

UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE
Gulf of Mexico OCS Region
New Orleans, Louisiana

FINAL

SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT
ENDANGERED SPECIES/STRUCTURE REMOVAL

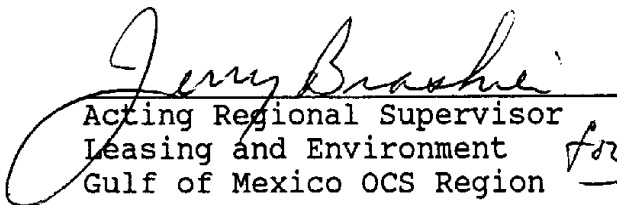
No. ES/SR 94-006

Structure-Removal Activities
High Island Area, Block A-154
(Lease OCS-G 10285)

by LLECO Holdings, Inc.
Date Submitted: November 17, 1993
Commencement Date: December 1993
Prepared by Susan B. Gaudry

FINDING OF NO SIGNIFICANT IMPACT

I have considered the notification by LLECO Holdings, Inc., to non-explosively remove Platform A, a single-well braced caisson, in High Island Area, Block A-154 (Lease OCS-G 10285), SEA No. ES/SR 94-006. Based on the environmental analysis, there is no evidence to indicate that the proposed action will significantly (40 CFR 1508.27) affect the quality of the human environment. Preparation of an environmental impact statement is not required.


Acting Regional Supervisor
Leasing and Environment
Gulf of Mexico OCS Region *for*

12/8/93
Date

TABLE OF CONTENTS

	PAGE
FINDING OF NO SIGNIFICANT IMPACT	ii
INTRODUCTION AND BACKGROUND	1
I. DESCRIPTION OF THE PROPOSAL AND NEED FOR THE PROPOSAL	1
A. DESCRIPTION OF THE PROPOSED ACTION	1
B. NEED FOR THE PROPOSED ACTION	1
II. ALTERNATIVES TO THE PROPOSED ACTION	2
A. NON-REMOVAL OF THE STRUCTURES	2
B. REMOVAL OF THE STRUCTURE AS PROPOSED WITH ADDED MITIGATION	2
III. ENVIRONMENTAL EFFECTS, SOCIOECONOMIC CONCERNS, AND OTHER CONSIDERATIONS	2
A. PHYSICAL ENVIRONMENT	2
1. Environmental Geology and Geologic Hazards	2
2. Meteorological Conditions	2
3. Physical and Chemical Oceanography	2
a. Physical Oceanography	2
b. Chemical Oceanography	3
4. Water Quality	3
5. Air Quality	3
B. BIOLOGICAL ENVIRONMENT	3
1. Coastal Habitats	3
2. Protected, Endangered, and/or Threatened Species	3
a. Birds	3
b. Marine Mammals	3
c. Sea Turtles	4
3. Birds	4
4. Sensitive Marine Habitats	4
5. Offshore Habitats and Biota	4

	PAGE
C. SOCIOECONOMIC CONCERNS	4
1. Employment	4
2. Economics	4
3. Onshore Support Facilities, Land Use, and Coastal Communities and Services	5
D. OTHER CONSIDERATIONS	5
1. Commercial and Recreational Fisheries	5
a. Commercial Fisheries	5
b. Recreational Fisheries	5
2. Archaeological Resources	5
3. Military Use/Warning Areas and Explosive Dumping Areas	5
4. Navigation and Shipping	5
5. Pipelines and Cables	6
6. Other Mineral Resources	6
7. Human Health and Safety	6
E. UNAVOIDABLE ADVERSE IMPACTS	6
IV. PUBLIC OPINION	6
V. CONSULTATION AND COORDINATION	6
VI. BIBLIOGRAPHY AND SPECIAL REFERENCES	7
VII. PREPARERS	8
VIII. APPENDIX	9
A. LLECO HOLDINGS, INC., CORRESPONDENCE	10

INTRODUCTION AND BACKGROUND

The purpose of this Site-Specific Environmental Assessment (SEA) is to assess the specific impacts associated with proposed structure-removal activities. The SEA is based on a Programmatic Environmental Assessment (PEA) (USDOJ, MMS, 1987) which evaluates a broader spectrum of potential impacts resulting from the removal of structures, e.g., platforms/caissons across the Central and Western Planning Areas of the Gulf of Mexico (GOM) Outer Continental Shelf. The PEA/SEA process is designed to simplify and reduce the size of environmental assessment documents by eliminating repetitive discussions of the same issues. This SEA conforms to the MMS and other appropriate guidelines for preparing environmental assessments by utilizing data presented in the PEA to complete the assessment. It presents site-specific data regarding the proposed structure removal and evaluates the removal's potential impacts. Preparation of this SEA has allowed the determination of whether a Finding of No Significant Impact (FONSI) is appropriate or whether further assessment of the proposal is necessary.

I. DESCRIPTION OF THE PROPOSAL AND NEED FOR THE PROPOSAL

A. DESCRIPTION OF THE PROPOSED ACTION

LLECO Holdings, Inc., proposes to remove Platform A, a single-well braced caisson, in High Island Area, Block A-154 (Lease OCS-G 10285). The structure is located in a water depth of 133 feet and lies approximately 80 miles south of Jefferson County, Texas. The operator plans to use abrasive cutters to sever the two pilings, support braces and the caisson and its conductor/casing string approximately 15 feet below the mud line.

Since no explosives will be utilized during the proposed removal activities, the MMS has determined that sea turtles and marine mammals will not be affected. A Section 7 Consultation under the Endangered Species Act will not be initiated.

Refer to Appendix A for structure specifications and additional information on the removal activities.

B. NEED FOR THE PROPOSED ACTION

A discussion of the legal and regulatory mandates to remove abandoned oil and gas structures from Federal waters can be found in the PEA referenced in the Introduction. The well ceased production and the lease expired on November 30, 1993.

II. ALTERNATIVES TO THE PROPOSED ACTION

A. NON-REMOVAL OF THE STRUCTURE

The alternative to the proposed structure removal as originally submitted is non-removal. Non-removal of the structure would represent a conflict with Federal legal and regulatory requirements, which mandate the timely removal of obsolete or abandoned structures within a period of one year after termination of the lease, or upon termination of a right of use of easement. Therefore, non-removal does not appear to be a valid alternative.

B. REMOVAL OF THE STRUCTURE AS PROPOSED WITH ADDED MITIGATION

In the course of this evaluation process, the following additional protective measure was identified to further mitigate the environmental impacts associated with the proposal:

There is/are existing pipeline(s) located within 150 meters (490 feet) of the proposed activities. Therefore, precautions in accordance with NTL No. 83-3, Section IV.B, will be taken prior to conducting operations.

III. ENVIRONMENTAL EFFECTS, SOCIOECONOMIC CONCERNS, AND OTHER CONSIDERATIONS

A. PHYSICAL ENVIRONMENT

1. Environmental Geology and Geologic Hazards

A discussion of environmental geology and geologic hazards can be found in the PEA referenced in the Introduction. The proposed structure-removal activities are not in an area of sediment instability (mud flows, slumps, or slides). Therefore, geologic conditions are not expected to have an impact on the proposed structure-removal activities.

2. Meteorological Conditions

No impacts are expected as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

3. Physical and Chemical Oceanography

a. Physical Oceanography

No impacts are expected as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

b. Chemical Oceanography

Impacts are expected to be very low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

4. Water Quality

Impacts are expected to be low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

5. Air Quality

Impacts are expected to be very low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

B. BIOLOGICAL ENVIRONMENT

1. Coastal Habitats

No impacts are expected as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

2. Protected, Endangered, and/or Threatened Species

a. Birds

The operator has indicated that they propose to use Cameron, Louisiana, as the shore base to support the proposed structure-removal activities. The PEA referenced in the Introduction delineates sensitive areas along the Texas coastline where whooping cranes and brown pelicans could be adversely impacted by structure-removal support activities. The shore base for the proposed activities lies outside of this sensitive area. Therefore, the proposed work is not expected to impact threatened or endangered birds or their habitats.

b. Marine Mammals

A discussion of marine mammals occurring across the GOM and an assessment of the potential impacts of structure-removal activities on marine mammals can be found in the PEA referenced in the Introduction. Fritts et al. (1983) conducted aerial surveys across a 9,514 square mile area of waters lying in the GOM. Results of these surveys indicate that the bottlenose dolphin is by far the most likely marine mammal to be encountered at the proposed structure removal. Since the proposed structure removal will utilize no explosives, no impacts are expected on marine mammals.

c. Sea Turtles

A discussion of sea turtles occurring across the central and western GOM and an assessment of the potential impacts of structure-removal activities on sea turtles can be found in the PEA referenced in the Introduction. Studies by Fritts et al. (1983) and Fuller and Tappan (1986) as well as stranding data from the Sea Turtle Stranding and Salvage Network (Teas, 1993) indicate that sea turtles occur in the vicinity of the proposed activities. Definitive information on the probability of encountering sea turtles at the removal site during removal operations is scarce. Since the proposed structure removal will utilize no explosives, no impacts are expected on sea turtles.

3. Birds

Impacts are expected to be very low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

4. Sensitive Marine Habitats

A discussion of sensitive marine habitats occurring in the central and western GOM and an assessment of the potential impacts of structure-removal activities on these areas can be found in the PEA referenced in the Introduction. The proposed activities are not near any sensitive marine habitats. Therefore, the subject structure removal will not impact any sensitive marine habitats or their resident biota.

5. Offshore Habitats and Biota

Impacts are expected to be low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

C. SOCIOECONOMIC CONCERNS

1. Employment

Impacts are expected to be very low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

2. Economics

Impacts are expected to be very low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

3. Onshore Support Facilities, Land Use, and Coastal Communities and Services

The operator has indicated that they propose to use Cameron, Louisiana, as the shore base to support the proposed structure-removal activities. No impacts are expected as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

D. OTHER CONSIDERATIONS

1. Commercial and Recreational Fisheries

a. Commercial Fisheries

Impacts are expected to be low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction. The MMS has not been notified through the Fisherman's Contingency Fund of any hang sites within Block A-154.

b. Recreational Fisheries

Impacts are expected to be low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

2. Archaeological Resources

Impacts are expected to be low as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

3. Military Use/Warning Areas and Explosive Dumping Areas

The proposed structure-removal activities will not take place in a military use/warning area or in an explosive dumping area. In addition, the shore base location chosen by the operator and/or his contractor(s) will not require support vessels or aircraft to traverse any of these areas. A description of these areas, their locations and potential impacts of structure-removal activities on these areas can be found in the PEA referenced in the Introduction. The proposed activities will not impact or be impacted by any military use/warning areas or explosives dumping areas.

4. Navigation and Shipping

The proposed structure-removal activities are not located adjacent to a vessel safety fairway or in an anchorage. Structures located nearshore may serve as "landmarks" to vessels or helicopters operating in the area on a regular basis. The

overall impacts of the proposed work on navigation and shipping is expected to be very low. More information on the impacts of structure removals on navigation and shipping can be found in the PEA referenced in the Introduction.

5. Pipelines and Cables

The PEA referenced in the Introduction contains a description of the impacts of structure removals on pipelines and cables. The proposed work will take place within 150 meters (490 feet) of existing pipeline(s). Since the operator must adhere to existing laws and regulations for abandonment of structures (including procedures required by Notice to Lessees and Operators 83-3), the proposed work will not pose a hazard to pipelines or cables in the area.

6. Other Mineral Resources

No impacts are expected as a result of the proposed activities. For analysis information, see the PEA referenced in the Introduction.

7. Human Health and Safety

The PEA referenced in the Introduction describes the hazardous conditions for workers during structure-removal activities. The operator has proposed a non-explosive method to remove the subject structure. Existing legal and regulatory safety requirements will keep the impacts of the proposed work on human health and safety at a very low level.

E. UNAVOIDABLE ADVERSE IMPACTS

A discussion of unavoidable adverse impacts can be found in the PEA referenced in the Introduction. One area of primary concern is the potential loss of habitat to the marine environment. This topic is discussed in the PEA referenced in the Introduction and a low level of impact is expected. Other unavoidable adverse impacts are considered to be minor.

IV. PUBLIC OPINION

A discussion of public concerns regarding structure removals can be found in the PEA referenced in the Introduction. The proposed structure removal has generated no comments from the public.

V. CONSULTATION AND COORDINATION

In accordance with the provisions of Section 7 of the Endangered Species Act, this proposed structure removal does not require coordination with the National Marine Fisheries Service.

VI. BIBLIOGRAPHY AND SPECIAL REFERENCES

- Fritts, T.H., A.B. Irvine, R.D. Jennings, L.A. Collum, W. Hoffman, and M.A. McGehee. 1983. Turtles, birds, and mammals in the northern Gulf of Mexico and nearby Atlantic waters. U.S. Fish and Wildlife Service, Division of Biological Services, Washington, D.C.
- Fuller, D.A. and A.M. Tappan. 1986. The occurrence of sea turtles in Louisiana coastal waters. Coastal Fisheries Institute. Center for Wetland Resources. Louisiana State University. Baton Rouge, LA.
- Teas, Wendy G. 1993. 1993 Semi-annual report of the sea turtle stranding and salvage network. Atlantic and Gulf Coasts of the United States. January - June 1993. National Marine Fisheries Service. Southeast Fisheries Center, Miami Laboratory, 75 Virginia Beach Drive, Miami, FL.
- U.S. Department of the Interior. Minerals Management Service. 1991. Final Environmental Impact Statement. Gulf of Mexico Sales 139 and 141 (Central and Western Gulf of Mexico). OCS EIS/EA MMS No. 91-0018. Washington, D. C. Available from the Gulf of Mexico Region or from NTIS, Springfield, VA. Volume 1, PB92-125376/AS and Volume 2, PB92-125384/AS.
- U.S. Department of the Interior. Minerals Management Service. 1987. Programmatic Environmental Assessment. Structure-removal activities Central and Western Gulf of Mexico Planning Areas. OCS/EA 87-0002. Gulf of Mexico OCS Region, New Orleans, LA.

VII. PREPARERS

Author:

Susan B. Gaudry - Environmental Protection Assistant

Typists:

Carolyn A. Crist - Secretary

Alice Sue Kriz - Office Automation Clerk

VIII.APPENDIX

A. LLECO HOLDINGS, INC., CORRESPONDENCE

APPENDIX A

LLECO HOLDINGS, INC., CORRESPONDENCE

UNITED STATES GOVERNMENT
MEMORANDUM

56

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11/18/93

To: Environmental Operations Section (LE-5)
From: Office of Structural and Technical Support, Field Operations,
Gulf of Mexico OCS Region (OSTS)

Subject: Platform Removal

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NOV 23 1993

OPERATOR: LL&E

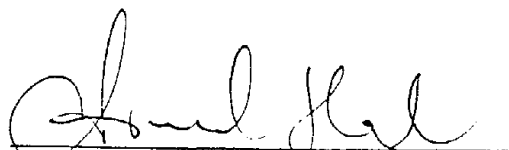
Control No: ES/SR 94-006

Minerals Management Service
Leasing & Environment

<u>Platform</u>	<u>Area/Block</u>	<u>Lease</u>
<u>A</u>	<u>HI A-154</u>	<u>OCS-G 10285</u>
_____	_____	_____
_____	_____	_____

Shore Base: Cameron, LA

The attached application is forwarded to your office so that the Finding of No Significant Impact can be prepared. Since explosives will not be used in this removal operation, an Endangered Species Act Section 7 Consultation Documentation is not required. There are ~~are~~ no existing pipeline(s) within 500 feet of the proposed removal location.


Arvind Shah (OSTS)
Extension 2894

Attachment

cc:

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FILE: 94-006.SEA

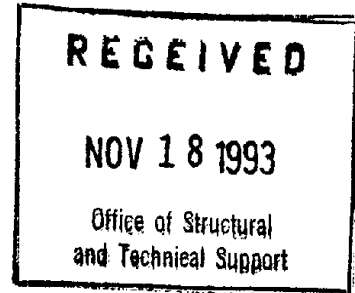
LL&E
LLECO HOLDINGS, INC.
a subsidiary of
THE LOUISIANA LAND AND EXPLORATION COMPANY
10375 RICHMOND AVENUE, SUITE 600
HOUSTON, TEXAS 77042
(713) 266-4040 (713) 260-5605 facsimilie

November 17, 1993

Mr. D. J. Bourgeois
Regional Supervisor, Field Operations
Minerals Management Service
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Attention: Mr. Arvind Shah
MS 5210

RE: **PROPOSED PLATFORM ABANDONMENT
HIGH ISLAND BLOCK A-154
OCS-G 10285 PLATFORM "A"**



Dear Sir:

LLECO Holdings, Inc. ("LLECO") herein submits this application for approval to plug and abandon the subject structure. This is a single well unmanned braced caisson with a production deck and helideck. The A-1 well ceased production in July 1992, and lease OCS-G 10285 expires November 30, 1993.

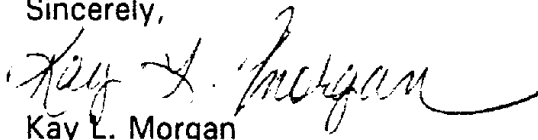
Explosives will not be used for this structure abandonment. The braces, pilings and caisson will be severed 15' below the mud line using abrasive cutters. LLECO would like to perform these abandonment operations in December 1993.

Enclosed is the "Proposed OCS Platform/Structure Removal", along with a copy of the platform drawing. An application for the site clearance verification in accordance with NTL 92-02 will be submitted to your office under separate cover.

Minerals Management Service
Attention Mr. Arvind Shah
November 17, 1993
Page 2

Should you have any questions concerning this application or require additional information, please contact me at 713/260-5678.

Sincerely,

A handwritten signature in cursive script that reads "Kay L. Morgan". The signature is written in black ink and is positioned above the printed name.

Kay L. Morgan
Sr. Permit Coordinator

Enclosures

cc - Minerals Management Service
Attention Mr. Ed Smith
115 Circle Way
Lake Jackson, Texas 77566

PROPOSED OCS PLATFORM/STRUCTURE REMOVAL

I. Responsible Party

A. Lease Operator Name LLECO Holdings, Inc.

B. Address 10375 Richmond Avenue, Suite 600

Houston, Texas 77042

C. Contact Person and Telephone Number Kay L. Morgan

713/260-5678

II. Identification of Structure to be Removed

A. Platform Name High Island Block A-154 Platform "A"

B. Location (Lease, Area, Block and Block Coordinates) OCS-G 10285,

High Island Block A-154, Latitude 28° 31' 11"; Longitude 93° 57' 23",

X = 3,619,155.81; Y = 284,500.00

C. Date Installed (Year) 1989

D. Proposed Date of Removal (Month/Year) 12/93

E. Water Depth 133'

III. Description of Structure to be Removed

A. Configuration (Attached a Photograph or a Diagram)

B. Size 38' x 38' Production Deck with heliport

C. Number of Legs/Casings/Pilings 2 support braces, 2 pilings, 1 well caisson

D. Diameter and Wall Thickness of Legs/Casings/Pilings _____

Item/Diameter/Wall thickness: Caisson/48"/1", Pilings/48"/1",

Braces/42"/1"

E. Are piles grouted? Yes Inside or outside? Outside

F. Brief description of soil composition and condition: Soft Clay

IV. Purpose

Brief discussion of the reason for removing the structure: Well has ceased production; lease expires 11/30/93

V. Removal Method

A. Brief description of the method to be used: The well will be plugged and abandoned. The support braces, support pilings and well caisson will be severed 15' BML using abrasive cutters. No explosives will be used.

B. If explosives are to be used, provide the following:

1. Kind of Explosive: N/A

2. Number and Sizes of Charges: N/A

a. Single shot or multiple shots? N/A

b. If multiple shots, sequence and timing of detonations:

N/A

3. Bulk or Shaped Charge? N/A

a. Depth of detonation below the mud line: N/A

b. Inside or outside piling? N/A

C. Pre-Removal Monitoring Techniques

1. Is the use of scare charges or acoustic devices proposed? No

If yes, provide the following:

a. Number and kind: _____

b. Size of charges: _____

c. Brief description of how, where, and when scare charges or acoustic devices will be used? _____

2. Will divers or acoustic devices be used to conduct a pre-removal survey to detect presence of turtles and marine mammals? Only in conjunction with diving required to prepare the casing for abandonment.

If yes, briefly described the proposed detection method: N/A

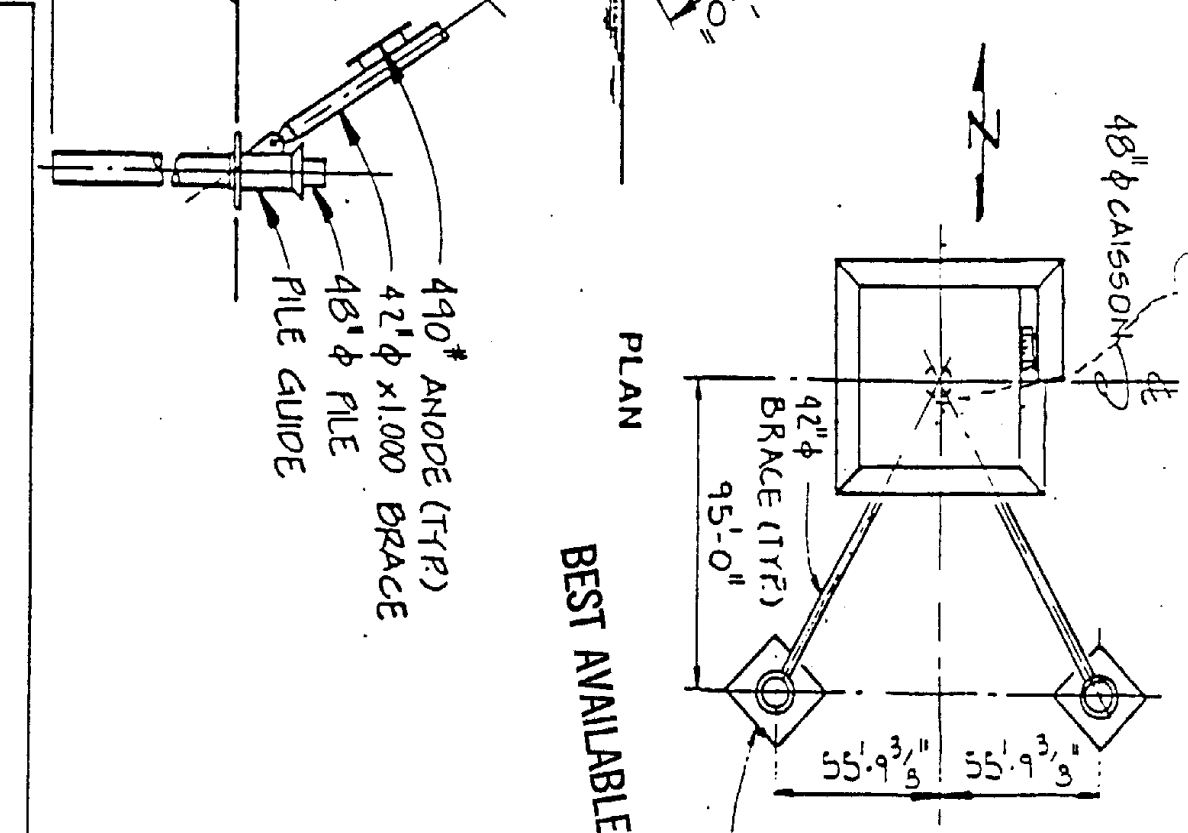
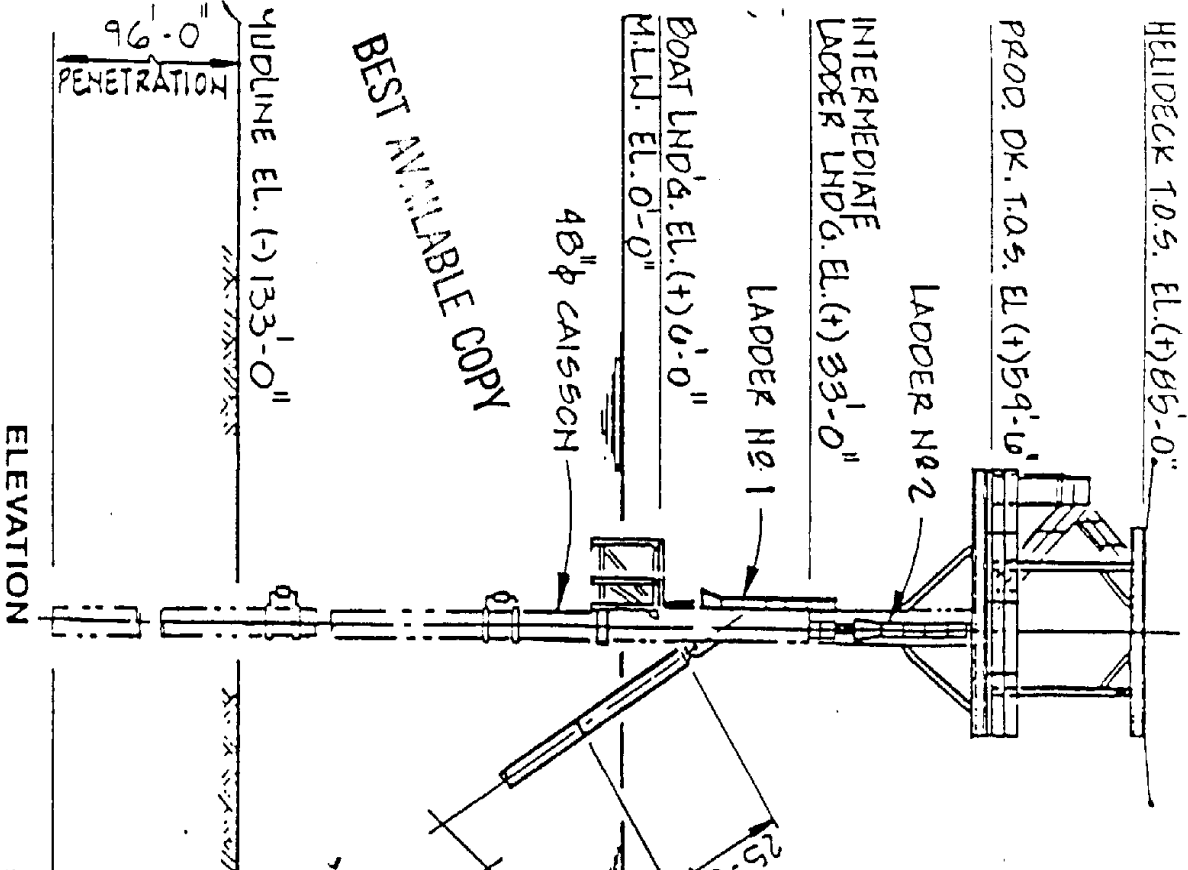
D. Post-Removal Monitoring Techniques

1. Will transducers be used to measure the pressure and impulse of the detonations? N/A

2. Will divers be used to survey the area after removal to determine any effects on marine life? Only in conjunction with diving required for the completion of well and platform abandonment.

VI. Biological Information

If available, provide the results of any recent biological surveys conducted in the vicinity of the structure. If available, describe any recent observations of turtles or marine mammals at the structure site.



APPLICATION BY: SANDEFER OFFSHORE OPERATING CO.
 COMPANY
 SIGNATURE _____
 TITLE _____

LEASE NO. _____
 BLOCK NO. BLOCK A-154
 AREA HIGH ISLAND
 OPERATOR SANDEFER OFFSHORE OPERATING CO.

APPROVED BY: [Signature]
 DATE 3-6-8
 SEAL

94-006

LL&E
10375 Richmond Avenue, Suite 600
Houston, Texas 77042

Fax # 713/260-5673

RECEIVED
DEC 06 1993
Office of Structures
and Technical Support

=====

TRANSMITTAL SHEET

DATE: 12/3/93

TO: ARVIND SHAH

mms

FROM: KAY MORGAN

INCLUDING THIS PAGE, THIS TRANSMITTAL HAS 2 PAGES. PLEASE CALL KAY MORGAN AT 713/260-5678 IF YOU HAVE DIFFICULTY RECEIVING.

THANK YOU.

COMMENTS: _____

LL&E
LLECO HOLDINGS, INC.
 a subsidiary of
THE LOUISIANA LAND AND EXPLORATION COMPANY
 10375 RICHMOND AVENUE, SUITE 600
 HOUSTON, TEXAS 77042
 (713) 266-4040 (713) 260-5605 facsimile

December 3, 1993

Mr. Arvind Shah
 Minerals Management Service (MS 5210)
 Gulf of Mexico OCS Region
 1201 Elmwood Park Boulevard
 New Orleans, Louisiana 70123-2394

**RE: PROPOSED PLATFORM ABANDONMENT
 HIGH ISLAND BLOCK A-154/OCS-G 10285 PLATFORM "A"
 SUPPLEMENTAL INFORMATION**

Mr. Shah:

As requested by telephone today, the following is the data you needed.

The well at this location, No. A-1, has the following casing strings:

- 48", 1" wall thickness drive pipe set at 380'
- 10 3/4" 45.5# K55, 0.40" wall thickness casing set at 3018'
- 7" 26# N80, 0.362" wall thickness casing set at 6801'

The 10 3/4" and 48" casing strings are grouted together at approximately 250-285' RKB (17-52' BML).

If additional information is needed to continue processing this application, please contact me as soon as possible at 713/260-5678.

Sincerely,



Kay L. Morgan
 Sr. Permit Coordinator

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