remaining volume	81,794

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'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 and MSRC's spill response equipment with a total derated skimming capacity of 1,034,121 barrels. Temporary storage associated with skimming equipment equals 160,547 barrels. If additional storage is needed, various tank barges with a total of 1,038,000+ barrels of storage capacity 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 Matagorda County, Texas; Galveston County, Texas; or Cameron Parish, Louisiana would depend upon existing environmental conditions. Shoreline protection would include the use of CGA's and MSRC's near shore and shallow water skimmers with a totaled derated skimming capacity of 257,401 barrels. Temporary storage associated with skimming equipment equals 6,975 barrels. If additional storage is needed, various tank barges with a total of 463,000+ barrels of storage capacity may be mobilized and centrally located to provide temporary storage and minimize off-loading time. Onshore response may include the deployment of shoreline boom on beach areas, or protection and sorbent boom on vegetated areas. A contract with OMI Environmental will ensure access to 113,700 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 the 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's contract Incident Management Team has access to the applicable ACP(s) and GRP(s).

Based on the anticipated worst case discharge scenario, LLOG 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 79 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:

- Safety
- 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 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 to complete a common objective, 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 Supervisor 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 offshore 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 offshore as safely possible

CGA FRUs

- To the area of the thickest oil
- Use as far offshore 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 offshore 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 tugboat 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'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 evaluate 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 aircraft 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 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 the 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 are 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-rigger 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

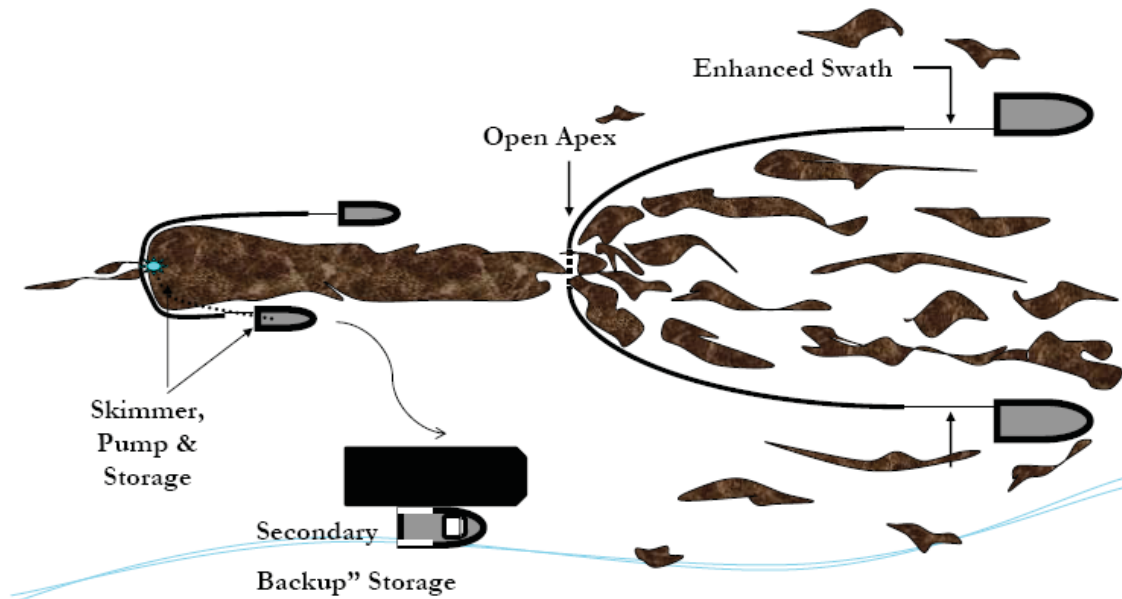
Mechanical Recovery – Deployed on large vessels of opportunity (VOO) the Koseq Rigid Sweeping Arms are high volume surge capacity deployed to increase recovery capacity at the source of a large oil spill in the offshore and outer nearshore environment of the Gulf of Mexico. They are highly mobile and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

VOO

- Use LLOG'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., landowners, 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

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 cleanup 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 roadways
- Discuss and gain approval prior 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

Prevailing winds, waves and currents along the Texas coast are from the southeast and northeast quadrants. Ten to 20 foot waves may occur during hurricanes. The combined effect of the winds, surface currents, and waves refracting shoreward produce the prevailing westerly longshore currents.

Tides are semi-diurnal and diurnal, and range in height from less than 1 foot to 2.5 feet. The direction, force, and duration of the wind has a considerable effect on the tides and currents. Fifteen foot tides may be expected during severe hurricanes and very low tides may accompany strong northerlies of long duration.

Surface water temperature averages slightly less than 90° F and ranges between 80 and 100° F during the late summer. During the winter, the average is slightly less than 60° F and the range is between 35 and 80° F.

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 every few years there may be a hurricane occurring "out of season" - primarily in May or December. Globally, September is the most active month and May is the least active month.

FIGURE 1
TRAJECTORY BY LAND SEGMENT

<p>Trajectory of a spill and the probability of it impacting a land segment have been projected utilizing LLOG'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.</p>				
Area/Block	OCS-G	Launch Area	Land Segment and/or Resource	Conditional Probability (%)
KC 872 KC 872, Well Location H <i>212 miles from shore</i>	G25823	W029	Kenedy, TX Kleberg, TX Aransas, TX Calhoun, TX Matagorda, TX Brazoria, TX Galveston, TX Jefferson, TX Cameron, LA Vermilion, LA	1 1 1 1 2 1 2 1 2 1

WCD Scenario – BASED ON WELL BLOWOUT DURING DRILLING OPERATIONS (212 miles from shore)

81,794 bbls of crude oil (Volume considering natural weathering)

API Gravity 28.1°

FIGURE 2 – Equipment Response Time to KC 872, Location H

<i>Dispersants/Surveillance</i>											
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	1.1	5.1				
DC3	1200	2	Houma	2	2	1.2	5.2				
DC3	1200	2	Houma	2	2	1.2	5.2				
Aero Commander	NA	2	Houma	2	2	.9	4.9				
MSRC											
737 – N735Z	4,125	3	Weyers Cave	2	0.5	4.6	7.1				
<i>Offshore Response</i>											
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	10	42	2	60
95' FRV	22885	249	NA	6	Leeville	2	0	2	11	1	16
95' FRV	22885	249	NA	6	Venice	2	0	2	13	1	18
95' FRV	22885	249	NA	6	Vermilion	2	0	2	11	1	16
Boom Barge (CGA-300) 42" Auto Boom (25000')	NA	NA	1 Tug 50 Crew	4 (Barge) 2 (Per Crew)	Leeville	8	0	4	42	2	56
Recovered Oil Storage 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
Enterprise Marine Services LLC (Available through contract with CGA)											
CTCo 2603	NA	25000	1 Tug	6	Amelia	9	0	6	32	1	48
CTCo 2604	NA	20000	1 Tug	6	Amelia	9	0	6	32	1	48
CTCo 2605	NA	20000	1 Tug	6	Amelia	9	0	6	32	1	48
CTCo 2606	NA	20000	1 Tug	6	Amelia	9	0	6	32	1	48
CTCo 2607	NA	23000	1 Tug	6	Amelia	9	0	6	32	1	48

Recovered Oil Storage 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
Kirby Offshore (available through contract with CGA)											
RO Barge	NA	80000+	1 Tug	6	Venice	19	0	4	36	1	60
RO Barge	NA	80000+	1 Tug	6	Venice	19	0	4	36	1	60
RO Barge	NA	80000+	1 Tug	6	Venice	19	0	4	36	1	60
RO Barge	NA	110000+	1 Tug	6	Venice	19	12	4	36	1	60
RO Barge	NA	130000+	1 Tug	6	Venice	19	12	4	36	1	60
RO Barge	NA	140000+	1 Tug	6	Venice	19	12	4	36	1	60
RO Barge	NA	150000+	1 Tug	6	Venice	19	0	4	36	1	60
RO Barge	NA	160000+	1 Tug	6	Venice	19	0	4	36	1	60

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
MSRC											
Louisiana Responder Transrec 350 + OSRV 2,640' 67" Curtain Pressure Boom	10567	4000	NA	11	Fort Jackson, LA	2	1	4	12	1	20
MSRC 401 Offshore Barge 1 Crucial Disk 88/30 1 Desmi Ocean 2,640' 67" Curtain Pressure Boom	11122 3017	40000	3 Tugs	9	Fort Jackson, LA	4	1	6	33	1	45
S.T. Benz Responder 1 LFF 100 Brush 2,640' 67" Curtain Pressure Boom	18086	4000	NA	11	Grand Isle, LA	3	1	1	11	1	17
Gulf Coast Responder Transrec 350 + OSRV 2,640' 67" Curtain Pressure Boom	10567	4000	NA	11	Lake Charles, LA	2	1	4	12	1	20

Texas Responder Transrec-350 + OSRV 2,640' 67" Curtain Pressure Boom	10567	4000	NA	11	Galveston, TX	2	1	1	12	1	17
MSRC 570 Offshore Barge 2 Crucial Disk 88/30 2,640' 67" Curtain Pressure Boom	22244	56900	3 Tugs	9	Galveston, TX	4	1	2	33	1	41

Staging Area: Cameron

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
T&T Marine (available through direct contract with CGA)											
Aqua Guard Triton RBS (1)	22323	2000	1 Utility	6	Galveston	4	12	5	24	2	47
Aqua Guard Triton RBS (1)	22323	2000	1 Utility	6	Harvey	4	12	7	21	2	46
Koseq Skimming Arms (10) Lamor brush	228850	10000	5 OSV	30	Galveston	24	24	5	24	2	79
Koseq Skimming Arms (6) MariFlex 150 HF	108978	6000	3 OSV	18	Galveston	24	24	5	24	2	79
Koseq Skimming Arms (2) Lamor brush	45770	2000	1 OSV	6	Harvey	24	24	7	21	2	78
Koseq Skimming Arms (4) MariFlex 150 HF	72652	4000	2 OSV	12	Harvey	24	24	7	21	2	78
CGA											
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Morgan City	2	5	4.5	21	1	33.5
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Vermilion	2	5	2.5	21	1	31.5
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Galveston	2	5	5	24	1	37
FRU (1) + 100 bbl Tank (2)	4251	200	1 Utility	6	Lake Charles	2	5	2	21	1	31
FRU (2) + 100 bbl Tank (4)	8502	400	2 Utility	12	Leeville	2	5	7	24	1	39
FRU (2) + 100 bbl Tank (4)	8502	400	2 Utility	12	Venice	2	5	9.5	24	1	41.5

Staging Area: Cameron

Offshore Equipment Preferred 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
MSRC											
Crucial Disk 88/30 Skimmer (1)	11122	1000	1 PSV	9	Galveston	1	2	5	24	1	33
Crucial Disk 88/30 Skimmer (1)	11122	1000	1 PSV	9	Galveston	1	2	5	24	1	33
GT-185 Skimmer w Adaptor (2)	2742	400	2 Utility	12	Galveston	1	2	5	24	1	33
Walosep 4 Skimmer (1)	3017	400	1 Utility	6	Galveston	1	2	5	24	1	33
Foilex 250 Skimmer (1)	3977	400	1 Utility	6	Galveston	1	2	5	24	1	33
Stress I Skimmer (1)	15840	400	1 Utility	6	Galveston	1	2	5	24	1	33
GT-185 Skimmer w Adaptor (1)	1371	400	1 Utility	6	Port Arthur	1	2	1.5	22	1	27.5
Desmi Skimmer (1)	3017	400	1 Utility	6	Lake Charles	1	2	1	21	1	26
Foilex 250 Skimmer (1)	3977	400	1 Utility	6	Lake Charles	1	2	1	21	1	26
GT-185 Skimmer w Adaptor (2)	2742	400	1 Utility	6	Lake Charles	1	2	1	21	1	26
Stress I Skimmer (1)	15812	800	2 Utility	12	Lake Charles	1	2	1	21	1	26
Stress I Skimmer (1)	15840	800	2 Utility	12	Lake Charles	1	2	1	21	1	26
Lamor LUF Brush Skimmer (1) <i>1,320' 67" Curtain Pressure Boom</i>	18086	400	1 PSV	14	Lake Charles	1	2	1	21	1	26
Lamor LUF Brush Skimmer (1) <i>1,320' 67" Curtain Pressure Boom</i>	18086	400	1 PSV	14	Lake Charles	1	2	1	21	1	26
Transrec 350 Skimmer (1) <i>1,320' 67" Curtain Pressure Boom</i>	10567	400	1 PSV	14	Lake Charles	1	2	1	21	1	26
Transrec 350 Skimmer (1) <i>1,320' 67" Curtain Pressure Boom</i>	10567	400	1 PSV	14	Lake Charles	1	2	1	21	1	26

Staging Area: Cameron

Offshore Equipment Preferred 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
MSRC											
Stress I Skimmer (1)	15840	500	1 Utility	5	Grand Isle	1	2	5	21	1	30
Lamor LUF Brush Skimmer (1) <i>1,320' 67" Curtain Pressure Boom</i>	18086	1000	1 PSV	9	Grand Isle	1	2	3.5	21	1	28.5

Lamor LUF Brush Skimmer (1) 1,320' 67" Curtain Pressure Boom	18086	1000	1 PSV	9	Houma	1	2	3.5	21	1	28.5
Foilex 250 Skimmer (1)	3977	400	1 Utility	6	Belle Chasse	1	2	7	24	1	35
Foilex 200 Skimmer (1)	1989	400	1 Utility	6	Belle Chasse	1	2	7	24	1	35
Crucial Disk 56/30 Skimmer (1)	5671	400	1 Utility	6	Belle Chasse	1	2	7	24	1	35
GT-185 Skimmer w Adaptor (1)	1371	500	1 Utility	5	Fort Jackson	1	2	0.5	24	1	28.5
Walosep W4 Skimmer (1)	3017	500	1 Utility	5	Fort Jackson	1	2	0.5	24	1	28.5
Desmi Skimmer (1)	3017	500	1 Utility	5	Fort Jackson	1	2	0.5	24	1	28.5
Stress I Skimmer (1)	15802	500	1 Utility	5	Fort Jackson	1	2	0.5	24	1	28.5
Crucial Disk 88/30 Skimmer (1) 1,320' 67" Curtain Pressure Boom	11122	400	1 PSV	14	Fort Jackson	1	2	9	24	1	37
Crucial Disk 88/30 Skimmer (1) 1,320' 67" Curtain Pressure Boom	11122	400	1 PSV	14	Fort Jackson	1	2	9	24	1	37
Crucial Disk 88/30 Skimmer (1) 1,320' 67" Curtain Pressure Boom	11122	400	1 PSV	14	Fort Jackson	1	2	9	24	1	37

Offshore Equipment Preferred 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	7	21	6	58
MSRC											
67" Curtain Pressure Boom	NA	NA	14*	7	Houston	1	4	4	24	6	39
1000' Fire Resistant Boom	NA	NA	3*	6	Galveston	1	4	5	24	6	40
16000' Fire Resistant Boom	NA	NA	3*	6	Houston	1	4	4	24	6	39
2000' Hydro Fire Boom	NA	NA	8*	8	Lake Charles	1	4	1	22	6	34

* Utility Boats, Crew Boats, Supply Boats, or Fishing Vessels

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											
Mid-Ship SWS	22885	249	NA	4	Leeville	2	0	N/A	48	0	50
Mid-Ship SWS	22885	249	NA	4	Venice	2	0	N/A	48	0	50
Mid-Ship SWS	22885	249	NA	4	Galveston	2	0	N/A	48	0	50
Trinity SWS	21500	249	NA	4	Morgan City	2	0	N/A	48	0	50
Trinity SWS	21500	249	NA	4	Lake Charles	2	0	N/A	48	0	50
Trinity SWS	21500	249	NA	4	Vermilion	2	0	N/A	48	0	50
Trinity SWS	21500	249	NA	4	Galveston	2	0	N/A	48	0	50
46' FRV	15257	65	NA	4	Aransas Pass	2	0	2	16	0	20
46' FRV	15257	65	NA	4	Morgan City	2	0	2	6	0	10
46' FRV	15257	65	NA	4	Lake Charles	2	0	2	2.5	0	6.5
46' FRV	15257	65	NA	4	Venice	2	0	2	11	0	15
MSRC											
MSRC Quick Strike 2 LORI Brush Pack	5000	50	NA	6	Lake Charles	2	0	1	22	1	26
MSRC Quick Strike 2 LORI Brush Pack	5000	50	NA	6	Tampa	2	0	1	52	1	56
Enterprise Marine Services LLC (Available through contract with CGA)											
CTCo 2608	NA	23000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 2609	NA	23000	1 Tug	6	Amelia	26	0	6	15	1	48
CTCo 5001	NA	47000	1 Tug	6	Amelia	26	0	6	15	1	48
Kirby Offshore (available through contract with CGA)											
RO Barge	NA	80000+	1 Tug	6	Venice	19	0	4	36	1	60
RO Barge	NA	80000+	1 Tug	6	Venice	19	0	4	36	1	60
RO Barge	NA	100000+	1 Tug	6	Venice	19	0	4	36	1	60
RO Barge	NA	110000+	1 Tug	6	Venice	19	0	4	36	1	60

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
MSRC											
30 ft. Kvichak Marco / Skimmer (1)	3588	24	NA	6	Galveston	1	1	13	2	1	18
30 ft. Kvichak Marco / Skimmer (1)	3588	24	NA	6	Belle Chasse	1	1	2	2	1	7
30 ft. Kvichak Marco / Skimmer (1)	3588	24	NA	6	Pascagoula	1	1	5.5	2	1	10.5
AardVac Skimmer (1)	3840	400	1 Utility	4	Lake Charles	1	1	1	2	0	5
AardVac Skimmer (1)	3840	400	1 Utility	4	Pascagoula	1	1	9.5	2	0	13.5
Queensboro Skimmer (1)	905	400	1 Utility	4	Galveston	1	1	5	2	0	9
Queensboro Skimmer (5)	4525	2000	5 Utility	20	Lake Charles	1	1	1	2	0	5
Queensboro Skimmer (1)	905	400	1 Utility	4	Belle Chasse	1	1	7	2	0	11
Queensboro Skimmer (1)	905	400	1 Utility	4	Pascagoula	1	1	9.5	2	0	13.5
WP 1 Skimmer (1)	3017	400	1 Utility	4	Pascagoula	1	1	9.5	2	0	13.5
WP 1 Skimmer (1)	3017	400	1 Utility	4	Tampa	1	1	25	2	0	29

Shoreline Protection

Shoreline Protection Boom	VOO	Persons Req.	Storage/Warehouse Location	Hrs to Procure	Hrs to Loadout	Travel to Cameron	Travel to Deployment Site	Hrs to Deploy	Total Hrs
OMI Environmental (available through MSA)									
3,500' 18" Boom	2 Crew	4	Belle Chasse, LA	1	1	8	2	3	15
2,000' 18" Boom	1 Crew	2	Sulfur, LA	1	1	7	2	3	14
4,100' 18" Boom	1 Crew	2	Gonzalez, LA	1	1	8	2	3	15
10,000' 18" Boom	5 Crew	10	Harvey, LA	1	1	7	2	3	14
14,000' 18" Boom	6 Crew	12	Cut Off, LA	1	1	7	2	3	14
2,300' 18" Boom	2 Crew	4	Morgan City, LA	1	1	5	2	3	12
32,200' 18" Boom	10 Crew	20	New Iberia, LA	1	1	4	2	3	11
3,500' 18" Boom	1 Crew	2	Venice, LA	1	1	9	2	3	16
16,000' 18" Boom	6 Crew	12	Deer Park, TX	1	1	4	2	3	11
6,100' 18" Boom	3 Crew	6	La Marque, TX	1	1	4	2	3	11
20,000' 18" Boom	6 Crew	12	Port Arthur, TX	1	1	2	2	3	9

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	7	1	2	14
Bird Scare Guns (24)	NA	NA	NA	2	Harvey	2	2	7	1	2	14
Bird Scare Guns (12)	NA	NA	NA	2	Galveston	2	2	5	1	2	12
Bird Scare Guns (12)	NA	NA	NA	2	Aransas Pass	2	2	9.5	1	2	16.5
Bird Scare Guns (48)	NA	NA	NA	2	Lake Charles	2	2	2	1	2	9
Bird Scare Guns (24)	NA	NA	NA	2	Leeville	2	2	7	1	2	14
MSRC											
Wildlife Rehabilitation Trailer	N/A	N/A	N/A	2	Lake Charles, LA	1	2	1.5	N/A	2	6.5

Response Asset	Total (bbls)
Offshore EDRC	1,034,121
Offshore Recovered Oil Storage	1,198,547+
Nearshore / Shallow Water EDRC	257,401
Nearshore / Shallow Water Recovered Oil Storage	469,975+

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.

Keathley Canyon Block 872/785 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*

LLOG is sensitive to the marine life and the environment we work in, especially regarding activities in or around the moon pool. LLOG will implement and adhere to, the BSEE NTL No. 2015-G03 "Marine Trash and Debris Awareness Training and Elimination" and BOEM NTL No. 2016-G01 "Vessel Strike Avoidance and Injured/Dead Protected Species Reporting", and BOEM NTL No. 2016-G02 "Implementation of Seismic Survey Mitigation Measures and Protected Species Observer Program". 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.

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.nmfsser@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.

These proposed 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.

The specific rig that will be used in the proposed operations has not been identified. A deepwater drilling rig, most likely a dual activity dynamically positioned Drillship with a moonpool will be necessary for the operations. Moonpools on Drillships range in size from 35ft to 45ft in width and 70ft to 130ft in length. The moonpool, located underneath the drilling rig rotary floor, is open to the sea below to allow for passage of wellbore equipment necessary for the construction of the well on the seafloor.

The proposed operations covered by this plan include the drilling, completion and production of wells in Keathley Canyon Blocks 768/829.

The initial start of each drilling operation consists of 7 days of riserless drilling operations where the drilling tools are tripped in and out through the moonpool to the seabed to drill and install the conductor and surface casings and the subsea wellhead which will be installed 10 feet above the seafloor. After the wellhead is in place and included in this initial 7 day time frame, the Blowout Preventer (BOP) will be run on joints of riser through the moonpool and the BOP will be latched onto the wellhead with the joints of riser pipe extending through the moonpool and connected to the rig floor. The remainder of the drilling operations will be conducted through the inside of the riser pipe. The riser pipe will be the only equipment utilized through the moonpool during this time frame. At the end of the drilling operation, the riser and BOP will be retrieved by pulling the equipment through the moonpool and storing on the rig.

The completion operations will involve running the BOP and riser through the moonpool and latching the BOP to the wellhead with joints of riser pipe extending through the moonpool and connected to the rig floor. The entire completion operation will be conducted through the inside of the riser pipe. The riser pipe will be the only equipment utilized through the moonpool during this operation. At the end of the completion, the BOP and riser will be retrieved by pulling the equipment through the moonpool and storing on the rig.

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)

Minerals Management Service (BOEM) invoked Stipulation No. 5 – Protected Species

BSEE NTL No. 2015-G03 “Marine Trash and Debris Awareness and Elimination”; 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”.

LLOG Exploration Offshore, L.L.C. will adhere to the requirements as set forth in the above NTL’s, as applicable, to avoid or minimize impacts to any of the species listed in the ESA as a result of the operations conducted herein.

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 to, the BSEE NTL No. 2015-G03 “Marine Trash and Debris Awareness and Elimination”; 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”.

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

A. *Related OCS Facilities and Operations –*

The subject subsea wells will be equipped with a subsea tree and will flow via a lease term pipeline with associated umbilical's/jumpers to LLOG's existing Keathley Canyon 785 subsea manifold. From here the subject subsea wells will flow through the existing Right-of-Way (ROW) pipelines with associated umbilical to Anadarko's Lucius Spar platform "A" in OCS-G 21444, Keathley Canyon Block 875. This is a manned platform and will process produced hydrocarbons from the incoming subsea wells at Keathley Canyon Block 828 Well SS001 and Keathley Canyon Block 829 Well SS005. Please note that KC 829 Well SS005 was previously approved in DOCD S-8075.

There are no immediate plans to further modify the existing facility.

An approximate 25,050' long x 8.625 O.D. Lease Term pipeline will be installed (via dynamically positioned pipe lay vessel) from the OCS-G-25823, Keathley Canyon Block 872 to a SSTI at the existing subsea manifold in OCS-G-25806, Keathley Canyon Block 785. Two (2) Flowline Jumpers, Two (2) PLETs and One (1) ILS will be installed to connect the subject wells to the proposed Lease Term pipeline and existing subsea manifold (via well and flowline jumpers).

An approximately 26,450' long x 5.32" Lease Term Infield Umbilical will be installed from an Umbilical Termination Assembly (UTA) located in OCS-G 25806, Keathley Canyon Block 785 to an additional UTA near KC 829 Well SS005 and continue to another UTA located near the MC 828 Well No. SS001.

An approximate 80' long x 6.625" lease term well jumper at Keathley Canyon Block 828 Well SS001.

An approximate 80' long x 6.625" lease term well jumper at Keathley Canyon Block 829 Well SS005.

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

<i>Origination Point</i>	<i>Flow Rates</i>	<i>Shut In Time</i>
KC 828 Well 001	2,000 MCFD 8,000 BOPD	< 20 Minutes
KC 829 Well 005	2,300 MCFD 10,000 BOPD	< 20 Minutes

B. Transportation System

LLOG does not anticipate installation of any new/or modified onshore facilities to accommodate the production of Keathley Canyon Block 872/829.

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

DP Semisubmersible Rig and Drillship:

Type	Maximum Fuel Tank Storage Capacity	Maximum No. in Area at Any Time	Trip Frequency or Duration
Supply Boats	500 bbls	1	Six times weekly
Crew Boats	500 bbls	1	Three times weekly
Aircraft	279 gallons	1	As Needed

Type	Maximum Fuel Tank Storage Capacity	Maximum No. in Area at Any Time	Trip Frequency or Duration
ROV Vessel (Jumpers)	8,805 bbls	1	6 days
DP Pipeline Vessel – Lease Term Pipeline/Umbilical	10,000	1	31 days

B. Diesel Oil Supply Vessels

Size of Fuel Supply Vessel	Capacity of fuel Supply Vessel	Frequency of Fuel Transfers	Route Fuel Supply Vessel Will Take
180' OSV	1900 bbls	1/weekly	Fourchon, LA to Keathley Canyon 785/872

B. Drilling Fluids Transportation

Drilling fluid transportation information is not required to be submitted with this plan.

C. Solid and Liquid Wastes Transportation

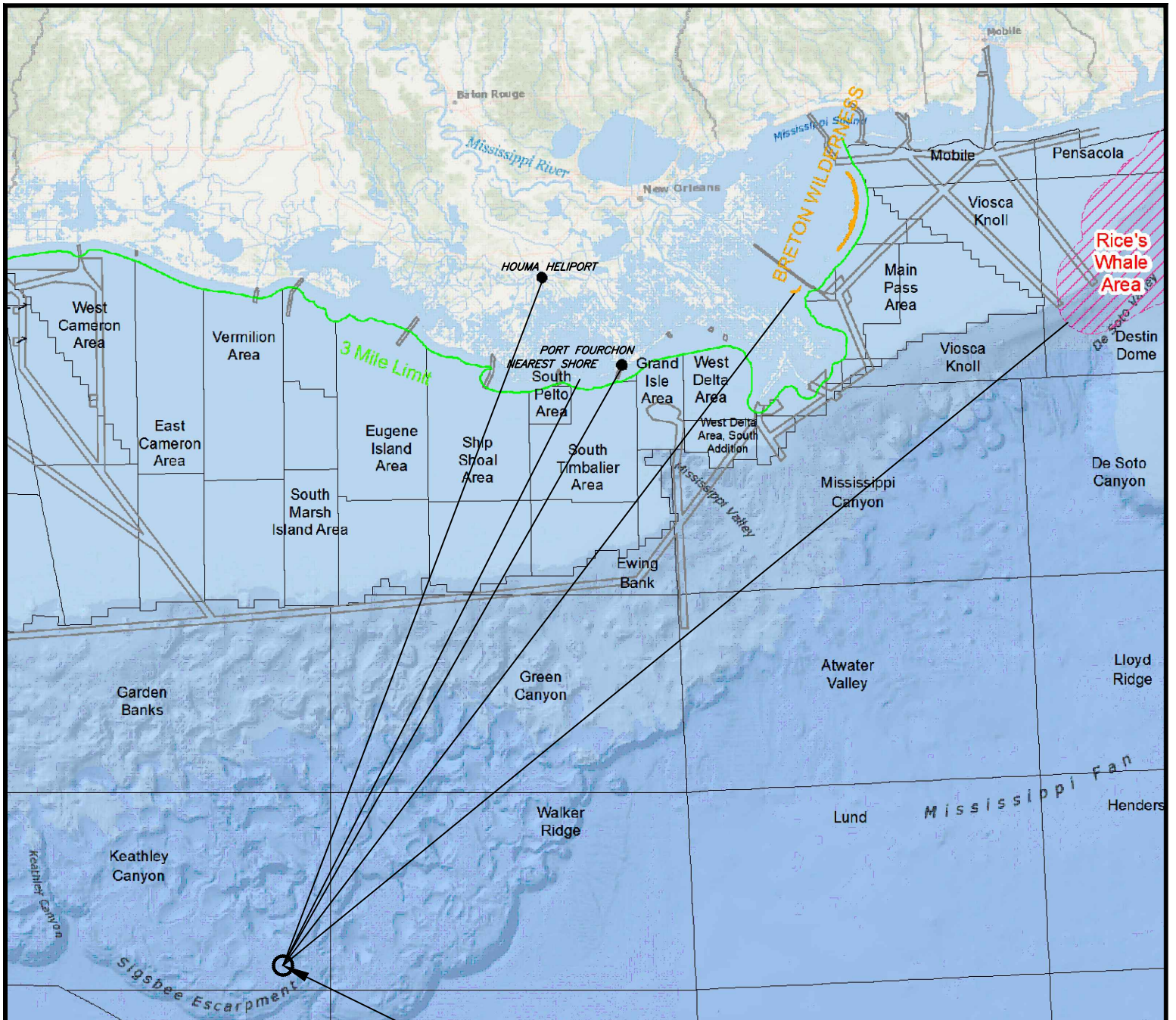
See Table 2 – Wastes you will Transport and/or Dispose of Onshore, located in Appendix G of this Plan.

D. Vicinity Map

Vicinity Plats showing the locations of Keathley Canyon Blocks 785/872 relative to the nearest shoreline, heliport and onshore base are included as **Attachment N-1**.

Vicinity Maps

Attachment N-1 (Public Information)



SITE OF PROPOSED WELLS

~214 STATUTE (186 NAUTICAL) MILES TO TERREBONNE PARISH (NEAREST SHORE)
 COORDINATE TO NEAREST POINT ON SHORELINE X = 2,293,543 Y = 10,549,835
 ~238 STATUTE (207 NAUTICAL) MILES TO PORT FOURCHON, LA
 ~254 STATUTE (220 NAUTICAL) MILES TO HOUMA HELIPORT, HOUMA, LA
 ~401 STATUTE (348 NAUTICAL) MILES TO RICE'S WHALE AREA
 ~469 KILOMETERS TO BRETON WILDERNESS

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.**



Echo OFFSHORE LLC
 36499 Perkins Road
 Prairieville, Louisiana 70769
 Tel: 225-673-2163

NOT TO SCALE

**EXPLORATION PLAT
PROPOSED WELLS 'C' & 'ALT C'
OCS-G 25813 BLOCK 828 WITH SURFACE LOCATION IN BLOCK 872
KEATHLEY CANYON AREA**

GULF OF MEXICO

DATUM: NAD 27	SPHEROID: CLARKE 1866	PROJECTION: U.T.M.	ZONE: 15	DRAWN BY: RJN	CHK. BY: MEK	REV. No.: 2	JOB No.: 23-026	DWG No.: 23-026-EXP_KC828_C_REV2
				DATE: 6/12/2023	REV. DATE: 6/15/2023	SCALE: N.T.S.	SHEET 1 OF 1	

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

A. General

The proposed operations in Keathley Canyon Block 872/829 will be located approximately 214 statute miles from the nearest Louisiana shoreline, approximately 238 statute miles from the onshore support base in Fourchon, LA and 254 miles to Houma Heliport, Houma, LA:

Name	Location	Existing/New/Modified
LLOG c/o GIS Yard	Fourchon, LA	Existing
Houma Heliport	Houma, LA	Existing

LLOG will use an existing onshore base to accomplish the following routine operations:

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

B. Support Base Construction or Expansion

The proposed operations are temporary in nature and do not require any immediate action to acquire additional land or expand existing base facilities.

C. Support Base Construction or Expansion Timetable

This section of the plan is not applicable to the proposed operations.

D. Waste Disposal

See Table 2 – Appendix G – Wastes You Will Transport and/or Dispose of Onshore.

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

Certificate of Coastal Zone Management Consistency for the State of Louisiana is not required for Supplemental DOCDs.

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

LLOG does not anticipate any unforeseen incidents from the proposed activities which could significantly impact the associated environment. LLOG activities associated with this Supplemental Development Operations Coordination Document (DOCD) will be performed with prudent and industry accepted standards, and in compliance with the federal agency regulations and oversight. The “Oil Spills Information” Section of this Plan details the potential worse case discharge volume which has been calculated based on the new Bureau of Ocean Energy Management (BOEM) Notice to Lessees (NTL 2015-N01). Response details associated with an unanticipated spill from this site are detailed in our Regional Oil Spill Response Plan (OSRP) which outlines the potential spill scenario, spill volumes, anticipated trajectory of the spill, response equipment available, and actions to be taken to respond to the potential spill incident. Additional measures implemented by LLOG is trajectory analyses to be obtained prior to and during the proposed activities, contractual arrangements with well control specialists and preliminary reviews of potential well intervention scenarios, and to supplement existing contracted response/clean-up equipment with equipment which specializes in subsea deepwater well intervention, containment and processing.

**COASTAL ZONE MANAGEMENT ACT (CZMA) INFORMATION
(30 CFR PART 550.226 AND 550.260)**

LLOG Offshore Exploration, L. L. C. (LLOG)

**Supplemental DOCD
Keathley Canyon Blocks 828, 829, and 872
OCS-G G325813 / G252814 / G25823**

(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			X(8)	X
Sea Turtles	X(8)	X			X(8)	X
Air quality	X(9)					
Shipwreck sites (known or potential)			(7)			
Prehistoric archaeological sites			(7)			
Vicinity of Offshore Location						
Essential fish habitat		X			X(6)	
Marine and pelagic birds					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)	
Coastal wildlife refuges						
Wilderness areas						

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-meter, 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 feet from any no-activity zone; or
 - o Proximity of any submarine bank (500-foot buffer zone) with relief greater than two 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.

TABLE 1: THREATENED AND ENDANGERED SPECIES, CRITICAL HABITAT, AND MARINE MAMMAL INFORMATION

The federally listed endangered and threatened species potentially occurring in the lease area and along the Gulf Coast are provided in the table below

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico	Gulf of Mexico Range
			Lease Area	Coastal		
Marine Mammals						
Manatee, West Indian	<i>Trichechus manatus latirostris</i>	T	--	X	Florida (peninsular)	Coastal Louisiana, Mississippi, Alabama, and Florida
Whale, Blue	<i>Balaenoptera masculus</i>	E	X ¹	--	None	GOM
Whale, Bryde's ⁴	<i>Balaenoptera brydei/edeni</i>	E	X	--	None	Eastern GOM
Whale, Fin	<i>Balaenoptera physalus</i>	E	X ¹	--	None	GOM
Whale, Humpback	<i>Megaptera novaeangliae</i>	E	X ¹	--	None	GOM
Whale, North Atlantic Right	<i>Eubalaena glacialis</i>	E	X ¹	--	None	GOM
Whale, Rice's ⁴	<i>Balaenoptera ricei</i>	E	X	--	None	GOM
Whale, Sei	<i>Balaenoptera borealis</i>	E	X ¹	--	None	GOM
Whale, Sperm	<i>Physeter catodon</i> (= <i>macrocephalus</i>)	E	X	--	None	GOM
Terrestrial Mammals						
Mouse, Beach (Alabama, Choctawatchee, Perdido Key, St. Andrew)	<i>Peromyscus polionotus</i>	E	-	X	Alabama, Florida (panhandle) beaches	Alabama, Florida (panhandle) beaches
Birds						
Plover, Piping	<i>Charadrius melodus</i>	T	-	X	Coastal Texas, Louisiana, Mississippi, Alabama, and Florida (panhandle)	Coastal GOM
Crane, Whooping	<i>Grus Americana</i>	E	-	X	Coastal Texas	Coastal Texas and Louisiana
Crane, Mississippi sandhill	<i>Grus canadensis pulla</i>	E	-	X	Coastal Mississippi	Coastal Mississippi
Curlew, Eskimo	<i>Numenius borealis</i>	E	-	X	none	Coastal Texas
Falcon, Northern Aplomado	<i>Falco femoralis septentrionalis</i>	E	-	X	none	Coastal Texas

Species	Scientific Name	Status	Potential Presence		Critical Habitat Designated in the Gulf of Mexico	Gulf of Mexico Range
			Lease Area	Coastal		
Knot, Red	<i>Calidris canutus rufa</i>	T	-	X	None	Coastal GOM
Stork, Wood	<i>Mycteria americana</i>	T	-	X	None	Coastal Alabama and Florida
Reptiles						
Sea Turtle, Green	<i>Chelonia mydas</i>	T/E ³	X	X	None	GOM
Sea Turtle, Hawksbill	<i>Eretmochelys imbricata</i>	E	X	X	None	GOM
Sea Turtle, Kemp's Ridley	<i>Lepidochelys kempi</i>	E	X	X	None	GOM
Sea Turtle, Leatherback	<i>Derموchelys coriacea</i>	E	X	X	None	GOM
Sea Turtle, Loggerhead	<i>Caretta caretta</i>	T	X	X	Texas, Louisiana, Mississippi, Alabama, Florida	GOM
Fish						
Sturgeon, Gulf	<i>Acipenser oxyrinchus (=oxyrinchus) desotoi</i>	T	X	X	Coastal Louisiana, Mississippi, Alabama, and Florida (panhandle)	Coastal Louisiana, Mississippi, Alabama, and Florida (panhandle)
Shark, Oceanic Whitetip	<i>Carcharhinus longimanus</i>	E	X	-	None	GOM
Sawfish, Smalltooth	<i>Pristis pectinate</i>	E	-	X	None	Florida
Groupers, Nassau	<i>Epinephelus striatus</i>	T	-	X	None	Florida
Ray, Giant Manta	<i>Manta birostris</i>	E	X	--	None	GOM
Corals						
Coral, Elkhorn	<i>Acopora palmate</i>	T	X ²	X	Florida Keys and Dry Tortugas	Flower Garden Banks, Florida, and the Caribbean
Coral, Staghorn	<i>Acopora cervicornis</i>	T	X	X	Florida	Flower Garden Banks, Florida, and the Caribbean
Coral, Boulder Star	<i>Orbicella franksi</i>	T	X	X	none	Flower Garden Banks and Florida
Coral, Lobed Star	<i>Orbicella annularis</i>	T	X	X	None	Flower Garden Banks and Caribbean
Coral, Mountainous Star	<i>Orbicella faveolata</i>	T	X	X	None	Flower Garden Banks and Gulf of Mexico
Coral, Rough Cactus	<i>Mycetophyllia ferox</i>	T	-	X	None	Florida and Southern Gulf of Mexico

Abbreviations: E = Endangered; T = Threatened

1 The Blue, Fin, Humpback, North Atlantic Right, and Sei Whales are rare or extralimital in the Gulf of Mexico and are unlikely to be present in the lease area.

2 According to the 2017 EIS, Elkhorn Coral, while uncommon, has been found in the Flower Garden Banks. (BOEM 2017-009)

3 Green Sea Turtles are considered threatened throughout the Gulf of Mexico; however, the breeding population off the coast of Florida is considered endangered.

4 The Bryde's whale, also known as the Bryde's whale complex, is a collection of baleen whales that are still being researched to determine if they are the same species or if they are individual species of whales. In 2021, the Rice's whale, formerly known as the Gulf of Mexico Bryde's whale, was determined to be a separate species. There are less than 100 Rice's whales living in the Gulf of Mexico year-round. These whales retain all the protections of the Gulf of Mexico Bryde's whale under the Endangered Species Act while the regulations are being updated to reflect the name change. Other Bryde's whales are migratory and may enter the Gulf of Mexico; however, the migratory Bryde's whales are rare or extralimital in the Gulf of Mexico and are unlikely to be present in the lease area.

(B) Analysis

Site-Specific at Keathley Canyon Blocks 828, 829 and 872

Proposed Operations consist of the Drilling, completion, and temporary abandonment of three wells (B, C, and H) with three alternate wells in case of failure.

The operations will be conducted with a Drillship or semi-submersible rig.

There are no seismic surveys, pile driving, or pipelines making landfall associated with the operations covered by this Plan.

1. Designated Topographic Features

Potential IPFs to topographic features as a result of the Proposed Operations include physical disturbances to the seafloor, effluents, and accidents.

Physical disturbances to the seafloor: Keathley Canyon Blocks 828, 829 and 872 are 120.7 miles, 121.3 miles and 123.8 miles, respectively from the closest designated Topographic Features Stipulation Block (Sidner Bank); therefore, no adverse impacts are expected. Additionally, a Drillship or semi-submersible rig is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed.

Effluents: Keathley Canyon Blocks 828, 829 and 872 are 120.7 miles, 121.3 miles and 123.8 miles, respectively from the closest designated Topographic Features Stipulation Block (Sidner 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-meter 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 meters, oil from a surface spill is not expected to 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's Regional OSRP (refer to information submitted in **Appendix H**).

If dispersants were utilized as a response method, the fate and effects of spilled oil would be impacted. Dispersants have been utilized in previous spill response efforts and were used extensively in the response to the Deepwater Horizon oil spill, with both surface and sub-surface applications. Reports on dispersant usage on surface oil indicate that a majority of the dispersed oil remains in the top 10 meters of the water column, with 60 percent of the oil in the top two meters of water (McAuliffe et al, 1981; Lewis and Aurand, 1997; OCS Report BOEM 2017-007).

Lubchenco et al. (2010) report that most chemically dispersed surface oil from the Deepwater Horizon explosion and oil spill remained in the top six meters of the water column where it mixed with surrounding waters and biodegraded (BOEM 2017-007). None of the topographic features or potentially sensitive biological features in the GOM are shallower than 10 meters (33 feet), and only the Flower Garden Banks are shallower than 20 meters (66 feet).

In one extraordinary circumstance with an unusual combination of meteorological and oceanographic conditions, a tropical storm forced a large volume of Deepwater Horizon oil spill-linked surface oil/dispersant mixture to as deep as 75 meters (246 feet), causing temporary exposure to mesophotic corals in the Pinnacle Trend area and leading to some coral mortality and sublethal impacts (Silva et al., 2015; BOEM 2017-007).

Additionally, concentrations of dispersed and dissolved oil in the Deepwater Horizon oil-spill subsea plume were reported to be in the parts per million range or less and were generally lower away from the water's surface and away from the well head (Adcroft et al., 2010; Haddad and Murawski, 2010; Joint Analysis Group, 2010; Lubchenco et al, 2010; BOEM 2017-007).

In the case of subsurface spills like a blowout or pipeline leak, dispersants may be injected at the seafloor. This will increase oil concentrations near the source but tend to decrease them further afield, especially at the surface. Marine organisms in the lower water column will be exposed to an initial increase of water-soluble oil compounds that will dilute in the water column over time (Lee et al., 2013a; NAS 2020).

Dispersant application involves a trade-off between decreasing the risk to the surface and shoreline habitat and increasing the risk beneath the surface. The optimal trade-off must account for various factors, including the type of oil spilled, the spill volume, the weather and sea state, the water depth, the degree of turbulence, and the relative abundance and life stages of organisms (NRC, 2005; NAS 2020).

Chemical dispersants may increase the risk of toxicity to subsurface organisms by increasing bioavailability of the oil. However, it is important to note that at the 1:20 dispersant-to-oil ratio recommended for use during response operations, the dispersants currently approved for use are far less acutely toxic than oil is. Toxicity of chemically dispersed oil is primarily due to the oil itself and its enhanced bioavailability (Lee et al., 2015; NAS 2020).

With the exception of special Federal management areas or designated exclusion areas, dispersants have been preapproved for surface use, which provides the USCG On-Scene Coordinator with the authority to approve the use of dispersants. However, that approval would only be granted upon completion of the protocols defined in the appropriate Area Contingency Plan (ACP) and the Regional Response Team (RRT) Dispersant Plan. The protocols include conducting an environmental benefit analysis to determine if the dispersant use will prevent a substantial threat to the public health or welfare or minimize serious environmental damage. The Regional Response Team would be notified immediately to provide technical support and guidance in determining if

the dispersant use meets the established criteria and provide an environmental benefit. Additionally, there is currently no preapproval for subsea dispersant injection and the USCG On-Scene Coordinator must approve use of this technology before any subsea application. Due to the unprecedented volume of dispersants applied for an extended period of time, the U.S. National Response Team has developed guidance for atypical dispersant operations to ensure that planning and response activities will be consistent with national policy (BOEM 2017-007).

Dispersants were used extensively in the response to the Deepwater Horizon oil spill, both surface and sub-surface applications. However, during a May 2016 significant oil spill (approximately 1,926 barrels) in the Gulf of Mexico dispersants were not utilized as part of the response. The Regional Response Team was consulted and recommended that dispersants not be used, despite acknowledging the appropriate protocols were correctly followed and that there was a net environmental benefit in utilizing dispersants. This demonstrates that the federal authorities (USCG and RRT) will be extremely prudent in their decision-making regarding dispersant use authorizations.

Due to the distance of these blocks from a topographic area and the coverage of the activities proposed in this plan by LLOG's Regional OSRP (refer to information submitted in **Appendix H**), impacts to topographic features from surface or sub-surface oil spills are not expected.

There are no other IPFs (including emissions and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact topographic features.

2. Pinnacle Trend Area Live Bottoms

Potential IPFs to pinnacle trend area live bottoms from the Proposed Operations include physical disturbances to the seafloor, emissions (noise / sound), effluents, and accidents.

Physical disturbances to the seafloor: Keathley Canyon Blocks 828, 829 and 872 are 309.4 miles, 307.2 miles and 311.5 miles, respectively from the closest live bottom (pinnacle trend) area; therefore, no adverse impacts are expected. Additionally, a Drillship or semi-submersible rig is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed.

Emissions (noise / sound): All routine OCS oil-and gas-related activities have some element of sound generation. Common sound sources include propeller cavitation, rotating machinery, and reciprocating machinery, which are associated with routine OCS oil-and gas-related activities such as vessel traffic, drilling, construction, and oil and gas production, processing, and transport. Sound introduced into the marine environment as a result of human activities has the potential to affect marine organisms. Although there is little information available on sound detection and sound-mediated behaviors for marine invertebrates, the overall impacts on pinnacle and low-relief feature communities from anthropogenic noise are expected to be negligible (BOEM 2017-009). Additionally, Keathley Canyon Blocks 828, 829 and 872 are 309.4 miles, 307.2 miles and 311.5

miles, respectively from the closest live bottom (pinnacle trend) area; therefore, no adverse impacts are expected.

Effluents: Keathley Canyon Blocks 828, 829 and 872 are 309.4 miles, 307.2 miles and 311.5 miles, respectively 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-meter 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 expected to impact pinnacle trend area live bottoms due to the distance of these blocks from a live bottom (pinnacle trend) area and the coverage of the activities proposed in this plan by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

If dispersants were utilized as a response method, the fate and effects of spilled oil would be impacted. A detailed discussion on dispersants, their usage during the Deepwater Horizon oil spill, and their impacts on different levels of benthic communities can be found in **Item 1**.

There are no other IPFs (including wastes sent to shore for treatment or disposal) from the proposed activities that are likely to impact a live bottom (pinnacle trend) area.

3. Eastern Gulf Live Bottoms

Potential IPFs on Eastern Gulf live bottoms from the Proposed Operations include physical disturbances to the seafloor, emissions (noise / sound), effluents, and accidents.

Physical disturbances to the seafloor: Keathley Canyon Blocks 828, 829 and 872 are 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. Additionally, a Drillship or semi-submersible rig is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed.

Emissions (noise / sound): All routine OCS oil-and gas-related activities have some element of sound generation. Common sound sources include propeller cavitation, rotating machinery, and reciprocating machinery, which are associated with routine OCS oil-and gas-related activities such as vessel traffic, drilling, construction, and oil and gas production, processing, and transport. Sound introduced into the marine environment as a result of human activities has the potential to affect marine organisms. Although there is little information available on sound detection and sound-mediated behaviors for marine invertebrates, the overall impacts on pinnacle and low-relief feature communities from anthropogenic noise are expected to be negligible (BOEM 2017-009).

Additionally, Keathley Canyon Blocks 828, 829 and 872 are not located in an area characterized by the existence of live bottoms; therefore, no adverse impacts are expected.

Effluents: Keathley Canyon Blocks 828, 829 and 872 are not located in an area characterized by the existence of live bottoms; 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 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-meter 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 expected to impact Eastern Gulf live bottoms due to the distance of these blocks from a live bottom area and coverage of the activities proposed in this plan by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

If dispersants were utilized as a response method, the fate and effects of spilled oil would be impacted. A detailed discussion on dispersants, their usage during the Deepwater Horizon oil spill, and their impacts on different levels of benthic communities can be found in **Item 1**.

There are no other IPFs (including wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact an Eastern Gulf live bottom area.

4. Deepwater Benthic Communities

There are no IPFs (including emissions (noise / sound), physical disturbances to the seafloor, wastes sent to shore for treatment or disposal, and accidents) from the Proposed Operations that are likely to cause impacts to deepwater benthic communities.

Keathley Canyon Blocks 828, 829 and 872 are located in water depths of 984 feet (300 meters) or greater. At such depth high-density, deepwater benthic communities may sometimes be found. However, Keathley Canyon Blocks 828, 829 and 872 are approximately 41.7 miles, 41.2 miles and 44.7 miles, respectively from a known deepwater benthic community site (Keathley Canyon Block 216), listed in NTL 2009-G40. Additionally, a Drillship or semi-submersible rig is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed. Due to the distance from the closest known deepwater benthic community and because physical disturbances to the seafloor will be minimized by the use of a Drillship or semi-submersible rig, LLOG's Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 are not likely to impact deepwater benthic communities.

Deepwater benthic communities would potentially be subject to detrimental effects from a catastrophic seafloor blowout due to sediment and oiled sediment from the initial event (BOEM 2017-007). However, this is unlikely due to the distancing requirements described in NTL 2009-

G40. Additionally, the potential impacts would be localized due to the directional movement of oil plumes by water currents and the scattered, patchy distribution of sensitive habitats. Although widely dispersed, biodegraded particles of a passing oil plume might impact patchy habitats, no significant impacts would be expected to the Gulfwide population. Most deepwater benthic communities are expected to experience no impacts from a catastrophic seafloor blowout due to the directional movement of oil plumes by the water currents and their scattered, patchy distribution. Impacts may be expected if a spill were to occur close to a deepwater benthic habitat, however, beyond the localized area of impact particles would become increasingly biodegraded and dispersed. Localized impacts to deepwater benthic organisms would be expected to be mostly sublethal (BOEM 2017-007).

If dispersants were utilized as a response method, the fate and effects of spilled oil would be impacted. A detailed discussion on dispersants, their usage during the Deepwater Horizon oil spill, and their impacts on different levels of benthic communities can be found in **Item 1**.

5. Water Quality

Potential IPFs that could result in water quality degradation from the Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 include disturbances to the seafloor, effluents, and accidents.

Physical disturbances to the seafloor: Bottom area disturbances resulting from the emplacement of drill rigs, the drilling of wells and the installation of platforms and 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. Additionally, a Drillship or semi-submersible rig is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed.

Effluents: Levels of contaminants in drilling muds and cuttings and produced water discharges, discharge-rate restrictions and monitoring and toxicity testing are regulated by the EPA NPDES permit, thereby eliminating many significant biological or ecological effects. Operational discharges are not expected to cause significant adverse impacts to water quality. Additionally, an analysis of the best available information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico (NMFS, 2020) concludes that exposures to toxicants in discharges from oil and gas activities are not likely to adversely affect ESA-listed species.

Accidents: IPFs related to OCS oil- and gas-related accidental events primarily involve drilling fluid spills, chemical spills, and oil spills.

Drilling Fluid Spills

Water-based fluid (WBF) and Synthetic-based fluid (SBF) spills may result in elevated turbidity, which would be short term, localized, and reversible. The WBF is normally discharged to the seafloor during riserless drilling, which is allowable due to its low toxicity. For the same reasons, a spill of WBF would have negligible impacts. The SBF has low toxicity, and the discharge of SBF is allowed to the extent that it adheres onto drill cuttings. Both USEPA Regions 4 and 6 permit the discharge of cuttings wetted with SBF as long as the retained SBF amount is below a prescribed percent, meets biodegradation and toxicity requirements, and is not contaminated with the formation oil or PAH. A spill of SBF may cause a temporary increase in biological oxygen demand and locally result in lowered dissolved oxygen in the water column. Also, a spill of SBF may release an oil sheen if formation oil is present in the fluid. Therefore, impacts from a release of SBF are considered to be minor. Spills of SBF typically do not require mitigation because SBF sinks in water and naturally biodegrades, seafloor cleanup is technically difficult, and SBF has low toxicity. (BOEM 2017-009)

Chemical Spills

Accidental chemical spills could result in temporary localized impacts on water quality, primarily due to changing pH. Chemical spills are generally small volume compared with spills of oil and drilling fluids. During the period of 2007 to 2014, small chemical spills occurred at an average annual volume of 28 barrels, while large chemical spills occurred at an average annual volume of 758 barrels. These chemical spills normally dissolve in water and dissipate quickly through dilution with no observable effects. Also, many of these chemicals are approved to be commingled in produced water for discharge to the ocean, which is a permitted activity. Therefore, impacts from chemical spills are considered to be minor and do not typically require mitigation because of technical feasibility and low toxicity after dilution (BOEM 2017-009).

Oil Spills

Oil spills have the greatest potential of all OCS oil-and gas-related activities to affect water quality. Small spills (<1,000 barrels) are not expected to substantially impact water quality in coastal or offshore waters because the oil dissipates quickly through dispersion and weathering while still at sea. Reasonably foreseeable larger spills ($\geq 1,000$ barrels), however, could impact water quality in coastal and offshore waters (BOEM 2017-007). However, based on data provided in the BOEM 2016 Update of Occurrence Rates for Offshore Oil Spills, it is unlikely that an accidental surface or subsurface spill of a significant volume would occur from the proposed activities. Between 2001 and 2015 OCS operations produced eight billion barrels of oil and spilled 0.062 percent of this oil, or one barrel for every 1,624 barrels produced. (The overall spill volume was almost entirely accounted for by the 2010 Deepwater Horizon blowout and subsequent discharge of 4.9 million barrels of oil. Additional information on unlikely scenarios and impacts from very large oil spills are discussed in the Catastrophic Spill Event Analysis white paper (BOEM 2017-007).

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. Dispersants will only be used if approved by the Regional Response Team in coordination with the RRT Dispersant Plan and RRT Biological Assessment for Dispersants.

Oil spills, regardless of size, may allow hydrocarbons to partition into the water column in a dissolved, emulsion, and/or particulate phase. Therefore, impacts from reasonably foreseeable oil spills are considered moderate. Mitigation efforts for oil spills may include booming, burning, and the use of dispersants (BOEM 2017-009).

These methods may cause short-term secondary impacts to water quality, such as the introduction of additional hydrocarbon into the dissolved phase through the use of dispersants and the sinking of hydrocarbon residuals from burning. Since burning and the use of dispersants put additional hydrocarbons into the dissolved phase, impacts to water quality after mitigation efforts are still considered to be moderate, because dissolved hydrocarbons extend down into the water column. This results in additional exposure pathways via ingestion and gill respiration and may result in acute or chronic effects to marine life (BOEM 2017-009).

Most oil-spill response strategies and equipment are based upon the simple principle that oil floats. However, as evident during the Deepwater Horizon explosion, oil spill, and response, this is not always true. Sometimes it floats and sometimes it suspends within the water column or sinks to the seafloor (BOEM 2017-009).

Oil that is chemically dispersed at the surface moves into the top six meters of the water column where it mixes with surrounding waters and begins to biodegrade (U.S. Congress, Office of Technology Assessment, 1990). Dispersant use, in combination with natural processes, breaks up oil into smaller components that allows them to dissipate into the water and degrade more rapidly (Nalco, 2010). Dispersant use must be in accordance with an RRT Preapproved Dispersant Use Manual and with any conditions outlined within an RRT's site-specific, dispersant approval given after a spill event. Consequently, dispersant use must be in accordance with the restrictions for specific water depths, distances from shore, and monitoring requirements. At this time, neither the Region IV nor the Region VI RRT dispersant use manuals, which cover the GOM region, give preapproval for the application of dispersant use subsea (BOEM 2017-009).

The operations proposed in this plan will be covered by LLOG's Regional Oil Spill Response Plan, which discusses potential response actions in more detail (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact water quality.

6. Fisheries

There are multiple species of fish in the Gulf of Mexico, including the endangered and threatened species listed in **Table 1** at the beginning of this Environmental Impact Assessment. More information regarding the endangered gulf sturgeon (**Item 20.2**), oceanic whitetip shark (**Item 20.3**), and giant manta ray (**Item 20.4**) can be found below. Potential IPFs to fisheries as a result of the Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 include physical disturbances to the seafloor, emissions (noise / sound), effluents, 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. Additionally, a Drillship or semi-submersible rig is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed.

Emissions (noise / sound): All routine OCS oil-and gas-related activities have some element of sound generation. Common sound sources include propeller cavitation, rotating machinery, and reciprocating machinery, which are associated with routine OCS oil-and gas-related activities such as vessel traffic, drilling, construction, and oil and gas production, processing, and transport. Sound introduced into the marine environment as a result of human activities has the potential to affect marine organisms by stimulating behavioral response, masking biologically important signals, causing temporary or permanent hearing loss (Popper et al., 2005; Popper et al., 2014), or causing physiological injury (e.g., barotrauma) resulting in mortality (Popper and Hastings, 2009). The potential for anthropogenic sound to affect any individual organism is dependent on the proximity to the source, signal characteristics, received peak pressures relative to the static pressure, cumulative sound exposure, species, motivation, and the receiver's prior experience. In addition, environmental conditions (e.g., temperature, water depth, and substrate) affect sound speed, propagation paths, and attenuation, resulting in temporal and spatial variations in the received signal for organisms throughout the ensonified area (Hildebrand, 2009).

Sound detection capabilities among fishes vary. For most fish species, it is reasonable to assume hearing sensitivity to frequencies below 500 Hertz (Hz) (Popper et al., 2003 and 2014; Popper and Hastings, 2009; Slabbekoorn et al., 2010; Radford et al., 2014). The band of greatest interest to this analysis, low-frequency sound (30-500 Hz), has come to be dominated by anthropogenic sources and includes the frequencies most likely to be detected by most fish species. For example, the noise generated by large vessel traffic typically results from propeller cavitation and falls within 40-150 Hz (Hildebrand, 2009; McKenna et al., 2012). This range is similar to that of fish vocalizations and hearing and could result in a masking effect.

Masking occurs when background noise increases the threshold for a sound to be detected; masking can be partial or complete. If detection thresholds are raised for biologically relevant signals, there is a potential for increased predation, reduced foraging success, reduced reproductive success, or other effects. However, fish hearing and sound production may be adapted to a noisy

environment (Wysocki and Ladich, 2005). There is evidence that fishes are able to efficiently discriminate between signals, extracting important sounds from background noise (Popper et al., 2003; Wysocki and Ladich, 2005). Sophisticated sound processing capabilities and filtering by the sound sensing organs essentially narrows the band of masking frequencies, potentially decreasing masking effects. In addition, the low-frequency sounds of interest propagate over very long distances in deep water, but these frequencies are quickly lost in water depths between $\frac{1}{2}$ and $\frac{1}{4}$ the wavelength (Ladich, 2013). This would suggest that the potential for a masking effect from low-frequency noise on behaviors occurring in shallow coastal waters may be reduced by the receiver's distance from sound sources, such as busy ports or construction activities.

Pulsed sounds generated by OCS oil-and gas-related activities (e.g., impact-driven piles and airguns) can potentially cause behavioral response, reduce hearing sensitivity, or result in physiological injury to fishes and invertebrate resources. However, there are no pulsed sound generation activities proposed for these operations.

Support vessel traffic, drilling, production facilities, and other sources of continuous sounds contribute to a chronic increase in background noise, with varying areas of effect that may be influenced by the sound level, frequencies, and environmental factors (Hildebrand, 2009; Slabbekoorn et al., 2010; McKenna et al., 2012). These sources have a low potential for causing physiological injury or injuring hearing in fishes and invertebrates (Popper et al., 2014). However, continuous sounds have an increased potential for masking biologically relevant sounds than do pulsed signals. The potential effects of masking on fishes and invertebrates are difficult to assess in the natural setting for communities and populations of species, but evidence indicates that the increase to background noise as a result of OCS oil and gas operations would be relatively minor. Therefore, it is expected that the cumulative impact to fishes and invertebrate resources would be minor and would not extend beyond localized disturbances or behavioral modification.

Despite the importance of many sound-mediated behaviors and the potential biological costs associated with behavioral response to anthropogenic sounds, many environmental and biological factors limit potential exposure and the effects that OCS oil-and gas-related sounds have on fishes and invertebrate resources. The overall impact to fishes and invertebrate resources due to anthropogenic sound introduced into the marine environment by OCS oil-and gas-related routine activities is expected to be minor.

Effluents: Effluents such as drilling fluids and cuttings discharges contain components and properties which are detrimental to fishery resources. Moderate petroleum and metal contamination of sediments and the water column can occur out to several hundred meters down current from the discharge point. Offshore discharges are expected to disperse and dilute to very near background levels in the water column or on the seafloor within 3,000 meters of the discharge point and are expected to have negligible effect on fisheries. Additionally, an analysis of the best available information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico (NMFS, 2020) concludes that exposures to toxicants in discharges from oil and gas activities are not likely to adversely affect ESA-listed species.

Accidents: Collisions between support vessels and ESA-listed fish, would be unusual events, however, should one occur, death or injury to ESA-listed fish is possible. Contract vessel operators can avoid protected aquatic species and reduce potential deaths by maintaining a vigilant watch and a distance of 50 meters or greater, with the exception of animals that approach the vessel. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico Outer Continental Shelf (OCS).

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion 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.

Should an ESA-listed fish (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) be entrapped, entangled, or injured, personnel should contact the ESA Section 7 biologist at (301) 427-8413 (nmfs.psoreview@noaa.gov) and report all incidents to takereport.nmfsser@noaa.gov. After making the appropriate notifications, LLOG may call BSEE at (985) 722-7902 for questions or additional guidance on recovery assistance needs, continued monitoring requirements, and incidental report information which at minimum is detailed below. 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.nmfsser@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.

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's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to cause impacts to fisheries.

7. Marine Mammals

The latest population estimates for the Gulf of Mexico 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. The Rice's whale (née Gulf of Mexico Bryde's whale) is the only commonly occurring baleen whale in the northern Gulf of Mexico and has been sighted off western Florida and in the De Soto Canyon region. Florida manatees have been sighted along the entire northern GOM but are mainly found in the shallow coastal waters of Florida, which are unassociated with the proposed actions. A complete list of all endangered and threatened marine mammals in the GOM may be found in **Table 1** at the beginning of this Environmental Impact Assessment. More information regarding the endangered Rice's whale can be found in **Item 20.1** below. Potential IPFs to marine mammals as a result of the Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 include emissions (noise / sound), effluents, discarded trash and debris, and accidents.

Emissions (noise / sound): Noises from drilling activities, support vessels and helicopters (i.e., non-impulsive anthropogenic sound) 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). Responses to sound exposure may include lethal or nonlethal injury, temporary hearing impairment, behavioral harassment and stress, or no apparent response. Noise-induced stress is possible, but it is little studied in marine mammals. Tyack (2008) suggests that a more significant risk to marine mammals from sound are these less visible impacts of chronic exposure. There is little conclusive evidence for long-term displacements and population trends for marine mammals relative to noise.

Vessels are the greatest contributors to increases in low-frequency ambient sound in the sea (Andrew et al. 2011). Sound levels and tones produced are generally related to vessel size and speed. Larger vessels generally emit more sound than smaller vessels, and vessels underway with a full load, or those pushing or towing a load, are noisier than unladen vessels. Cetacean responses to aircraft depend on the animals' behavioral state at the time of exposure (e.g., resting, socializing, foraging, or traveling) as well as the altitude and lateral distance of the aircraft to the animals (Luksenburg and Parsons 2009). The underwater sound intensity from aircraft is less than produced by vessels, and visually, aircraft are more difficult for whales to locate since they are not in the water and move rapidly (Richter et al. 2006). Perhaps not surprisingly then, when aircraft are at higher altitudes, whales often exhibit no response, but lower flying aircraft (e.g., approximately 500 meters or less) have been observed to elicit short-term behavioral responses (Luksenburg and Parsons 2009; NMFS 2017b; NMFS 2017f; Patenaude et al. 2002; Smultea et al. 2008a; Wursig et al. 1998). Thus, aircraft flying at low altitude, at close lateral distances and above shallow water elicit stronger responses than aircraft flying higher, at greater lateral distances and over deep water (Patenaude et al. 2002; Smultea et al. 2008a). Routine OCS helicopter traffic would not be expected to disturb animals for extended periods, provided pilots do not alter their flight patterns to more closely observe or photograph marine mammals. Helicopters, while flying offshore, generally maintain altitudes above 700 feet during transit to and from a working area, and at an altitude of about 500 feet between platforms. The duration of the effects resulting from a startle response is expected to be short-term during routine flights, and the potential effects will be insignificant to sperm whales and Rice's whales. Therefore, we find that any disturbance that

may result from aircraft associated with the proposed action is not likely to adversely affect ESA-listed whales.

Drilling and production noise would contribute to increases in the ambient noise environment of the GOM, but they are not expected in amplitudes sufficient to cause either hearing or behavioral impacts (BOEM 2017-009). There is the possibility of short-term disruption of movement patterns and/or behavior caused by vessel noise and disturbance; however, these are not expected to impact survival and growth of any marine mammal populations in the GOM. Additionally, the National Marine Fisheries Service published a final recovery plan for the sperm whale, which identified anthropogenic noise as either a low or unknown threat to sperm whales in the GOM (USDOC, NMFS, 2010b). Sirenians (i.e., manatees) are not located within the area of operations. Additionally, there were no specific noise impact factors identified in the latest BOEM environmental impact statement for sirenians related to GOM OCS operations (BOEM 2017-009). See **Item 20.1** for details on the Rice's whale.

Impulsive sound impacts (i.e., pile driving, seismic surveys) are not included among the activities proposed under this plan

Effluents: Drilling fluids and cuttings discharges contain components which may be detrimental to marine mammals. Most operational discharges are diluted and dispersed upon release. Any potential impact from drilling fluids would be indirect, either as a result of impacts on prey items or possibly through ingestion in the food chain (API, 1989).

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, 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 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 also 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.

Accidents: Collisions between support vessels and marine mammals, including 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 of 500 meters or greater from baleen whales, 100 meters or greater from sperm whales, and a distance of 50 meters or greater from all other aquatic protected species, with the exception of animals that approach the vessel. If unable to identify the marine mammal, the vessel will act as if it were a baleen whale and maintain a distance of 500 meters or greater. If a manatee is sighted, all vessels in the area will operate at “no wake/idle” speeds in the area, while maintaining proper distance. When assemblages of cetaceans are observed, including mother/calf pairs, vessel speeds will be reduced to 10 knots or less. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico Outer Continental Shelf (OCS).

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion 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.

These proposed operations may utilize a moon pool(s) to conduct various subsea activities. Details on moon pool descriptions, operations, monitoring, and reporting for potential observations and interactions with marine mammals are included in **Appendix I** of the Plan. LLOG will contact NMFS at nmfs.psoreview@noaa.gov and BSEE at protectedspecies@bsee.gov and 985-722-7902 for additional guidance and incident report information as indicated in **Appendix I** of the Plan.

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 impact cetacean behavior and/or distribution, thereby causing additional stress to the animals. The effect of oil dispersants on cetaceans is not known. Removing oil from the surface would reduce the likelihood of oil adhering to marine mammals. Laboratory experiments have shown that the dispersants used during the Deepwater Horizon response are cytotoxic to sperm whale cells; however, it is difficult to determine actual exposure levels in the GOM. Therefore, dispersants will only be used if approved by the Regional Response Team in coordination with the RRT Dispersant Plan and RRT Biological Assessment for Dispersants. The acute toxicity of oil dispersant chemicals included in LLOG'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's OSRP (refer to information submitted in accordance with **Appendix H**).

The NMFS Office of Protected Resources coordinates agency assessment of the need for response and leads response efforts for spills that may impact cetaceans. If a spill may impact cetaceans, NMFS Protected Resources Contacts should be notified (see contact details below), and they will initiate notification of other relevant parties.

NMFS Protected Resources Contacts for the Gulf of Mexico:

- Marine mammals – Southeast emergency stranding hotline 1-877-433-8299
- Other endangered or threatened species – ESA section 7 consulting biologist: nmfs.ser.emergency.consult@noaa.gov

There are no other IPFs (including physical disturbances to the seafloor) from the Proposed Operations that are likely to impact marine mammals.

8. Sea Turtles

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; Lohofener et al., 1990). Deep waters may be used by all species as a transitory habitat. A complete list of endangered and threatened sea turtles in the GOM may be found in **Table 1** at the beginning of this Environmental Impact Assessment. Additional details regarding the loggerhead sea turtle's critical habitat in the GOM are located in **Item 20.5**. Potential IPFs to sea turtles as a result of the Proposed Operations include emissions (noise / sound), effluents, discarded trash and debris, and accidents.

Emissions (noise / sound): Noise from drilling activities, support vessels, and helicopters (i.e., non-impulsive anthropogenic sound) may elicit a startle reaction from sea turtles, but this is a

temporary disturbance. Responses to sound exposure may include lethal or nonlethal injury, temporary hearing impairment, behavioral harassment and stress, or no apparent response. Vessels are the greatest contributors to increases in low-frequency ambient sound in the sea (Andrew et al. 2011). Sound levels and tones produced are generally related to vessel size and speed. Larger vessels generally emit more sound than smaller vessels, and vessels underway with a full load, or those pushing or towing a load, are noisier than unladen vessels. Routine OCS helicopter traffic would not be expected to disturb animals for extended periods, provided pilots do not alter their flight patterns to more closely observe or photograph marine mammals. Helicopters, while flying offshore, generally maintain altitudes above 700 feet during transit to and from a working area, and at an altitude of about 500 feet between platforms. The duration of the effects resulting from a startle response is expected to be short-term during routine flights and the potential effects will be insignificant to sea turtles. Therefore, we find that any disturbance that may result from aircraft associated with the proposed action is not likely to adversely affect sea turtles. Construction and operational sounds other than pile driving should have insignificant effects on sea turtles; effects would be limited to short-term avoidance of construction activity itself rather than the sound produced. As a result, sound sources associated with support vessel movement as part of the Proposed Operations are insignificant and therefore are not likely to adversely affect sea turtles.

Overall noise impacts on sea turtles from the proposed activities are expected to be negligible to minor depending on the location of the animal(s) relative to the sound source and the frequency, intensity, and duration of the source. The National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion Appendix C explains how operators must implement measures to minimize the risk of vessel strikes to protected species and report observations of injured or dead protected species. This guidance should also minimize the chance of sea turtles being subject to the increased noise level of a service vessel in very close proximity.

Effluents: Drilling fluids and cuttings discharges are not known to be lethal to sea turtles. Most operational discharges are diluted and dispersed upon release. Any potential impact from drilling fluids would be indirect, either as a result of impacts on prey items or possibly through ingestion in the food chain (API, 1989).

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, 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 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 also 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.

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 of 50 meters or greater when they are sighted, with the exception of sea turtles that approach the vessel. 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 as well as other marine protected species (i.e., Endangered Species Act listed species). Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion 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 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). 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.

These proposed operations may utilize a moon pool(s) to conduct various subsea activities. Details on moon pool descriptions, operations, monitoring, and reporting for potential observations and interactions with marine mammals are included in **Appendix I** of the Plan. LLOG will contact NMFS at nmfs.psoreview@noaa.gov and BSEE at protectedspecies@bsee.gov and 985-722-7902 for additional guidance and incident report information as indicated in **Appendix I** of the Plan.

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's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix H**).

The NMFS Office of Protected Resources coordinates agency assessment of the need for response and leads response efforts for spills that may impact sea turtles. If a spill may impact sea turtles, the following NMFS Protected Resources Contacts should be notified, and they will initiate notification of other relevant parties.

- Dr. Brian Stacy at brian.stacy@noaa.gov and 352-283-3370 (cell); or
- Stacy Hargrove at stacy.hargrove@noaa.gov and 305-781-7453 (cell)

There are no other IPFs (including physical disturbances to the seafloor) from the Proposed Operations that are likely to impact sea turtles.

9. Air Quality

Potential IPFs to air quality as a result of the Proposed Operations include accidents.

The projected air emissions identified in **Appendix G** are not expected to affect the OCS air quality primarily due to distance to the shore or to any Prevention of Significant Deterioration Class I air quality area such as the Breton Wilderness Area. Keathley Canyon Blocks 828, 829 and 872 are beyond the 200-kilometer (124 mile) buffer for the Breton Wilderness Area and are 212 miles from the coastline. Therefore, no special mitigation, monitoring, or reporting requirements apply with respect to air emissions.

Accidents and blowouts can release hydrocarbons or chemicals, which could cause the emission of air pollutants. However, these releases should not impact onshore air quality because of the prevailing atmospheric conditions, emission height, emission rates, and the distance of Keathley Canyon Blocks 828, 829 and 872 from the coastline.

There are no other IPFs (including effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact air quality.

10. Shipwreck Sites (known or potential)

In accordance with BOEM NTL 2005-G07, LLOG will submit an archaeological resource report per 30 CFR 550.194 if directed to do so by the Regional Director.

Potential IPFs to known or unknown shipwreck sites as a result of the Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 include physical disturbances to the seafloor and accidents.

Physical disturbances to the seafloor: A Drillship or semi-submersible rig is 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 by the use of a Drillship or semi-submersible rig, LLOG's Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 that are likely to impact shipwreck sites.

Additionally, Keathley Canyon Blocks 828, 829 and 872 is not located in or adjacent to an OCS block designated by BOEM as having a high probability for occurrence of shipwrecks. Should LLOG discover any evidence of a shipwreck, they will immediately halt operations within a 1000-foot radius, report to BOEM within 48 hours, 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 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's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix H**).

There are no other IPFs (including emissions, effluents, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact shipwreck sites.

11. Prehistoric Archaeological Sites

In accordance with BOEM NTL 2005-G07, LLOG will submit an archaeological resource report per 30 CFR 550.194 if directed to do so by the Regional Director.

Potential IPFs to prehistoric archaeological sites as a result of the Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 include disturbances to the seafloor and accidents. Keathley Canyon Blocks 828, 829 and 872 are located outside the Archaeological Prehistoric high probability line, therefore, no adverse impacts are expected. Should LLOG discover any object of prehistoric archaeological significance, they will immediately halt operations within a 1000-foot radius, report to BOEM within 48 hours, and make every reasonable effort to preserve and protect that cultural resource.

Physical disturbances to the seafloor: A Drillship or semi-submersible rig is 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 by the use of a Drillship or semi-submersible rig, LLOG's Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 are not likely to cause impacts to prehistoric archaeological sites.

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's Regional Oil Spill Response Plan (refer to information submitted in accordance with **Appendix H**).

There are no other IPFs (including emissions, effluents, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact prehistoric archeological sites.

Vicinity of Offshore Location

12. Essential Fish Habitat (EFH)

Potential IPFs to EFH as a result of the Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 include physical disturbances to the seafloor, effluents, and accidents. EFH includes all estuarine and marine waters and substrates in the Gulf of Mexico.

Physical disturbances to the seafloor: Turbidity and sedimentation resulting from the bottom disturbing activities included in the Proposed Operations would be short term and localized. Fish are mobile and would avoid these temporarily suspended sediments. Additionally, the Live Bottom Low Relief Stipulation, the Live Bottom (Pinnacle Trend) Stipulation, and the Eastern Gulf Pinnacle Trend Stipulation have been put in place to minimize the impacts of bottom disturbing activities. Additionally, a Drillship or semi-submersible rig is being used for the proposed activities; therefore, only an insignificant amount of seafloor will be disturbed. Therefore, the bottom disturbing activities from the Proposed Operations would have a negligible impact on EFH.

Effluents: 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 operational waste discharges. Levels of contaminants in drilling muds and cuttings and produced-water discharges, discharge-rate restrictions, and monitoring and toxicity testing are regulated by the EPA NPDES permit, thereby eliminating many significant biological or ecological effects. Operational discharges are not expected to cause significant adverse impacts to EFH.

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's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact essential fish habitat.

13. Marine and Pelagic Birds

Potential IPFs to marine birds as a result of the proposed activities include emissions (air, noise / sound), accidental oil spills, and discarded trash and debris from vessels and the facilities.

Emissions:

Air Emissions

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

Noise / Sound Emissions

The OCS oil-and gas-related helicopters and vessels have the potential to cause noise and disturbance. However, flight altitude restrictions over sensitive habitat, including that of birds, may make serious disturbance unlikely. Birds are also known to habituate to noises, including airport noise. It is an assumption that the OCS oil-and gas-related vessel traffic would follow regular routes; if so, seabirds would find the noise to be familiar. Therefore, the impact of OCS oil-and gas-related noise from helicopters and vessels to birds would be expected to be negligible.

The use of explosives for decommissioning activities may potentially kill one or more birds from barotrauma if a bird (or several birds because birds may occur in a flock) is present at the location of the severance. For the impact of underwater sound, a threshold of 202 dB sound exposure level (SEL) for injury and 208 dB SEL for barotrauma was recommended for the *Brahyramphus marmoratus*, a diving seabird (USDOJ, FWS, 2011). However, the use of explosive severance of facilities for decommissioning are not included in these Proposed Operations, therefore these impacts are not expected.

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's Regional OSRP (refer to information submitted in **Appendix H**).

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, 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 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 also 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. Debris, if any, from these proposed activities will seldom interact with marine and pelagic birds; therefore, the effects will be negligible.

ESA bird species: Seven species found in the GOM are listed under the ESA. BOEM consults on these species and requires mitigations that would decrease the potential for greater impacts due to small population size.

There are no other IPFs (including effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact marine and pelagic birds.

14. Public Health and Safety Due to Accidents.

There are no IPFs (including emissions, effluents, physical disturbances to the seafloor, wastes sent to shore for treatment or disposal, and accidents, including an accidental H₂S release) from the proposed activities that are likely to impact 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 Operations be classified by BSEE as H₂S absent.

Coastal and Onshore

15. Beaches

Potential IPFs to beaches from the Proposed Operations include accidents 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 (212 miles) and the response capabilities that would be implemented, no significant adverse impacts are expected. The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

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, 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 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 also 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.

There are no other IPFs (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact beaches.

16. Wetlands

Potential IPFs to wetlands from the Proposed Operations include accidents and discarded trash and debris.

Accidents: 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 (212 miles) and the response capabilities that would be implemented, no impacts are expected. The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

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, 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 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 also 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.

There are no other IPFs (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact wetlands.

17. Shore Birds and Coastal Nesting Birds

Potential IPFs to shore birds and coastal nesting birds as a result of the Proposed Operations include accidents and discarded trash and debris.

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 (212 miles) and the response capabilities that would be implemented, no impacts are expected. The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: Shore birds and coastal nesting 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, 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 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 also collect and remove flotsam resulting from activities related to Proposed Operations.

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 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 (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact shore birds and coastal nesting birds.

18. Coastal Wildlife Refuges

Potential IPFs to coastal wildlife refuges as a result of the Proposed Operations include accidents and discarded trash and debris.

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 (212 miles) and the response capabilities that would be implemented, no impacts are expected. The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

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 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 also collect and remove flotsam resulting from activities related to Proposed Operations.

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 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 (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact coastal wildlife refuges.

19. Wilderness Areas

Potential IPFs to wilderness areas as a result of the Proposed Operations include accidents and discarded trash and debris.

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 Operations (refer to **Item 5**, Water Quality). Due to the distance from the nearest designated Wilderness Area (289.9 miles, 288.1 miles and 292.3 miles, respectively) and the response capabilities that would be implemented, no significant adverse impacts are expected. The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

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 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 also collect and remove flotsam resulting from activities related to Proposed Operations.

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 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 (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact wilderness areas.

20. Other Environmental Resources Identified

20.1 – Rice’s Whale (née Gulf of Mexico Bryde’s Whale)

The Bryde’s whale, also known as the Bryde’s whale complex, is a collection of baleen whales that are still being researched to determine if they are the same species or if they are individual species of whales. In 2021, the Rice’s whale, formerly known as the Gulf of Mexico Bryde’s whale, was determined to be a separate species from other Bryde’s whales. There are less than 100 Rice’s whales living in the Gulf of Mexico year-round. These whales retain all the protections of the Gulf of Mexico Bryde’s whale under the Endangered Species Act while the regulations are being updated to reflect the name change.

The Rice’s whale (née Gulf of Mexico Bryde’s whale) is the only commonly occurring baleen whale in the northern Gulf of Mexico and has been sighted off western Florida and in the De Soto Canyon region. The Rice’s whale area is over 315.5 miles, 314.2 miles and 318.5 miles, respectively from the Proposed Operations. Additionally, vessel traffic associated with the Proposed Operations will not flow through the Rice’s whale area. Therefore, there are no IPFs from the Proposed Operations that are likely to impact the Rice’s whale. Additional information on marine mammals may be found in **Item 7**.

20.2 – Gulf Sturgeon

The Gulf sturgeon resides primarily in inland estuaries and rivers from Louisiana to Florida and a small population of the species enters the Gulf of Mexico seasonally in western Florida. Potential IPFs to the Gulf sturgeon from the Proposed Operations include accidents, emissions (noise / sound), and discarded trash and debris. Additional information on ESA-listed fish may be found in **Item 6**.

Accidents: Collisions between support vessels and the Gulf sturgeon would be unusual events; however, should one occur, death or injury to the Gulf sturgeon is possible. Contract vessel operators can avoid protected aquatic species and reduce potential deaths by maintaining a vigilant watch and a distance of 50 meters or greater, with the exception of animals that approach the vessel. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico Outer Continental Shelf (OCS).

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion 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.

Should an ESA-listed fish (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) be entrapped, entangled, or injured, personnel should contact the ESA Section 7 biologist at (301) 427-8413 (nmfs.psoreview@noaa.gov) and report all incidents to takereport.nmfsser@noaa.gov.

After making the appropriate notifications, LLOG may call BSEE at (985) 722-7902 for questions or additional guidance on recovery assistance needs, continued monitoring requirements, and incidental report information which at minimum is detailed below. 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.nmfsser@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.

Due to the distance from the nearest identified Gulf sturgeon critical habitat (292.7 miles, 291.4 miles and 295.4 miles, respectively) and the response capabilities that would be implemented during a spill, no significant adverse impacts are expected to the Gulf sturgeon. Considering the information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, the location of this critical habitat in relation to Proposed Operations, the likely dilution of oil reaching nearshore areas, and the on-going weathering and dispersal of oil over time, we do not anticipate the effects from oil spills will appreciably diminish the value of Gulf sturgeon designated critical habitat for the conservation of the species. The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Emissions (noise / sound): All routine OCS oil-and gas-related activities have some element of sound generation. Common sound sources include propeller cavitation, rotating machinery, and reciprocating machinery, which are associated with routine OCS oil-and gas-related activities such as vessel traffic, drilling, construction, and oil and gas production, processing, and transport. Sound introduced into the marine environment as a result of human activities has the potential to affect marine organisms. The National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion found that construction and operational sounds other than pile driving will have insignificant effects on Gulf sturgeon (NMFS, 2020). There are no pile driving activities associated with the Proposed Operations, therefore noise impacts are not expected to significantly affect Gulf sturgeon

Discarded trash and debris: Trash and debris are not expected to impact the Gulf sturgeon. 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, 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 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 also 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.

There are no other IPFs (including effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact the Gulf sturgeon.

20.3 – Oceanic Whitetip Shark

Oceanic whitetip sharks may be found in tropical and subtropical waters around the world, including the Gulf of Mexico (Young 2016). According to the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, Essential Fish Habitat (EFH) for the oceanic whitetip shark includes localized areas in the central Gulf of Mexico and Florida Keys. Oceanic whitetip sharks were listed as threatened under the Endangered Species Act in 2018 due to worldwide overfishing. Oceanic whitetip sharks had an abundant worldwide population, which has been threatened in recent years by inadequate regulatory measures governing fisheries; therefore, there is little research regarding the impact of oil and gas operations on oceanic whitetip sharks (NMFS, 2020). IPFs that have been determined by NMFS to be discountable to oceanic whitetip sharks include vessel strike, emissions (noise / sound), discharges, entanglement and entrapment, and marine debris. Potential IPFs to oceanic whitetip sharks as a result of the Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 include accidents. Additional information on ESA-listed fish may be found in **Item 6**.

Accidents: Collisions between support vessels and the oceanic whitetip shark would be unusual events, however, should one occur, death or injury to the oceanic whitetip shark is possible. Contract vessel operators can avoid protected aquatic species and reduce potential deaths by maintaining a vigilant watch and a distance of 50 meters or greater, with the exception of animals that approach the vessel. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico Outer Continental Shelf (OCS).

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion 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.

Should an ESA-listed fish (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) be entrapped, entangled, or injured, personnel should contact the ESA Section 7 biologist at (301) 427-8413 (nmfs.psoreview@noaa.gov) and report all incidents to takereport.nmfsser@noaa.gov. After making the appropriate notifications, LLOG may call BSEE at (985) 722-7902 for questions or additional guidance on recovery assistance needs, continued monitoring requirements, and incidental report information which at minimum is detailed below. 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.nmfsser@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.

There is little information available on the impacts of oil spills or dispersants on oceanic whitetip sharks. It is expected that exposure of oil or dispersants to oceanic whitetip sharks would likely result in effects similar to other marine species, including fitness reduction and the possibility of mortality (NMFS, 2020). Due to the sparse population in the Gulf of Mexico, it is possible that a small number of oceanic whitetip sharks could be impacted by an oil spill. However, it is unlikely that such an event would occur from the proposed activities (refer to **Item 5**, Water Quality). The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: There is little available information on the effects of marine debris on oceanic whitetip sharks. Since these sharks are normally associated with surface waters, they may be susceptible to entanglement. However, due to the small, widely dispersed, and highly mobile population in the Gulf of Mexico, and the localized and patchy distribution of marine debris, it is extremely unlikely that oceanic whitetip sharks would be impacted by marine 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, 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 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 also 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.

There are no IPFs (including effluents, physical disturbances to the seafloor, and wastes sent to shore for treatment or disposal) from the Proposed Operations that are likely to impact oceanic whitetip sharks.

20.4 – Giant Manta Ray

According to the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, the giant manta ray lives in tropical, subtropical, and temperate oceanic waters and productive coastlines throughout the Gulf of Mexico. While uncommon in the Gulf of Mexico, there is a population of approximately 70 giant manta rays in the Flower Garden Banks National Marine Sanctuary (Miller and Klimovich 2017). Giant manta rays were listed as threatened under the Endangered Species Act in 2018 due to worldwide overfishing. Giant manta rays had an abundant worldwide population, which has been threatened in recent years by inadequate regulatory measures governing fisheries; therefore, there is little research regarding the impact of oil and gas operations on giant manta rays (NMFS, 2020). IPFs that have been determined by NMFS to be discountable to giant manta rays include vessel strike, emissions (noise / sound), discharges, entanglement and entrapment, and marine debris. Potential IPFs to giant manta rays as a result of the Proposed Operations in Keathley Canyon Blocks 828, 829 and 872 include accidents. Additional information on ESA-listed fish may be found in **Item 6**.

Accidents: Collisions between support vessels and the giant manta ray would be unusual events, however, should one occur, death or injury to the giant manta ray is possible. Contract vessel operators can avoid protected aquatic species and reduce potential deaths by maintaining a vigilant watch and a distance of 50 meters or greater, with the exception of animals that approach the vessel. Vessel personnel should use a Gulf of Mexico reference guide that includes identifying information on marine mammals, sea turtles, and other marine protected species (i.e., Endangered

Species Act listed species such as Gulf sturgeon, giant manta ray, or oceanic whitetip shark) that may be encountered in the Gulf of Mexico Outer Continental Shelf (OCS).

Contract vessel operators will comply with the measures included in Appendix C of the NMFS Biological Opinion 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.

Should an ESA-listed fish (e.g., giant manta ray, oceanic whitetip shark, or Gulf sturgeon) be entrapped, entangled, or injured, personnel should contact the ESA Section 7 biologist at (301) 427-8413 (nmfs.psoreview@noaa.gov) and report all incidents to takereport.nmfs@noaa.gov. After making the appropriate notifications, LLOG may call BSEE at (985) 722-7902 for questions or additional guidance on recovery assistance needs, continued monitoring requirements, and incidental report information which at minimum is detailed below. 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.

There is little information available on the impacts of oil spills or dispersants on giant manta rays. It is expected that exposure of oil or dispersants to giant manta rays would likely result in effects similar to other marine species, including fitness reduction and the possibility of mortality (NMFS, 2020). It is possible that a small number of giant manta rays could be impacted by an oil spill in the Gulf of Mexico. However, due to the distance to the Flower Garden Banks (120.7 miles, 121.3 miles and 123.8 miles, respectively), the low population dispersed throughout the Gulf of Mexico, and the response capabilities that would be implemented during a spill, no significant adverse impacts are expected to impact giant manta rays. Additionally, it is unlikely that such an event would occur from the proposed activities (refer to **Item 5**, Water Quality). The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

Discarded trash and debris: There is little available information on the effects of marine debris on giant manta rays. Since these sharks are normally associated with surface waters, they may be susceptible to entanglement. However, due to the small, widely dispersed, and highly mobile population in the Gulf of Mexico, and the localized and patchy distribution of marine debris, it is extremely unlikely that oceanic whitetip sharks would be impacted by marine 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, 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 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 also 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.

There are no other IPFs (including effluents, physical disturbances to the seafloor, and wastes sent to shore for disposal) from the Proposed Operations that are likely to impact giant manta rays.

20.5 – Loggerhead Sea Turtle

The loggerhead sea turtles are large sea turtles that inhabit continental shelf and estuarine environments throughout the temperate and tropical regions of the Atlantic Ocean, with nesting beaches along the northern and western Gulf of Mexico. NMFS issued a Final Rule in 2014 (79 FR 39855) designating a critical habitat including 38 marine areas within the Northwest Atlantic Ocean, with seven of those areas residing within the Gulf of Mexico. These areas contain one or a combination of habitat types: nearshore reproductive habitats, winter areas, breeding areas, constricted migratory corridors, and/or *Sargassum* habitats.

There are multiple IPFs that may impact loggerhead sea turtles (see **Item 8**). However, the closest loggerhead critical habitat is located 349 miles, 347.5 miles and 351.6 miles, respectively from Keathley Canyon Blocks 828, 829 and 872; therefore, no adverse impacts are expected to the critical habitat. Additionally, considering the information from the National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion, we do not expect Proposed Operations to affect the ability of *Sargassum* to support adequate prey abundance and cover for loggerhead turtles.

20.6 - Protected Corals

Protected coral habitats in the Gulf of Mexico range from Florida, the Flower Garden Banks National Marine Sanctuary, and into the Caribbean, including Puerto Rico, the U.S. Virgin Islands, and Navassa Island. Four counties in Florida (Palm Beach, Broward, Miami-Dade, and Monroe Counties) were designated as critical habitats for elkhorn (*Acropora palmata*) and staghorn (*Acropora cervicornis*) corals. These coral habitats are located outside of the planning area and are not expected to be impacted by the proposed actions. Elkhorn coral can also be found in the Flower Garden Banks along with three additional coral species, boulder star coral (*Orbicella franksi*), lobed star coral (*Orbicella annularis*), and mountainous star coral (*Orbicella faveolata*). Potential IPFs to protected corals from the Proposed Operations include accidents.

Accidents: It is unlikely that an accidental surface or subsurface spill would occur from the Proposed Operations (refer to statistics in **Item 5**, Water Quality). Oil spills cause damage to corals only if the oil contacts the organisms. Due to the distance from the Flower Garden Banks (120.7 miles, 121.3 miles and 123.8 miles, respectively) and other critical coral habitats, no adverse impacts are expected. The operations proposed in this plan will be covered by LLOG's Regional OSRP (refer to information submitted in **Appendix H**).

There are no other IPFs (including emissions, effluents, physical disturbances to the seafloor, and wastes sent to shore for disposal) from the Proposed Operations that are likely to impact protected corals.

20.7 - Endangered Beach Mice

There are four subspecies of endangered beach mouse that are found in the dune systems along parts of Alabama and northwest Florida. Due to the location of Keathley Canyon Blocks 828, 829 and 872 and the beach mouse critical habitat (above the intertidal zone), there are no IPFs that are likely to impact endangered beach mice.

20.8 - Navigation

The current system of navigation channels around the northern GOM is believed to be generally adequate to accommodate traffic generated by the future Gulfwide OCS Program. As exploration and development activities increase on deepwater leases in the GOM, port channels may need to be expanded to accommodate vessels with deeper drafts and longer ranges. However, current navigation channels will not be changed, and new channels will not be required as a result of the operations proposed in this plan.

(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 Operations 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, Keathley Canyon Blocks 828, 829 and 872 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. Drilling & completion
 - a. Secure well
 - b. Secure rig / platform
 - c. Evacuate personnel

Drilling activities will be conducted in accordance with NTL No.'s 2008-G09, 2009-G10, and 2010-N10.

2. Structure Installation
Operator will not conduct structure installation operations during Tropical Storm or Hurricane threat.

(E) ALTERNATIVES

No alternatives to the Proposed Operations 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 Operations. Therefore, a list of such entities has not been provided.

(H) PREPARER(S)

Audrey Montalbano
J. Connor Consulting, Inc.
19219 Katy Freeway, Suite 200
Houston, Texas 77094

281-578-3388

Audrey.montalbanol@jccteam.com

(I) REFERENCES

Authors:

ABS Consulting Inc. 2016. 2016 Update of Occurrence Rates for Offshore Oil Spills. July 13, 2016. Contract #E15PX00045, Deliverable 7 (ABS, 2016)

Adcroft, A., R. Hallberg, J.P. Dunne, B.L. Samuels, J. A. Galt, C.H. Barker, and B. Payton. 2010. Simulations of underwater plumes of dissolved oil in the Gulf of Mexico. *Geophysical Research Letters*, Vol. 37, L18605, 5 pp. doi: 10.1029/2010GL044689. (Adcroft et al., 2010)

American Petroleum Institute (API). 1989. Effects of offshore petroleum operations on cold water marine mammals: a literature review. Washington, DC: American Petroleum Institute. 385 pp.

Andrew, R. K., B. M. Howe, and J. A. Mercer. 2011. Long-time trends in ship traffic noise for four sites off the North American West Coast. *Journal of the Acoustical Society of America* 129(2):642-651.

Balazs, G.H. 1985. Impact of ocean debris on marine turtles: entanglement and ingestion. In: Shomura, R.S. and H.O. Yoshida, eds. *Proceedings, Workshop on the Fate and Impact of Marine Debris*, 26-29 November 1984, Honolulu, HI. U.S. Dept. of Commerce. NOAA Tech. Memo. NOAA-TM-NMFS-SWFC-54. Pp 387-429.

Burke, C.J. and J.A. Veil. 1995. Potential benefits from regulatory consideration of synthetic drilling muds. Environmental Assessment Division, Argonne National Laboratory, ANL/EAD/TM-43.

Catastrophic Spill Event Analysis: High-Volume, Extended-Duration Oil Spill Resulting from Loss of Well Control on the Gulf of Mexico Outer Continental Shelf, 1st Revision (BOEM 2017-007)

Daly, J.M. 1997. Controlling the discharge of synthetic-based drilling fluid contaminated cuttings in waters of the United States. U.S. Environmental Protection Agency, Office of Water. Work Plan, June 24, 1997.

Engås, A., S. Løkkeborg, E. Ona, and A.V. Soldal. 1996. Effects of seismic shooting on local abundance and catch rates of cod (*Gadus morhua*) and haddock (*Melanogrammus aeglefinus*). *Canadian Journal of Fisheries and Aquatic Science* 53:2238-2249 (Engås et al., 1996)

GOM Deepwater Operations and Activities. Environmental Assessment. BOEM 2000-001.

- Gulf of Mexico OCS Oil & Gas Lease Sales: 2017-2022, Gulf of Mexico Lease Sales 249, 250, 251, 252, 253, 254, 256, 257, 259, and 261, Final Multisale Environmental Impact Statement. (BOEM 2017-009)
- Gulf of Mexico OCS Oil and Gas Lease Sales 259 and 261: Final Supplemental Environmental Impact Statement. (BOEM 2023-001)
- Haddad, R. and S. Murawski. 2010. Analysis of hydrocarbons in samples provided from the cruise of the R/V Weatherbird II, May 23-26, 2010. U.S. Dept. of Commerce, National Oceanographic and Atmospheric Administration, Silver Spring, MD. 14 pp. (Haddad and Murawski, 2010)
- Hansen, D.J. 1981. The relative sensitivity of seabird populations in Alaska to oil pollution. U.S. Dept. of the Interior, Bureau of Land Management, Alaska OCS Region, Anchorage. BLM-YK-ES-81-006-1792.
- Hildebrand, J.A. 2009. Anthropogenic and natural sources of ambient noise in the ocean. *Marine Ecology Progress Series* 395:5-20. Internet website: <http://www.int-res.com/articles/theme/m395p005.pdf>. (Hildebrand, 2009)
- Joint Analysis Group. 2010. Review of R/V Brooks McCall data to examine subsurface oil. 58 pp. (Joint Analysis Group, 2010)
- Ladich, F. 2013. Effects of noise on sound detection and acoustic communication in fishes. In: Brumm, H., ed. *Animal communication and noise*. Berlin Heidelberg: Springer-Verlag. Pp. 65- (Ladich, 2013)
- Laist, D.W. 1997. Impacts of marine debris: entanglement of marine life in marine debris including a comprehensive list of species with entanglement and ingestion records. In: Coe, J.M. and D.B. Rogers, eds. *Marine debris: sources, impacts, and solutions*. New York, NY: Springer-Verlag. Pp. 99-139.
- Lee, K., T. Nedwed, R. C. Prince, and D. Palandro. 2013a. Lab tests on the biodegradation of chemically dispersed oil should consider the rapid dilution that occurs at sea. *Marine Pollution Bulletin* 73(1):314-318. DOI: 10.1016/j.marpolbul.2013.06.005. (Lee et al., 2013a)
- Lee, K., M. Boufadel, B. Chen, J. Foght, P. Hodson, S. Swanson, and A. Venosa. 2015. *The Behaviour and Environmental Impacts of Crude Oil Released into Aqueous Environments*. <https://www.cepa.com/wp-content/uploads/2014/01/OIWRreport.compressed.pdf>. (Lee et al., 2015)
- Lewis, A. and D. Aurand. 1997. Putting dispersants to work: Overcoming obstacles. 1997 International Oil Spill Conference. API 4652A. Technical Report IOSC-004. (Lewis and Aurand, 1997)

- Løkkeborg, S., E. Ona, A. Vold, and A. Salthaug. 2012. Sounds from seismic air guns: gear-and species specific effects on catch rates and fish distribution. *Canadian Journal of Fisheries and Aquatic Sciences* 69:1,278-1,291. (Løkkeborg et al., 2012)
- Lubchenco, J., M. McNutt, B. Lehr, M. Sogge, M. Miller, S. Hammond, and W. Conner. 2010. BP Deepwater Horizon oil budget: What happened to the oil? 5 pp. (Lubchenco et al. 2010)
- Luksenburg, J. and E. Parsons, 2009. The effects of aircraft on cetaceans: implications for aerial whale watching. *Proceedings of the 61st Meeting of the International Whaling Commission*.
- Majors, A.P. and A.C. Myrick, Jr. 1990. Effects of noise on animals: implications for dolphins exposed to seal bombs in the eastern tropical Pacific purse-seine fishery—an annotated bibliography. NOAA Administrative Report LJ-90-06.
- Marine Mammal Commission. 1999. Annual report to Congress – 1998.
- McAuliffe, C.D., B.L. Steelman, W.R. Leek, D.F. Fitzgerald, J. P. Ray, and C.D. Barker. 1981. The 1979 southern California dispersant treated research oil spills. In: *Proceedings 1981 Oil Spill Conference*. March 2-5, 1981, Atlanta, GA. Washington, DC: American Petroleum Institute. Pp. 269-282. (McAuliffe et al, 1981)
- McKenna, M.F., D. Ross, S.M. Wiggins, and J.A. Hildebrand. 2012. Underwater radiated noise from modern commercial ships. *Journal of the Acoustical Society of America* 131(1):92-103. (McKenna et al., 2012)
- Miller, M. H., and C. Klimovich. 2017. Endangered Species Act Status Review Report: Giant Manta Ray (*Manta birostris*) and Reef Manta Ray (*Manta alfredi*). NMFS.
- National Academies of Sciences, Engineering, and Medicine 2020. *The Use of Dispersants in Marine Oil Spill Response*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25161>. (NAS 2020)
- National Marine Fisheries Service Endangered Species Act (ESA) Section 7 Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico (NMFS, 2020)
- NMFS. 2017b. Biological and Conference Opinion on the Issuance of Permit No. 20465 to NMFS Alaska Fisheries Science Center Marine Mammal Laboratory for Research on Cetaceans. Office of Protected Resources, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce, FPR-2017-9186, Silver Spring, Maryland.
- NMFS. 2017f. Letter of concurrence on the issuance of Permit No. 20527 to Ann Pabst for vessel and aerial surveys of blue, fin, North Atlantic right, sei, and sperm whales. Office of Protected Resources, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce, FPR-2017-9199, Silver Spring, Maryland.

- NRC. 2005. Oil Spill Dispersants: Efficacy and Effects. Washington, DC: The National Academies Press. (NRC, 2005)
- Patenaude, N. J., W. J. Richardson, M. A. Smultea, W. R. Koski, G. W. Miller, B. Wursig, and C. R. Greene. 2002. Aircraft sound and disturbance to bowhead and beluga whales during spring migration in the Alaskan Beaufort Sea. *Marine Mammal Science* 18(2):309-335.
- Piatt, J.F., C.J. Lensink, W. Butler, M. Kendziorek, and D.R. Nysewander. 1990. Immediate impact of the Exxon Valdez oil spill on marine birds. *The Auk*. 107 (2): 387-397.
- Popper, A.N., R.R. Fay, C. Platt, and O. Sand. 2003. Sound detection mechanisms and capabilities of teleost fishes. In: Collin, S.P. and N.J. Marshall, eds. *Sensory processing in aquatic environments*. New York, NY: Springer-Verlag. Pp. 3-3 (Popper et al., 2003)
- Popper, A.N., M.E. Smith, P.A. Cott, B.W. Hanna, A.O. MacGillivray, M.E. Austin, and D.A. Mann. 2005. Effects of exposure to seismic airgun use on hearing of three fish species. *Journal of the Acoustical Society of America* 117(6):3958-3971. (Popper et al., 2005)
- Popper, A.N., A.D. Hawkins, R.R. Fay, D.A. Mann, S. Bartol, T.J. Carlson, S. Coombs, W.T. Ellison, R. Gentry, M.B. Halvorsen, S. Lokkeborg, P. Rogers, B.L. Southall, D.G. Zeddies, and W.N. Tavalga. 2014. ASA S3/SC1. 4 TR -2014 sound exposure guidelines for fishes and sea turtles. A technical report prepared by ANSI-Accredited Standards Committee S3/SC1 and Registered with ANSI. New York, NY: Springer. 78 pp. (Popper et al., 2014)
- Popper, A.N. and M.C. Hastings. 2009. Effects of anthropogenic sources of sound on fishes. *Journal of Fish Biology* 75:455-498 (Popper and Hastings, 2009)
- Radford, A.N., E. Kerridge, and S.D. Simpson. 2014. Acoustic communication in a noisy world: Can fish compete with anthropogenic noise? *Behavioral Ecology* 00(00):1-9. doi:10.1093/beheco/aru029 (Radford et al., 2014)
- Richter, C., S. Dawson, and E. Slooten. 2006. Impacts of commercial whale watching on male sperm whales at Kaikoura, New Zealand. *Marine Mammal Science* 22(1):46-63. (Richter et al. 2006)
- Silva, M., P.J. Etnoyer, and I.R. MacDonald. 2015. Coral injuries observed at mesophotic reefs after the Deepwater Horizon oil discharge. *Deep Sea Research Part II: Topical studies in oceanography*. doi: 10.1016/j.dsr2.2015.05.013. (Silva et al., 2015)
- Slabbekoorn, H., N. Bouton, I. van Opzeeland, A. Coers, C. ten Cate, and A.N. Popper. 2010. A noisy spring: The impact of globally rising underwater sound levels on fish. *Trends in Ecology & Evolution* 25:419-427. (Slabbekoorn et al., 2010)

- Smultea, M. A., J. J. R. Mobley, D. Fertl, and G. L. Fulling. 2008a. An unusual reaction and other observations of sperm whales near fixed-wing aircraft. *Gulf and Caribbean Research* 20:75-80.
- Tyack, P.L. 2008. Implications for marine mammals of large-scale changes in the marine acoustic environment. *Journal of Mammology* 89(3):549-558 (Tyack, 2008)
- U.S. Dept. of Commerce. National Marine Fisheries Service. 2010b. Final recovery plan for the sperm whale (*Physeter macrocephalus*). U.S. Dept. of Commerce, National Marine Fisheries Service, Silver Spring, MD. 165 pp. Internet website:
http://www.nmfs.noaa.gov/pr/pdfs/recovery/final_sperm_whale_recovery_plan_21dec.pdf
(USDOC, NMFS, 2010b)
- U.S. Dept. of the Interior. Fish and Wildlife Service. 2011. Endangered Species Act – Section 7 consultation on the construction of a second explosive handling wharf at Bangor Navy Base, Kitsap County. Conducted by the U.S. Dept. of the Interior, Fish and Wildlife Service, Lacey, WA. 137 pp. (USDO, FWS, 2011)
- Vauk, G., E. Hartwig, B. Reineking, and E. Vauk-Hentzelt. 1989. Losses of seabirds by oil pollution at the German North Sea coast. *Topics in Marine Biology*. Ros, J.D, ed. *Scient. Mar.* 53 (2-3): 749-754.
- Vermeer, K. and R. Vermeer, 1975 Oil threat to birds on the Canadian west coast. *The Canadian Field-Naturalist*. 89:278-298.
- Wardle, C.S., T.J. Carter, G.G. Urquhart, A.D.F. Johnstone, A.M. Ziolkowski, G. Hampson, and D. Mackie. 2001. Effects of seismic air guns on marine fish. *Continental Shelf Research* 21(8):1005-1027 (Wardle et al., 2001)
- Wursig, B., S. K. Lynn, T. A. Jefferson, and K. D. Mullin. 1998. Behaviour of cetaceans in the northern Gulf of Mexico relative to survey ships and aircraft. *Aquatic Mammals* 24(1):41-50.
- Wysocki, L.E. and F. Ladich. 2005. Hearing in fishes under noise conditions. *Journal of the Association for Research in Otolaryngology* 6:28-36. (Wysocki and Ladich, 2005)
- Young, C. N., Carlson, J., Hutchinson, M., Hutt, C., Kobayashi, D., McCandless, C.T., Wraith, J. 2016. Status Review Report: oceanic whitetip shark (*Carcharhinus longimanus*). Final report to the National Marine Fisheries Service, Office of Protected Resources.:162.

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

- Hazard Surveys

APPENDIX R
ADMINISTRATIVE INFORMATION

A. EXEMPTED INFORMATION

Proprietary information included in the proprietary copy of this DOCD

- BHL, TVD and MD information on form BOEM 0137 (OCS Plan Information Form)
- Relief Well Plan
- All items and enclosures under Geological and Geophysical Information

B. BIBLIOGRAPHY

The following documents were utilized in preparing this Plan:

Document	Author	Dated
Site Clearance Letter for Proposed Wellsite C, Block 872, Keathley Canyon Area, Gulf of Mexico	Geoscience Earth & Marine Services, Inc., (GEMS)	2023
Shallow Hazards and Archaeological Assessment, Block 829 (OCS-G-25814), Keathley Canyon Area, Gulf of Mexico 2017.	Geoscience Earth & Marine Services, Inc., (GEMS)	2017
Shallow Hazards and Archaeological Assessment, Blocks 871 / 872 Keathley Canyon Area, Gulf of Mexico, 2019	Geoscience Earth & Marine Services, Inc., (GEMS)	2019
BOEMRE Environmental Impact Statement Report – No. 2009-053	Bureau of Ocean Energy Management, Regulation, and Enforcement	2009
Regional Oil Spill Response Plan	LLOG Exploration Offshore, L.L.C.	2023