UNITED STATES GOVERNMENT
MEMORANDUM

October 24, 2002

To: Public Information (MS 5034)

From: Plan Coordinator, FO, Plans Section (MS 5231)

Subject: Public Information copy of plan

Control #	-	N-07575
Type	-	Initial Development Operations Coordinations Document
Lease(s)	-	OCS-G22587 Block - 194 East Cameron Area
Operator	-	Union Oil Company of California
Description	-	Well No. 1
Rig Type	-	JACKUP

Attached is a copy of the subject plan.

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

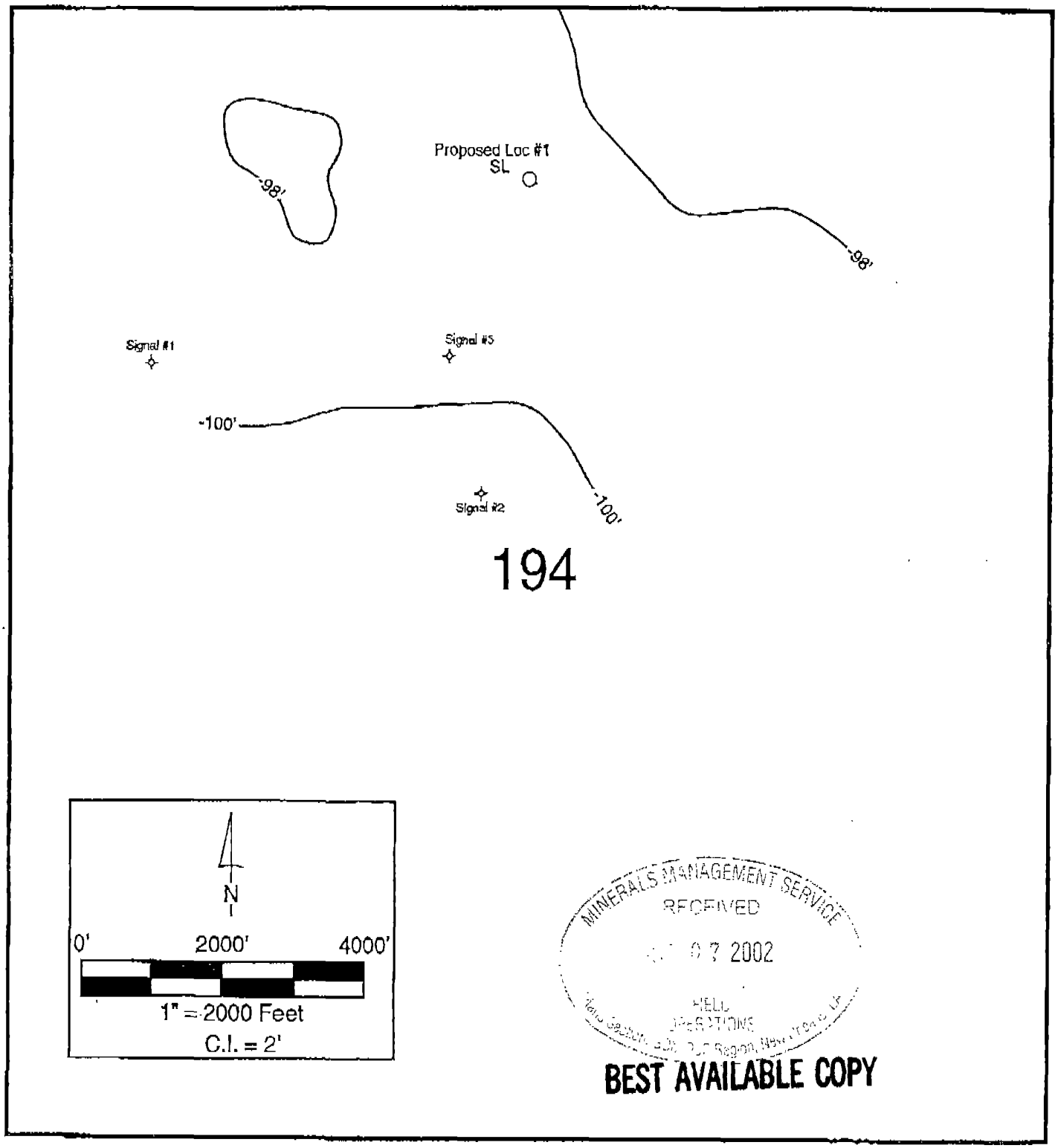
Karen Dunlap
Karen Dunlap
Plan Coordinator

Site Type/Name	Botm Lse/Area/Blk	Surface Location	Surf Lse/Area/Blk
CAIS/NO. 1		2200 FNL, 7300 FWL	G22587/EC/194
WELL/NO. 1	G22587/EC/194	2200 FNL, 7300 FWL	G22587/EC/194

mailed/cc

V-7575

OCS-G 22587



Union Oil Company of California
Bathymetry Map
East Cameron
Block 194

Unocal North American
Oil & Gas Division
Unocal Corporation
14141 Southwest Freeway
Sugar Land, Texas 77478
P.O. Box 4551
Houston, Texas 77210-4551
Telephone (713) 491-7600

UNOCAL 76

September 30, 2002

U. S. Department of the Interior
Minerals Management Service
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123

Attn: Plans Section, Office of Field Operations

Re: Initial Development Operations Coordination Document (DOCD), Block 194, OCS-G-22587, East Cameron Area

Dear Sir,

Attached are five proprietary and four public information copies of an Initial DOCD addressing our proposed activity in East Cameron Area Block 194. Should additional information be required, please contact Joe Morton, Tim Morton & Associates, Inc., 730 E. Kaliste Saloom Road, Lafayette, LA 70508, 337/234-5124.

Sincerely,

UNION OIL COMPANY OF CALIFORNIA

For Terry Cook

jm
Attachments

CONTROL No. N-7515
REVIEWER: Karen Dunlap
PHONE: (504) 736-2535

INITIAL

DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

UNION OIL COMPANY OF CALIFORNIA

EAST CAMERON AREA BLOCK 194

OCS-G-22587

OFFSHORE LOUISIANA

September 26, 2002

LIST OF ATTACHMENTS

A. Vicinity Plat and Location Plat

B. Typical Caisson

C. Shallow Hazard Report, Geologic Structure Maps, Cross-Section Map and Bathymetry Map

D. Drilling Fluids List

E. Coastal Zone Consistency Certification, Environmental Impact Analysis and Air Quality Screening Checklist

INITIAL

DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

EAST CAMERON AREA BLOCK 194

OFFSHORE LOUISIANA

Pursuant to the requirements of 30 CFR 250 Subpart B, Union Oil Company of California (Unocal) submits the following Initial Development Operations Coordination Document for East Cameron Area Block 194.

I. DESCRIPTION OF ACTIVITIES

Unocal proposes to utilize a jack-up rig to drill one well in East Cameron Area Block 194. Specific information regarding the well location is as follows:

Well Name	Surface Location	Bottomhole Location	TVD/ MD	Lambert Coordinates	Water Depth
1	7300' FWL 2200' FNL	PROP. INFO.	PROP. INFO.	X = 1,516,816' Y = 47,881'	98'

The anticipated spud date for Well No. 1 is November 21, 2002. It is expected to take 41 days to drill and complete the well. If the well is successful, Unocal proposes to install a single well caisson at the surface location of Well No. 1. A flowline will be installed from the proposed caisson to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. Hydrocarbons would be transported from that platform to shore via an existing pipeline gathering system.

Attachment A contains a vicinity map that depicts the relationship of East Cameron Area Block 194 to the Louisiana Coast and a location plat that depicts the proposed well location in relation to the lease lines. The estimated time to complete the proposed development and production activity is approximately 5 years.

II. SCHEDULE OF ACTIVITIES

The proposed schedule for the development is:

November 21, 2002 - December 15, 2002	Drill Well No. 1
March 15, 2003 - March 31, 2003	Complete Well No. 1
April 1, 2003 - April 15, 2003	Install caisson, deck and flowline
April 15, 2003	Produce Well No. 1

Reserves are expected to be depleted in 5 years with maximum production anticipated at a daily rate of 12 MMCF of natural gas and 15 BPD of condensate.

III. DRILLING RIG AND PLATFORM

Union Oil Company of California plans to use a jack-up rig to drill the proposed well. The actual rig specifications for the rig to be used will be submitted with the applications for Permit to Drill for the well.

Safety and pollution prevention will be accomplished during drilling operations through the use of adequately designed casing programs; blowout preventers, diverters, and other associated well equipment of adequate pressure rating to control anticipated pressures; mud monitoring equipment and sufficient mud volumes to ensure well control; and properly trained supervisory personnel. Pursuant to Coast Guard regulations, fire drills and abandon ship drills will be conducted, and navigational aids, lifesaving equipment, and all other shipboard safety equipment will be installed and maintained.

Unocal proposes to install a single well caisson at the surface location of Well No. 1. All production operations will be conducted in accordance with Minerals Management Service Operating Regulations and API RP 14C.

IV. GEOLOGICAL AND GEOPHYSICAL DATA

Geologic structure maps, cross-section map and a bathymetry map are provided with the confidential copies of this document in Attachment C. As stated in the Shallow Hazard Report also included in Attachment C, there are no shallow drilling hazards expected in the drilling of the proposed well. The water depth at the surface location of proposed well 98 feet.

V. OIL SPILL INFORMATION

Unocal is a member of Clean Gulf Associates (CGA), and would utilize CGA equipment in the event of an oil spill at East Cameron Area Blocks 266 and 270. CGA is an oil spill cooperative which owns a large inventory of oil spill clean-up equipment which is supported by Marine Spill Response Corporation (MSRC). MSRC is responsible for storing, inspecting, maintaining and dispatching CGA's equipment. An inventory of spill response equipment suitable for spills in the Gulf of Mexico is identified in Unocal's Oil Spill Response Plan (OSRP) which was approved on December 10, 2001. Unocal and Unocal Pipeline Company are the two entities covered under the OSRP. Unocal requests that the activities proposed in this DOCD be covered by the OSRP.

In the event of a spill, the primary location for the procurement of clean-up equipment would be the CGA stockpile at Lake Charles, Louisiana. Additional cleanup equipment could be mobilized from the Houma and Fort Jackson, Louisiana and the Galveston and Ingleside, Texas CGA stockpile areas. The Lake Charles, Louisiana stockpile area is located approximately 100 miles from the block.

In accordance with 30 CFR 254.47, the worst case discharge associated with this DOCD is calculated as the sum of the following:

Worst Case Discharge = Oil Storage Tanks + Flowlines + Leaking Pipeline + Daily Production Volume
Worst Case Discharge = 0 + 1 + 608 + 15 = 624 barrels

Following is a comparison of the worst case scenario from Unocal's approved regional Oil Spill Response Plan to the worst case scenario from the proposed activities in this DOCD.

Category	**Regional OSRP**	**DOCD**
Type of Activity	Pipeline	Well, Caisson & Pipeline
Spill Location (area/block)	Ship Shoal Area 208	East Cameron Block 194
Facility Designation	SS 208 to SS 28, Segment 1196	Caisson
Distance to Nearest Shoreline (miles)	20 miles	55 miles
Volume	24,200 barrels	624 barrels
Type of Oil(s) (crude oil, condensate, diesel)	Crude Oil	Condensate
API° Gravity(s)		

Since Union Oil Company of California has the capability to respond to the worst-case spill scenario included in its regional Oil Spill Response Plan approved on December 10,2001, and since the worst-case scenario determined for their DOCD does not replace the worst-case scenario in their regional OSRP, Union Oil Company of California hereby certifies that they have 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 their DOCD.

VI. LEASE STIPULATIONS

Military Areas Stipulation

In response to the Military Areas Stipulation being invoked in this block, Unocal will contact the command headquarters for Military Warning Area W-59BC (Naval Air Station, New Orleans, Louisiana, Telephone - 504/391-8696 or 8687) for the purpose of entering into an agreement concerning the control of electromagnetic emissions and the use of boats and aircraft in the warning area.

VII. SOLID AND LIQUID WASTES AND POLLUTANTS

The discharges generated at the proposed well location by the drilling and production activities associated with this DOCD will be discharged upon successful bioassay test as per NPDES discharge guidelines. Discharge rates will not exceed permit specifications.

All drill cuttings will be brought to the surface by the mud system and will be separated from the drilling fluid by shaker screens and centrifugal separators prior to discharging overboard. This discharge is composed of the cuttings, shaker washwater, and adhered drilling fluids. The projected amounts of this discharge are based on the size of the hole at each drilling interval, and are computed at 25 percent over the gauge hole at that interval. Drill cuttings are assumed to comprise 50 percent of the discharge, washwater is assumed to comprise 42.5 percent, and adhered drilling fluids are assumed to comprise 7.5 percent. A list of drilling fluids to be utilized during the drilling operation is included as Attachment D.

Drilled solids and liquids discharge volumes for a typical well are listed below:

		Volumes/Well		
Drilling Interval	Hole Size	Drilled Solids	Shaker Washwater	Adhered Drilling Fluids
0 - 300'	30.00"	262 bbls	223 bbls	NA
300 - 650'	20.00"	170 bbls	144 bbls	26 bbls
650 - 2500'	12.25"	337 bbls	287 bbls	51 bbls
2500 - 11463'	9.875"	1061 bbls	902 bbls	159 bbls

Batch discharges of drilling fluids will be limited to 1000 barrels per hour. This limitation should only need to be imposed upon the completion of drilling operations.

Solids wastes; typically paper, plastic, cloth, and metal, will be collected and transported to shore for disposal at an approved disposal facility. Solid wastes generated from the transportation vessels, normally just garbage, will be collected and returned to shore for disposal with the drilling rig refuse. Scrap metal and other metal wastes will be recycled or sold as scrap and will not be shipped to a disposal facility with the other refuse.

Sanitary wastes will be treated in approved marine sanitation devices as required by the Clean Water Act. All biodegradable wastes, such as kitchen food scraps, will be comminuted or ground and discharged in accordance with Annex V of MARPOL 73/78.

Hazardous wastes from the drilling rig, such as paint, or paint thinner, will be collected in sealed metal containers and transported to an approved disposal site in accordance with RCRA guidelines.

VIII. H_2S AREA CLASSIFICATION

Based on previous drilling, no H_2S is known to occur in the project area. Union Oil Company of California, therefore, requests that East Cameron Area Block 194 be classified as a "Zone where the absence of H_2S has been confirmed".

IX. BIOLOGICAL INFORMATION

Activities proposed in this DOCD will not impact any deepwater chemosynthetic communities as the water depth at the surface location of the proposed well is 98 feet. All proposed bottom-disturbing

activities are outside the 3-mile zone of any identified topographic feature or within 100 feet of any pinnacle trend feature; therefore, no impacts to these features are anticipated.

X. NEW OR UNUSUAL TECHNOLOGY

Exploration and development activities in East Cameron Area Block 194 will not warrant utilizing any new or unusual technology that may affect coastal waters.

XI. CERTIFICATE OF COASTAL ZONE CONSISTENCY

A Certificate of Coastal Zone Consistency is included in Attachment E.

XII. ENVIRONMENTAL IMPACT ANALYSIS

An Environmental Impact Analysis has been prepared for the proposed activity and is included in Attachment E.

XIII. CALCULATION OF AIR EMISSIONS

An air quality screening checklist is included as Attachment E.

XIV. SUPPORT BASE

East Cameron Area Block 194 is located approximately 55 miles from the coast of Cameron Parish, Louisiana. An existing facility in Cameron, Louisiana will serve as the onshore support base for the East Cameron Area Block 194 development activities. This shore base is located approximately 100 miles from East Cameron Area Block 194. Unocal anticipates using one helicopter, one supply boat, and one crew boat to support the activities in this block. The helicopter will travel to the location on an as needed basis. The supply boat and crew boat will travel to location a total of three times per week and five times per week, respectively. The shore base will serve the following functions: loading point for tools, equipment and machinery to be delivered to the well site, transportation base, and temporary storage area for materials and equipment. The base is equipped with cranes and loading docks necessary for safe operations. The existing onshore facilities and support personnel are sufficient to support the proposed operations without modification or expansion.

XV. SURETY BOND REQUIREMENTS

In accordance with the amendment of 30 CFR Part 256 surety bond requirements applicable to OCS lessees and operators, Union Oil Company of California submitted an area-wide bond in the amount of $3,000,000.00 to the Minerals Management Service, New Orleans, Louisiana.

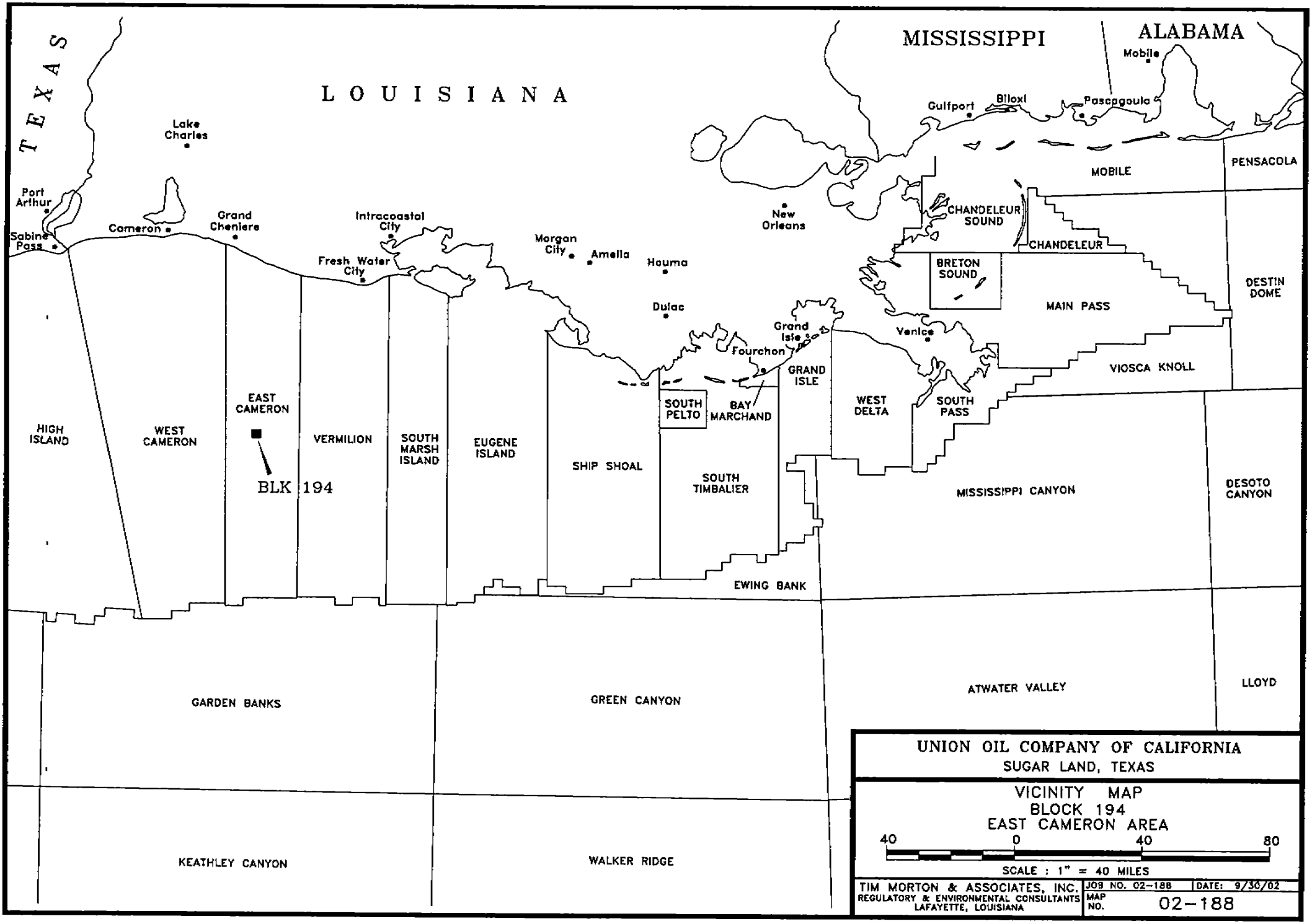
XVI. COMPANY CONTACT

Any inquiries regarding this plan may be addressed to Mr. Terry Cook, 281/287-5538, Union Oil Company of California, 14141 Southwest Freeway, Sugar Land, Texas 77478.

ATTACHMENT A

VICINITY PLAT

LOCATION PLAT



UNION OIL COMPANY OF CALIFORNIA
SUGAR LAND, TEXAS

VICINITY MAP
BLOCK 194
EAST CAMERON AREA

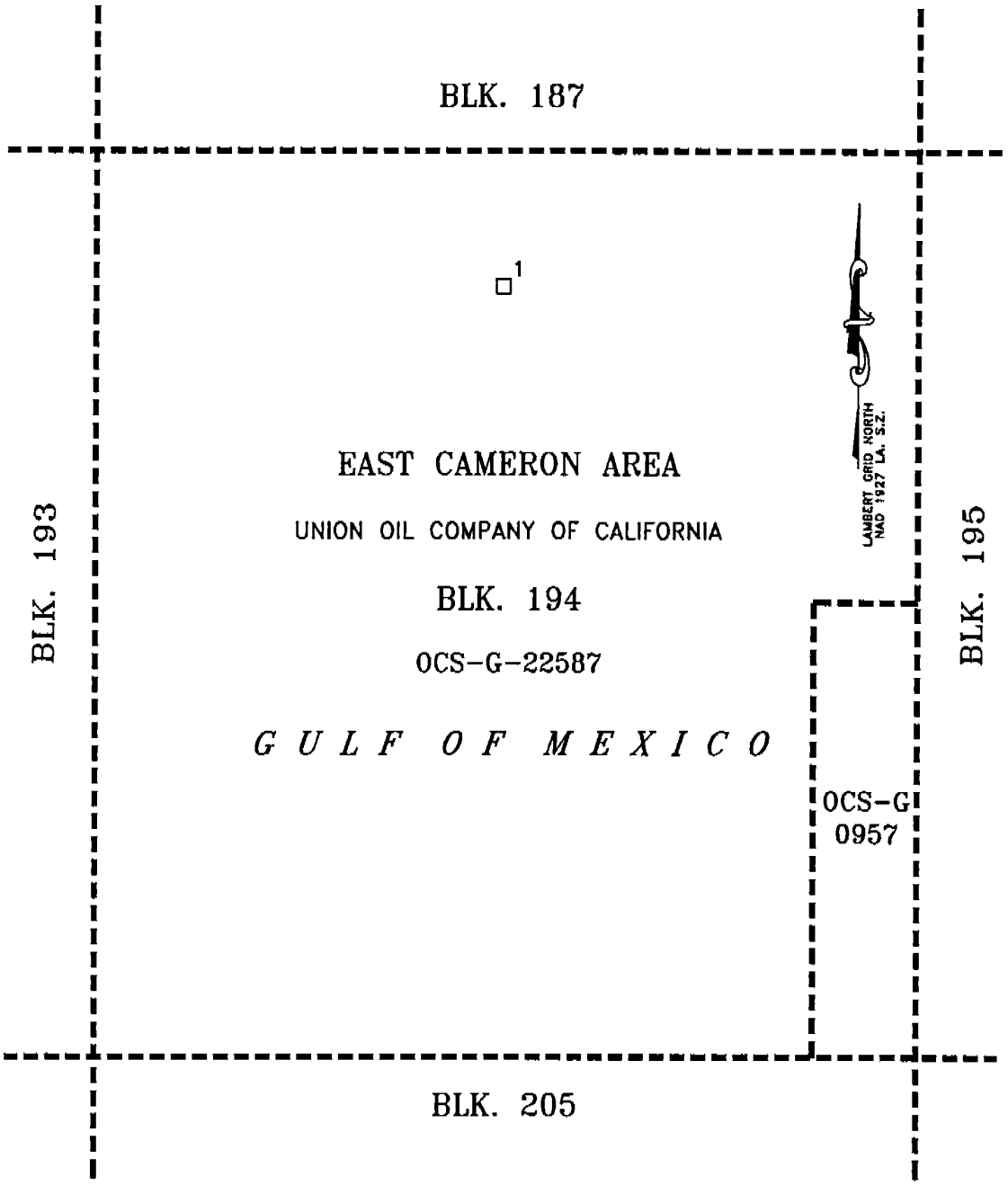
40 0 40 80

SCALE : 1" = 40 MILES

TIM MORTON & ASSOCIATES, INC.
REGULATORY & ENVIRONMENTAL CONSULTANTS
LAFAYETTE, LOUISIANA

JOB NO. 02-188 | DATE: 9/30/02

MAP NO. 02-188



PROPOSED SURFACE LOCATION

BLK.	WELL NO.	CALLS		X	Y	LATITUDE	LONGITUDE
194	1	7300' FWL	2200' FNL	1,516,816'	47,881'	28°47'22.5"	92°50'29.5"

UNION OIL COMPANY OF CALIFORNIA
14141 SOUTHWEST FREEWAY
SUGAR LAND, TEXAS 77478

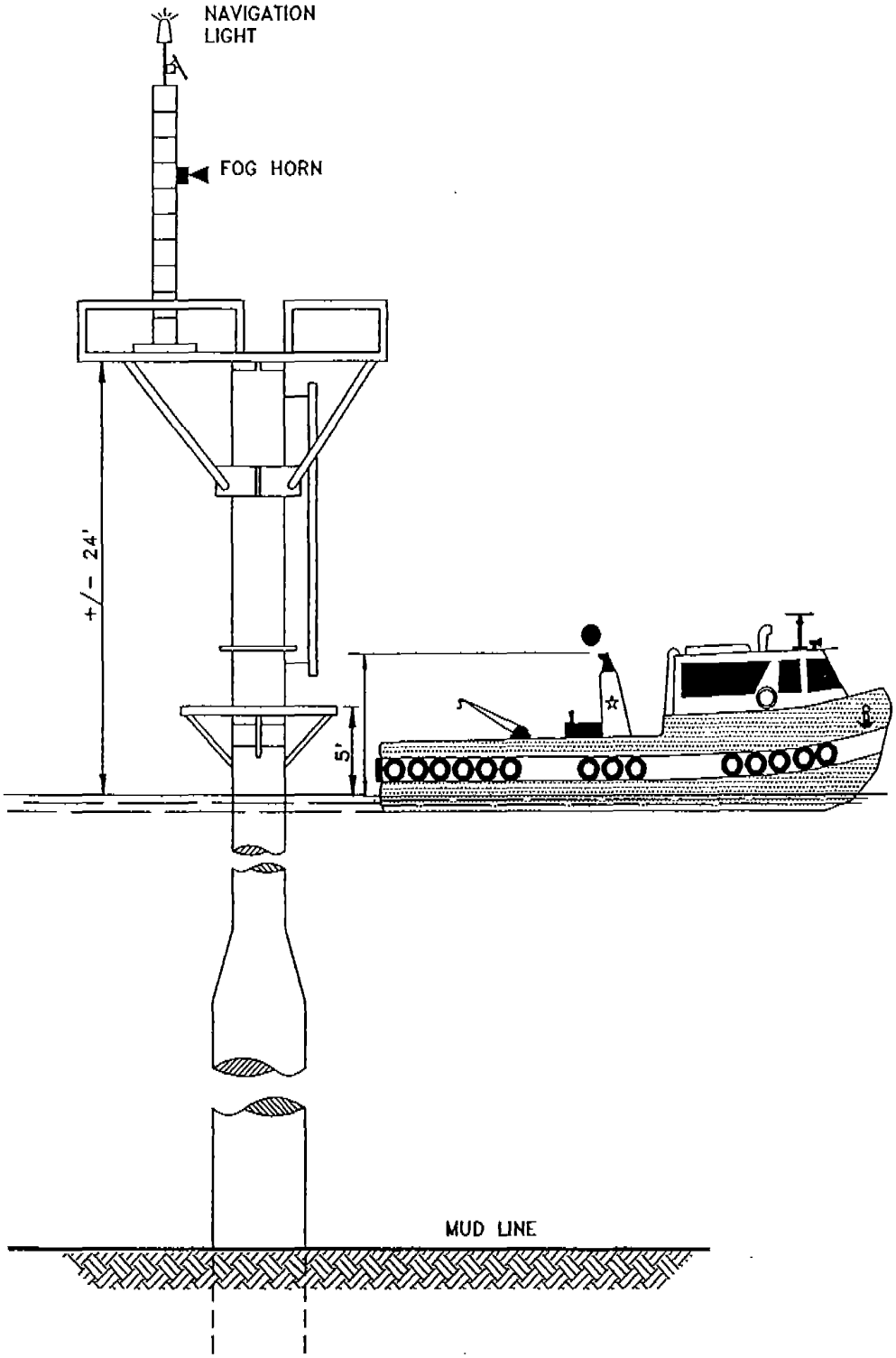
INITIAL DOCD
EAST CAMERON AREA- BLOCK 194
3000' 0' 3000' 6000'
SCALE IN FEET

TIM MORTON & ASSOCIATES, INC.
REGULATORY & ENVIRONMENTAL CONSULTANTS
LAFAYETTE, LOUISIANA

JOB # 02-188
MAP NO. EC194
REVISED
DATE 9/30/02

ATTACHMENT B

TYPICAL CAISSON



TYPICAL CAISSON WELL PROTECTOR

ATTACHMENT C

SHALLOW HAZARD REPORT

GEOLOGIC STRUCTURE MAPS

CROSS-SECTION MAP

BATHYMETRY MAP

UNION OIL COMPANY OF CALIFORNIA
OCS-G-22587
EAST CAMERON BLOCK 194
OFFSHORE LOUISIANA

SHALLOW HAZARD REPORT

East Cameron Block 194 Prospect

This memo was written in conclusion to my evaluation of East Cameron 194 for archaeological artifacts and subsurface geologic hazards at or near the proposed well locations.

East Cameron 194 7300' FWL and 2200' FNL

FURGO Geoservices and UNOCAL Corporation conducted a high resolution survey during August 2002 using the following equipment.

1. FURGO STARFIX DGPS
2. Marine Magnetics SeaSPY GSM-19MD Proton magnetometer.
3. EdgeTech SMS 260-TH 100 kHz side scan sonar.
4. Odom EchoTrac DF 3200 (200 kHz) echo sounder.
5. ORE model 140 3.5 kHz Pinger subbottom profiler.
6. OYO DAS-1 system 48 channel seismic recorder.
7. 90 cubic inch GI guns.
8. SeaBird Seacat SBE 19-01 velocimeter.
9. Sonar and Pinger data recorded with Sonar Wiz SSS/SBP recording system.

GEOPHYSICAL DISCUSSION

The seafloor of Block 194 is smooth with a seafloor gradient of about 2 feet/mile dipping towards the southwest. The seafloor is reported to be a mixture of sands and clayey sands. One fault downcutting from 0-5 feet below the surface lies about 250 feet from the proposed location. There are no indications of a shallow gas hazard at the proposed location. Water depths at the discussed location ranges between 98-99 feet. There are no magnetic anomalies within 600 feet of the proposed location.

CONCLUSION

In view of the above observations, we believe the proposed location can be drilled safely with minimum risk of disturbing any potential archaeological artifacts.

BY: Tom Catlett

Tom Catlett
Sr. Advising Geophysicist
Sept. 12, 2002

GEOLOGIC STRUCTURE MAPS

PROPRIETARY INFORMATION

CROSS-SECTION MAP

PROPRIETARY INFORMATION

BATHYMETRY MAP

PROPRIETARY INFORMATION

ATTACHMENT D

DRILLING FLUIDS LIST

MUD SYSTEM COMPONENT LISTING

PRODUCT NAME	APPLICATION	DESCRIPTION
Aluminum Stearate	Defoamer	Aluminum Stearate $Al(C_{18}H_{35}O_2)_3$
Bac Ban	Preservative	Isothiazolin mixture
Barabuf	PH control	Magnesium oxide
Calcium Chloride	Weighting Agent	Calcium Chloride $CaCl_2$
Cane Fiber	Loss Circulation	Sugar cane fiber (bagasse)
Caustic Potash	PH control	Potassium hydroxide (KOH)
Caustic Soda	PH control	Sodium hydroxide (NaOH)
Caustilig	Thinner	Causticized lignite
Cedar Fiber	Loss Circulation	Shredded cedar, cellulose
Congor 101	Corrosion Inhibitor	Blend of tall oil and alcohol
Congor 202	Corrosion Inhibitor	Blend of amines and alcohol
Congor 303	Corrosion Inhibitor	Blend of alkyl diamines
Congor 404	Corrosion Inhibitor	Salt of phosphate ester
Cottonseed Hulls	Loss Circulation	Cotton seed hulls
Defoam X	Defoamer	Blend of glycols and stearate
Desco	Thinner	Sulfomethylated tannin/dichromate
Diaseal M	Loss Circulation	Diatomaceous earth
Drillaid Selec Floc	Flocculant	Anionic polymer
Drispac	Fluid Loss Control	Cellulose Gum
Durogel	Viscosifier	Sepiolite clay
Fer-Ox	Weighting Agent	Iron oxide; hematite ($Fe_2 O_3$)
Flakes	Loss Circulation	Cellophane $(C_6 H_{10} O_5)_n$
Floxit	Flocculant	Polyacrylamide $(C_3 H_5 NO)_x$
Gelex	Viscosifier	Sodium polyacrylate
Gelite	Viscosifier	Saponite ($Al_2 MgO_8Si_2$)

Gypsum	Shale Control	Calcium sulfate ($CaSO_4.2H_2O$)
Ironite Sponge	Corrosion Inhibitor	Iron oxide ($Fe_2\ O_4$)
K-17	Thinner	Metal salt of lignite with potassium hydroxide
Kleen Up	Surfactant	Blend of surfactants
Kwik Seal	Loss Circulation	Blend of nut shells, cellophane and wood fibers
Kwik-Thik	Viscosifier	Bentonite, polyacryl-amide blend
Lime	PH Control	Calcium hydroxide [$Ca(OH)_2$]
Liquid $CaCl_2$	Weighting Agent	Calcium chloride, liquid ($CaCl_2$)
Lo-Wato	Weighting Agent	Calcium carbonate ($CaCO_3$)
Lube-106	Lubricant	Blend of alcohol and esters
Lube-153	Lubricant	
M-I Bar	Weighting Agent	Barium sulfate ($BaSO_4$)
M-I CMC	Fluid Loss Control	Sodium carboxymethy-cellulose
M-I Cal	Viscosifier	Sodiummontmorillonite (bentonite)
M-I Mica	Loss Circulation	Mica
Melanex-T	Thinner	Melanin polymer derivative
My-Lo-Jel	Fluid Loss Control	Pregelatinized starch
N-DRL HT	Viscosifier and Fluid Loss Control	Biopolymer
N-VIS P	Fluid Loss Control	Hyperproperlated starch
Nut Plug - All Grades	Loss Circulation	Ground nut shells
Oxygen Scavenger	Corrosion Inhibitor	Ammonium bisulfite solution
Pheno-seal	Loss Circulation	Chipped formica
Phos	Thinner	Sodium tetraphosphate
Pipelax	Spotting Fluid	Blend of surfactants dispersed in an aromatic process oil
Pipelax SF	Spotting Fluid	Blend of surfactants and low toxicity hydrocarbons
Polypac	Fluid Loss Control	A high grade carboxy-methyl cellulose

Poly-Plus (liquid)	Polymer	A liquid anionic polyelectrolyte with mineral oil
Polysal	Fluid Loss Control	A modified potato starch
Polyseal	Loss Circulation	A blend of mixed fibers and cellophane
Quebracho 60/40	Thinner	Tannin
Resinex	Fluid Loss Control	Copolymer of a lignite and a sulfonated phenol, formaldehyde urea resin
Safe Link	Viscosifier	A blend of salt, polymer and lignosulfonate
Salt	Weighting Agent	Sodium chloride (NaCl)
Salt Gel	Viscosifier	Attapulgite clay
SAPP	Thinner	Sodium acid pyrophosphate ($Na_2 H_2 P_2 O_7$)
Shale Chek	Shale Control	A blend of amines and glycol
Soda Ash	PH Control	Sodium carbonate ($Na_2 CO_3$)
Sodium Bicarbonate	PH Control	Sodium bicarbonate ($NaHCO_3$)
Soltex	Lubricant	Sodium asphalt sulfonate
SP-101	Fluid Loss Control	Sodium polyacrylate
Spersene	Thinner	Chrome lignosulfonate
Spersene CF	Thinner	Chrome free lignosulfonate
Sulf-X Plus	Corrosion Inhibitor	Zinc oxide blend
Tackle	Thinner	A polyacrylamide blend
Tannathin	Thinner	Oxidized lignite (naturally occurring)
Thermpac UL	Fluid Loss Control	Sodium carboxymethyl starch
XP-20	Thinner	Oxidized chrome lignite

NOTE:

The product names are from M-I Drilling Fluids. These product names may differ depending on the actual company selected to provide drilling fluid products.

ATTACHMENT E

COASTAL ZONE CONSISTENCY CERTIFICATION

ENVIRONMENTAL IMPACT ANALYSIS

AIR QUALITY SCREENING CHECKLIST

COASTAL ZONE MANAGEMENT CONSISTENCY CERTIFICATE

DEVELOPMENT OPERATIONS COORDINATION DOCUMENT

GULF OF MEXICO

FOR

EAST CAMERON AREA BLOCK 194

OCS-G-22587

SUBMITTED TO:

MR. TERRY COOK

UNION OIL COMPANY OF CALIFORNIA

14141 SOUTHWEST FREEWAY

SUGAR LAND, TEXAS 77478

(281/287-5538)

SEPTEMBER 26, 2002

PREPARED BY:

TIM MORTON & ASSOCIATES, INC.

REGULATORY & ENVIRONMENTAL CONSULTANTS

PROJECT NO. 02-188

COASTAL ZONE MANAGEMENT

CONSISTENCY CERTIFICATION

DEVELOPMENT/PRODUCTION

.....

Type of Plan

EAST CAMERON AREA BLOCK 194

.....

Area and Block

OCS-G-22587

.....

Lease Number

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

Arrangements have been made to publish Public Notices regarding the proposed activity no later than October 16, 2002 with THE ADVOCATE, the official journal of Louisiana, and with CAMERON PARISH PILOT, the official journal of Cameron Parish.

UNION OIL COMPANY OF CALIFORNIA

.....

Lessee or Operator

.....

Certifying Official

SEPTEMBER 30, 2002

Date

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

Applicant: Union Oil Company of California
14141 Southwest Freeway
Sugar Land, Texas 77478

Location: East Cameron Area, OCS-G-22587
Block 194

Description: Proposed Initial DOCD for East Cameron Area Block 194 provides for the development and production of hydrocarbons. Support activities are to be conducted from an onshore base located at Cameron, Louisiana. No ecologically sensitive species or habitats are expected to be located near or affected by these activities.

A copy of the plan described above is available for inspection at the Coastal Management Division Office located on the 10th floor of the LaSalle Building, 617 North 3rd Street, Baton Rouge, Louisiana. Office hours: 8:00 a.m. to 5:00 p.m., Monday through Friday. The public is requested to submit comments to the Coastal Management Division, Attention: OCS Plans, P. O. Box 44487, Baton Rouge, La. 70804-4487. Comments must be received within 15 days of the date of this notice or 15 days after the Coastal Management Division obtains a copy of the plan and it is available for public inspection. This public notice is provided to meet the requirements of the NOAA Regulations on Federal Consistency with approved Coastal Management Programs.

LOUISIANA COASTAL RESOURCES PROGRAM (LCRP)
STATEMENT OF FINDINGS REGARDING RELEVANT ENFORCEABLE POLICIES

GUIDELINES APPLICABLE TO ALL USES

Guideline 1.2 - Conformance with applicable water and air quality laws, standards and regulations, and with those other laws, standards and regulations which have been incorporated into the coastal resources program shall be deemed in conformance with the program except to the extent that these guidelines would impose additional requirements.

The discharges generated at the proposed well location by the drilling and production activities associated with this plan will be discharged upon successful bioassay test as per NPDES discharge guidelines. Solids wastes; typically paper, plastic, cloth, and metal, will be collected and transported to shore for disposal at an approved disposal facility. Solid wastes generated from the transportation vessels, normally just garbage, will be collected and returned to shore for disposal with the drilling rig refuse. Scrap metal and other metal wastes will be recycled or sold as scrap and will not be shipped to a disposal facility with the other refuse. Sanitary wastes will be treated in approved marine sanitation devices as required by the Clean Water Act. All biodegradable wastes, such as kitchen food scraps, will be comminuted or ground and discharged in accordance with Annex V of MARPOL 73/78. Hazardous wastes from the drilling rig, such as paint, or paint thinner, will be collected in sealed metal containers and transported to an approved disposal site in accordance with RCRA guidelines. All operations will be covered by a Minerals Management Service approved Oil Spill Response Plan. All applicable Federal, State, and local requirements regarding air emissions, water quality, and discharge for the proposed activities, as well as any other permit conditions, will be complied with.

An Air Quality Screening Checklist was prepared and included in Attachment E of the Development Operations Coordination Document (DOCD). An Air Quality Report was not required for the proposed activities. Therefore, the ambient air quality of Louisiana's coastal zone will not be adversely affected.

Guideline 1.6 - Information regarding the following general factors shall be utilized by the permitting authority in evaluating whether the proposed use is in compliance with the guidelines.

a. type, nature and location of use.

Activities proposed in the DOCD will occur in offshore waters.

b. elevation, soil and water conditions and flood and storm hazard characteristics of site.

Not applicable.

c. techniques and materials used in construction, operation and maintenance of use.

Not applicable.

d. existing drainage patterns and water regimes of surrounding area including flow, circulation, quality, quantity, and salinity; and impacts on them.

Not applicable.

e. availability of feasible alternative sites or methods for implementing the use.

Not applicable.

f. designation of the area for certain uses as part of a local program.

Not applicable.

g. economic need for use and extent of impacts of use on economy of locality.

Not applicable.

h. extent of resulting public and private benefits.

Not applicable.

i. extent of coastal water dependency of the use.

Union Oil Company of California (Unocal) will operate out of their service base facilities established in Cameron, Louisiana. Transportation vessels will utilize the most direct route from the Cameron service base to the activity location.

j. existence of necessary infrastructure to support the use and public costs resulting from use.

Unocal will operate out of their service base facilities established in Cameron, Louisiana. There will be no public cost resulting from the proposed activity.

k. extent of impacts on existing and traditional uses of the area and on future uses for which the area is suited.

Not applicable.

l. proximity to and extent of impacts on important natural features such as beaches, barrier islands, tidal passes, wildlife and aquatic habitats, and forest lands.

The proposed activities will occur approximately 55 miles from the coast of Cameron Parish, Louisiana. The greatest threat to the natural environment including beaches, barrier islands, tidal passes, wildlife and aquatic habitats is caused by inadequate operational safeguards that may cause or contribute to an oil spill or well blowout. These accidents can be greatly reduced in number by utilizing trained operational personnel and employing all available safety and pollution control systems. These measures are standard operating procedure for Unocal. Unocal has an approved Oil Spill Response Plan. No impacts to important natural features are anticipated.

m. the extent to which regional, state and national interests are served including the national interest in resources and the siting of facilities in the coastal zones as identified in the coastal resources program.

Not applicable.

n. proximity to, and extent of impacts on, special areas, particular areas, or other areas of particular concern of the state program or local programs.

The proposed activities will occur approximately 55 miles from the coast of Cameron Parish, Louisiana. No impacts to special areas, particular areas, or other areas of particular concern of the state program or local programs are anticipated.

o. likelihood of, and extent of impacts of, resulting secondary impacts and cumulative impacts.

There are no secondary or cumulative impact anticipated as a result of the proposed activities.

p. proximity to and extent of impacts on public lands or works, or historic, recreational or cultural resources.

The proposed activities will occur approximately 55 miles from the coast of Cameron Parish, Louisiana. No impacts on public lands or works, or historic, recreational or cultural resources are anticipated.

q. extent of impacts on navigation, fishing, public access, and recreational opportunities.

Navigation, fishing, public access and recreational opportunities would be affected by OCS development, but primarily in terms of inconvenience and interference. Petroleum platforms provide recreation for fishermen and scuba divers because they act as artificial reefs attracting and establishing aquatic communities including highly sought after food and sport fishes. The reef effect created by petroleum platforms is well known and is evidenced by the numerous private boat owners who regularly fish at offshore facilities. Offshore rigs and platforms serve as navigation points for small commercial and recreational marine craft. Manned drilling rigs and platforms can also provide a haven for small craft operators forced to abandon their vessels during storms. The installation and use of navigational aids, lifesaving equipment, and other safety requirements pursuant to Coast Guard regulations are standard procedure for production platforms and marine vessels utilized by Unocal.

r. extent of compatibility with natural and cultural setting.

Not applicable.

s. extent of long term benefits or adverse impacts.

Not applicable.

Guideline 1.7 - **It is the policy of the coastal resources program to avoid the following adverse impacts. To this end, all uses and activities shall be planned, sited, designed, constructed, operated and maintained to avoid to the maximum extent practicable significant:**

a. reductions in the natural supply of sediment and nutrients to the coastal system by alterations of freshwater flow.

Not applicable.

b. adverse economic impacts on the locality of the use and affected governmental bodies.

Not applicable.

c. detrimental discharges of inorganic nutrient compounds into coastal waters.

Not applicable.

d. alterations in the natural concentration of oxygen in coastal waters.

The greatest threat to the natural concentration of oxygen in coastal waters is caused by inadequate operational safeguards that may cause or contribute to an oil spill or well blowout. These accidents can be greatly reduced in number by utilizing trained operational personnel and employing all available safety and pollution control systems. These measures are standard operating procedure for Unocal. Unocal has an approved Oil Spill Response Plan. No impacts to the natural concentration of oxygen in coastal waters are anticipated.

e. destruction or adverse alterations of streams, wetland, tidal passes, inshore waters and waterbottoms, beaches, dunes, barrier islands, and other natural biologically valuable areas or protective coastal features.

No destruction or adverse alterations of streams, wetland, tidal passes, inshore waters and waterbottoms, beaches, dunes, barrier islands, or other natural biologically valuable areas or protective coastal features are anticipated.

f. adverse disruption of existing social patterns.

Not applicable.

g. alterations of the natural temperature regime of coastal waters.

No alterations of the natural temperature regime of coastal waters are anticipated.

h. detrimental changes in existing salinity regimes.

No detrimental changes in existing salinity regimes are anticipated.

i. detrimental changes in littoral and sediment transport processes.

Not applicable

j. adverse effects of cumulative impacts.

No cumulative impacts are anticipated.

k. detrimental discharges of suspended solids into coastal waters, including turbidity resulting from dredging.

Not applicable.

l. reductions or blockage of water flow or natural circulation patterns within or into an estuarine system or a wetland forest.

Not applicable.

m. discharges of pathogens or toxic substances into coastal waters.

No discharges of pathogens or toxic substances into coastal waters are anticipated.

n. adverse alteration or destruction of archaeological, historical or biologically highly productive wetland areas.

The area of proposed activities falls within the zone designated as an area with a high probability of pre-historic archeological resources. An Archeological and Shallow Hazards Report for a portion of East Cameron Area Block 194 was prepared by Fugro Geoservices, Inc. in September 2002, and the following was extracted from that report:

The following conclusions and recommendations should be considered during drilling and construction planning within the study area:

- Bathymetric contours indicate a smooth seafloor within the survey area.
- Caution should be used when working in the vicinity of the man-made features, the 8 unidentified magnetic anomalies, and two seafloor faults.
- The pinger data records buried channels that were interspersed with to flood plain deposits and natural levees. The channels margins downcut from 0 to 5-feet below the seafloor. Due to the potential variance in geotechnical properties between the channel-fill material and surrounding sediments, bottom-supported structures utilizing independent jack-up legs should not straddle channel margins.
- There are no seismic amplitude anomalies (bright spots) observed on the analog digital air gun records. The interpretation of seismic amplitude anomalies is a subjective process. Therefore, the air gun data and any available relative amplitude processed seismic data collected in the vicinity of proposed well locations should be inspected for possible high pressure gas zones.
- Results of this shallow hazards assessment should be considered when selecting future well sites. A detailed hazards assessment should be prepared for each proposed well site to determine specific conditions for exploratory drilling.
- No high probability areas for prehistoric archeological sites were recorded in the near seafloor sediments in the pinger profiles.
- Late Pleistocene/early Holocene fluvial channel deposits were noted in the pinger profiles. The upper margins and tops of the channel fill deposits appear truncated by erosion, and in situ prehistoric archeological sites are unlikely to be present. While cultural remains may have been

incorporated into the alluvial fill, no specific high probability areas for prehistoric archeological sites were noted within the boundaries of the channels. There are no unidentified sonar targets. The eight unidentified magnetic anomalies are interpreted as probable modern debris from previous shipping, oil and gas development, or fishing activities.

- It is possible that historic shipwrecks materials may be obscured by modern debris and may not be detected by the geophysical instruments. If wooden planking or other evidence of shipwreck remains is encountered, the work should be halted and the archeologists contacted at the USDI MMS in New Orleans to determine the possible historic significance of these artifacts.

No adverse alteration or destruction of highly productive wetland areas are anticipated.

o. fostering of detrimental secondary impacts in undisturbed or biologically highly productive wetland areas.

No fostering of detrimental secondary impacts in undisturbed or biologically highly productive wetland areas are anticipated.

p. adverse alteration or destruction of unique or valuable habitats, critical habitat for endangered species, important wildlife or fishery breeding or nursery areas, designated wildlife management or sanctuary areas, or forest lands.

No adverse alteration or destruction of unique or valuable habitats, critical habitat for endangered species, important wildlife or fishery breeding or nursery areas, designated wildlife management or sanctuary areas, or forest lands are anticipated.

a. adverse alteration or destruction of public parks, shoreline access points, public works, designated recreation areas, scenic rivers, or other areas of public use and concern.

No adverse alteration or destruction of public parks, shoreline access points, public works, designated recreation areas, scenic rivers, or other areas of public use and concern are anticipated.

b. adverse disruptions of coastal wildlife and fishery migratory patterns.

No adverse disruptions of coastal wildlife and fishery migratory patterns are anticipated.

c. land loss, erosion and subsidence.

Not applicable.

d. increases in the potential for flood, hurricane or other storm damage, or increases in the likelihood that damage will occur from such hazards.

Not applicable.

e. reductions in the long term biological productivity of the coastal ecosystem.

No reductions in the long term biological productivity of the coastal ecosystem are anticipated.

Guideline 1.9 - Uses shall to the maximum extent practicable be designed and carried out to permit multiple concurrent uses which are appropriate for the location and to avoid unnecessary conflicts with other uses of the vicinity.

Not applicable.

GUIDELINES FOR LINEAR FACILITIES

Guideline 3.1 - Linear use alignments shall be planned to avoid adverse impacts on areas of high biological productivity or irreplaceable resource areas.

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.2 - Linear facilities involving the use of dredging or filling shall be avoided in wetland and estuarine areas to the maximum extent practicable.

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.3 - Linear facilities involving dredging shall be of the minimum practical size and length.

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.4 - To the maximum extent practicable, pipelines shall be installed through the "push ditch" method and the ditch backfilled.

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.5 - Existing corridors, rights-of-way, canals, and streams shall be utilized to the maximum extent practicable for linear facilities.

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.6 - **Linear facilities and alignments shall be, to the maximum extent practicable, designed and constructed to permit multiple uses consistent with the nature of the facility.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.7 - **Linear facilities involving dredging shall not traverse or adversely affect any barrier island.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.8 - **Linear facilities involving dredging shall not traverse beaches, tidal passes, protective reefs, or other natural gulf shoreline unless no other alternatives exists. If a beach, tidal pass, reef or other gulf shoreline must be traversed for a non-navigation canal, they shall be restored at least to their natural condition immediately upon completion of construction. Tidal passes shall not be permanently widened or deepened except when necessary to conduct the use. The best available restoration techniques which improve the traversed area's ability to serve as a shoreline shall be used.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.9 - **Linear facilities shall be planned, designed, located and built using the best practical techniques to minimize disruption of natural hydrologic and sediment transport patterns, sheet flow, and water quality, and to minimize adverse impacts on wetlands.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.10 - **Linear facilities shall be planned, designed, and built using the best practical techniques to prevent bank slumping and erosion, saltwater intrusion, and to minimize the potential for inland movement of storm-generated surges. Consideration shall be given to the use of locks in navigation canals and channels which connect more saline areas with fresher areas.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.11 - **All non-navigation canals, channels and ditches which connect more saline areas with fresher areas shall be plugged at all waterway crossing and at intervals between crossings in order to compartmentalize them. The plugs shall be properly maintained.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.12 - **The multiple use of existing canals, directional drilling and other practical techniques shall be utilized to the maximum extent practicable to minimize the number and size of access canals, to minimize changes of natural systems and to minimize adverse impacts on natural areas and wildlife and fisheries habitat.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.13 - **All pipelines shall be constructed in accordance with parts 191, 192, and 195 of Title 49 of the Code of Federal Regulations, as amended, and in conformance with the Commissioner of Conservation's Pipeline Safety Rules and Regulations and those safety requirements established by La. R.S. 45:408, whichever would require higher standards.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.14 - **Areas dredged for linear facilities shall be backfilled or otherwise restored to the pre-existing conditions upon cessation of use for navigation purposes to the maximum extent practicable.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.15 - **The best practical techniques for site restoration and revegetation shall be utilized for all linear facilities.**

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

Guideline 3.16 - Confined and dead end canals shall be avoided to the maximum extent practicable. Approved canals must be designed and constructed using the best practical techniques to avoid water stagnation and eutrophication.

If the well is successful, Unocal proposes to install approximately 17,400 feet of six inch pipeline from the proposed caisson located in East Cameron Area Block 194 to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. No linear facilities will be installed in the Louisiana Coastal Zone.

GUIDELINES FOR DREDGED SPOIL DEPOSITION

Guideline 4.1 - Spoil shall be deposited utilizing the best practical techniques to avoid disruption of water movement, flow, circulation and quality.

No dredging activities are proposed in the Louisiana Coastal Zone.

Guideline 4.2 - Spoil shall be used beneficially to the maximum extent practicable to improve productivity or create new habitat, reduce or compensate for environmental damage done by dredging activities, or prevent disposal shall be utilized to the maximum extent practicable rather than creating new disposal areas.

No dredging activities are proposed in the Louisiana Coastal Zone.

Guideline 4.3 - Spoil shall not be disposed of in a manner which could result in the impounding or draining of wetlands or the creation of development sites unless the spoil deposition is part of an approved levee or land surface alteration project.

No dredging activities are proposed in the Louisiana Coastal Zone.

Guideline 4.4 - Spoil shall not be disposed of on marsh, known oyster or clam reefs or in areas of submersed vegetation to the maximum extent practicable.

No dredging activities are proposed in the Louisiana Coastal Zone.

Guideline 4.5 - Spoil shall not be disposed of in such a manner as to create a hindrance to navigation or fishing, or hinder timber growth.

No dredging activities are proposed in the Louisiana Coastal Zone.

Guideline 4.6 - Spoil disposal areas shall be designed and constructed and maintained using the best practical techniques to retain the spoil at the site, reduce turbidity, and reduce shoreline erosion when appropriate.

No dredging activities are proposed in the Louisiana Coastal Zone.

Guideline 4.7 - **The alienation of state-owned property shall not result from spoil deposition activities without the consent of the Department of Natural Resources.**

No dredging activities are proposed in the Louisiana Coastal Zone.

GUIDELINES FOR SURFACE ALTERATIONS

Guideline 6.1 - **Industrial, commercial, urban, residential, and recreational uses are necessary to provide adequate economic growth and development. To this end, such uses will be encouraged in those areas of the coastal zone that are suitable for development. Those uses shall be consistent with the other guidelines and shall, to the maximum extent practicable, take place only:**

a. **on lands five feet or more above sea level or within fast lands; or**
b. **on lands which have foundation conditions sufficiently stable to support the use, and where flood and storm hazards are minimal or where protection from these hazards can be reasonably well achieved, and where the public safety would not be unreasonably endangered; and**

    1) **the land is already in high intensity of development use, or**
    2) **there is adequate supporting infrastructure, or**
    3) **the vicinity has a tradition of use for similar habitation or development**

No surface alterations within the Louisiana Coastal Zone are proposed.

GUIDELINES FOR HYDROLOGIC AND SEDIMENT TRANSPORT MODIFICATIONS

Guideline 7.1 - **The controlled diversion of sediment-laden waters to initiate new cycles of marsh building and sediment nourishment shall be encouraged and utilized whenever such diversion will enhance the viability and productivity of the outfall area. Such diversions shall incorporate a plan for monitoring and reduction and/or amelioration of the effects of pollutants present in the freshwater source.**

Proposed activities will not result in the creation of sediment-laden waters.

Guideline 7.3 - **Undesirable deposition of sediments in sensitive habitat or navigation areas shall be avoided through the use of the best preventive techniques.**

Proposed activities will not result in deposition of sediments within the Louisiana Coastal Zone.

Guideline 7.9 - **Withdrawal of surface and ground water shall not result in saltwater intrusion or land subsidence to the maximum extent practicable.**

Proposed activities will not result in the withdrawal of surface and ground water.

GUIDELINES FOR DISPOSAL OF WASTES

Guideline 8.1 - The location and operation of waste storage, treatment, and disposal facilities shall be avoided in wetlands to the maximum extent practicable, and best practical techniques shall be used to minimize adverse impacts which may result from such use.

Waste disposal associated with the proposed activities will utilize existing facilities.

Guideline 8.2 - The generation, transportation, treatment, storage and disposal of hazardous wastes shall be pursuant to the substantive requirements of the Department of Natural Resources adopted pursuant to Act 334 of 1978 and approved pursuant to the Resource Conservation and Recovery Act of 1978 P. L. 94-580, and of the Office of Conservation for injection below surface.

Any materials that may contain oil or other hazardous materials, and therefore would have a much greater adverse impact on the environment, will not be discharged intentionally. Any discharging will be done pursuant to all Department of Natural Resources, Department of Interior, Office of Conservation and Environmental Protection Agency regulations. The discharges to be disposed overboard as a result of the production activity will include produced water and domestic waste and sewage that is treated on the platform.

Guideline 8.8 - Wastes shall be disposed of only at approved disposal sites.

Wastes associated with the proposed activities will be disposed of only at approved disposal sites.

Guideline 8.9 - Radioactive wastes shall not be temporarily or permanently disposed of in the coastal zone.

No radioactive wastes associated with the proposed activities are anticipated.

GUIDELINES FOR USES THAT RESULT IN THE ALTERNATION OF WATERS DRAINING INTO COASTAL WATERS

Guideline 9.2 - Runoff from developed areas shall to the maximum extent practicable be managed to simulate natural water patterns, quantity, quality and rate of flow.

No runoff associated with the proposed activities is anticipated.

GUIDELINES FOR OIL, GAS, AND OTHER MINERAL ACTIVITIES

Guideline 10.3 - Exploration, production and refining activities shall, to the maximum extent practicable, be located away from critical wildlife areas and vegetation areas. Mineral operations in wildlife preserves and management areas shall be conducted in strict accordance with the requirements of the wildlife management body.

Proposed activities are located away from critical wildlife areas and vegetation areas.

Guideline 10.5 - Access routes to mineral exploration, production and refining sites shall be designed and aligned so as to avoid adverse impacts on critical wildlife and vegetation areas to the maximum extent practicable.

Transportation vessels will utilize existing waterways to access the location of proposed activities. No adverse impacts on critical wildlife and vegetation areas are anticipated.

Guideline 10.6 - Drilling and production sites shall be prepared, constructed, and operated using the best practical techniques to prevent the release of pollutants or toxic substances into the environment.

The discharges generated at the proposed well location by the drilling and production activities associated with this plan will be discharged upon successful bioassay test as per NPDES discharge guidelines. Solids wastes; typically paper, plastic, cloth, and metal, will be collected and transported to shore for disposal at an approved disposal facility. Solid wastes generated from the transportation vessels, normally just garbage, will be collected and returned to shore for disposal with the drilling rig refuse. Scrap metal and other metal wastes will be recycled or sold as scrap and will not be shipped to a disposal facility with the other refuse. Sanitary wastes will be treated in approved marine sanitation devices as required by the Clean Water Act. All biodegradable wastes, such as kitchen food scraps, will be comminuted or ground and discharged in accordance with Annex V of MARPOL 73/78. Hazardous wastes from the drilling rig, such as paint, or paint thinner, will be collected in sealed metal containers and transported to an approved disposal site in accordance with RCRA guidelines. All operations will be covered by a Minerals Management Service approved Oil Spill Response Plan. All applicable Federal, State, and local requirements regarding air emissions, water quality, and discharge for the proposed activities, as well as any other permit conditions, will be complied with.

Guideline 10.10 - Mineral exploration, production and refining facilities shall be designed and constructed using best practical techniques to minimize adverse environmental impacts.

Exploration and production facilities associated with the proposed activities have been designed and constructed using industry standards that minimize adverse environmental impacts.

Guideline 10.11 - Effective environmental protection and emergency or contingency plans shall be developed and complied with for all mineral operations.

All operations will be covered by a Minerals Management Service approved Oil Spill Response Plan.

Environmental Impact Analysis

East Cameron Area
Block 194
OCS-G-22587

September 26, 2002

Prepared for Union Oil Company of California
by Tim Morton & Associates, Inc.

Filename: C:\MyFiles\WPmms\EIAEC194.uoc.wpd

Table of Contents

I. Description of the Proposed Activity

This environmental impact analysis addresses the activity proposed by Union Oil Company of California (Unocal) for East Cameron Area Block 194 (OCS-G-22587). The approximate location of the activity is presented on a general vicinity map of the Outer Continental Shelf (OCS) lease areas off the coast of Louisiana (Figure 1).

Unocal proposes utilize a jack-up rig to drill one well in East Cameron Area Block 194. If the well is successful, Unocal proposes to install a single well caisson at the surface location of the proposed well. A pipeline will be installed from the caisson to Forest Oil Corporation's existing platform located in East Cameron Area Block 195. Hydrocarbons will be transported from this platform to shore via an existing pipeline gathering system. More specific information can be found in the attached Development Operations Coordination Document (DOCD).

The proposed activities will be carried out by Unocal with a guarantee of the following:

- The best available and safest technologies will be utilized throughout the projects. This includes meeting all applicable requirements for equipment types, general project layout, safety systems, equipment and monitoring systems.
- All operations will be covered by a Minerals Management Service (MMS) approved Oil Spill Response Plan.
- All applicable Federal, State, and local requirements regarding air emissions, water quality, and discharge for the proposed activities, as well as any other permit conditions, will be complied with.

II. Impact-Producing Factors

A. Site-specific at Offshore Location

1. Designated Topographic Features

All proposed bottom-disturbing activities are outside the 3-mile zone of any identified topographic feature.

2. Pinnacle Trend Area Live Bottoms

All proposed bottom-disturbing activities are outside 100 feet of any pinnacle trend

3. Eastern Gulf Live Bottoms

Not Applicable

4. Chemosynthetic Communities

Activities proposed in this DOCD will not impact any deepwater chemosynthetic communities as the water depth at the surface location of the proposed well is 98 feet.

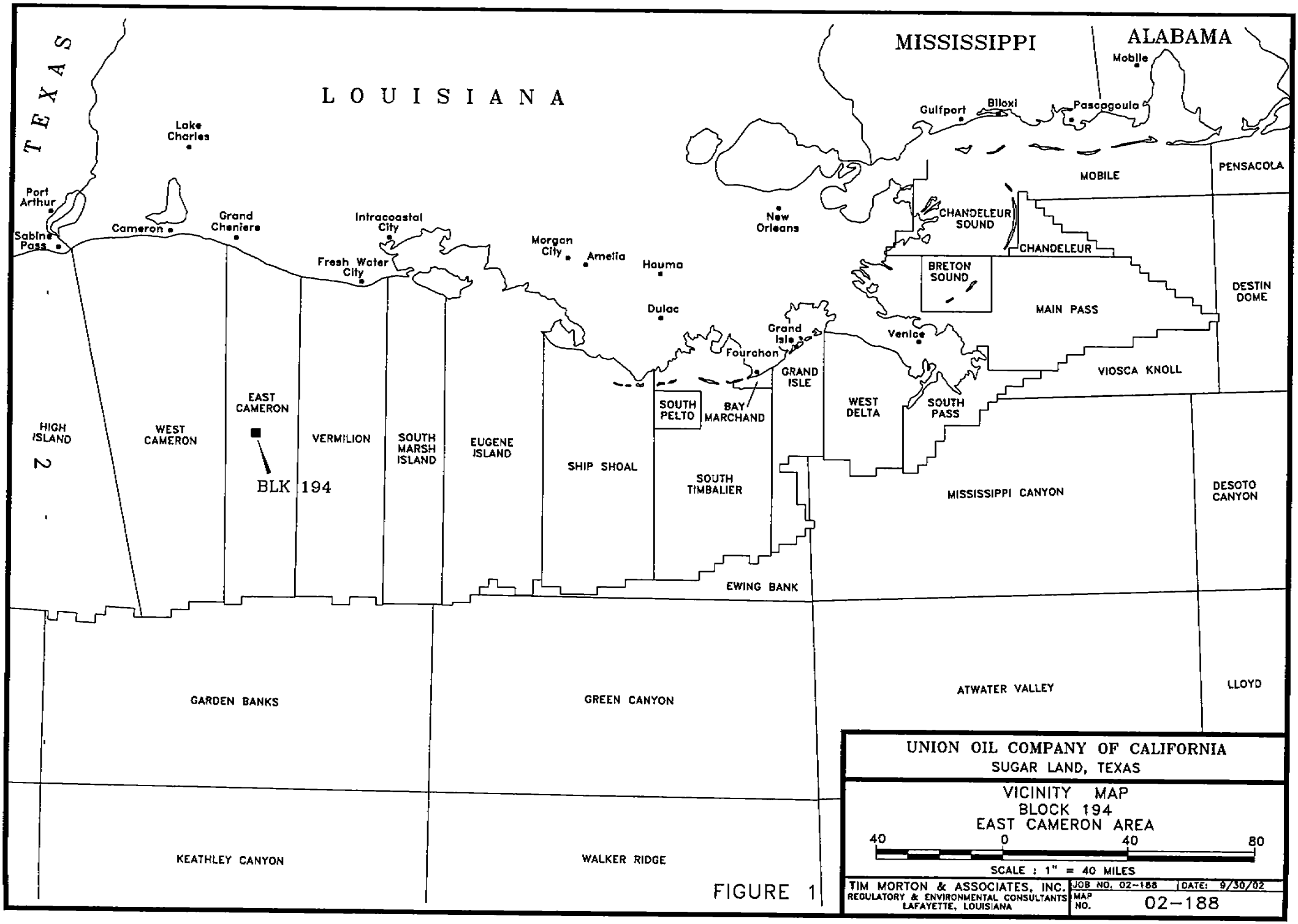


FIGURE 1

UNION OIL COMPANY OF CALIFORNIA
SUGAR LAND, TEXAS

VICINITY MAP
BLOCK 194
EAST CAMERON AREA

40 0 40 80

SCALE : 1" = 40 MILES

TIM MORTON & ASSOCIATES, INC.
REGULATORY & ENVIRONMENTAL CONSULTANTS
LAFAYETTE, LOUISIANA

JOB NO. 02-188 | DATE: 9/30/02

MAP NO. 02-188

5. Water Quality

The major sources of ocean dumping related to OCS petroleum exploration activity are drilling fluids, or "muds", and drill cuttings. After the drilling and completion activities in East Cameron Area Block 194 are completed, Unocal does anticipate dumping their excess water-based drilling fluids. If any oil-based mud is used in the drilling operations, it will be transported to shore for proper disposal.

Drill cuttings are brought up by the drilling mud and range in size from grains of sand to pebbles. These cuttings are separated and sifted and then disposed overboard. Treated domestic wastes and drill waters will also be disposed at the proposed drilling site.

The major sources of ocean dumping related to the proposed production activity will be the discharge of produced water and treated domestic wastes. There will be no intentional discharge of any oily or hazardous materials in violation of DOI or EPA regulations.

6. Fisheries

No adverse impacts to fisheries are anticipated as a result of the proposed activities.

7. Marine Mammals

Endangered or threatened marine mammal species which might occur in the Gulf of Mexico are West Indian manatee (Trichechus manatus), northern right whale (Eubalaena glacialis), fin whale (Balaenoptera physalus), humpback whale (Megaptera novaeangliae), sei whale (B. borealis), sperm whale (Physeter macrocephalus), and blue whale (B. musculus) (USDOI, Region IV Endangered Species Notebook). No adverse impacts to endangered or threatened marine mammals are anticipated as a result of the proposed activities.

8. Sea Turtles

Endangered or threatened sea turtle species which might occur in the Gulf of Mexico are Kemp's ridley turtle (Lepidochelys kempii), green turtle (Chelonia mydas), hawksbill turtle (Eretmochelys imbricata), leatherback turtle (Dermochelys coriacea), and loggerhead turtle (Caretta caretta) (USDOI, Region IV Endangered Species Notebook). No adverse impacts to endangered or threatened sea turtles are anticipated as a result of the proposed activities.

9. Air Quality

An Air Quality Screening Checklist was prepared and included in Attachment E of the DOCD. An Air Quality Report was not required for the proposed activities.

10. Shipwreck Sites (known or potential)

The area of proposed activities falls within the zone designated as an area with a high probability of pre-historic archeological resources. An Archeological and Shallow Hazards Report for a portion of East Cameron Area Block 194 was prepared by Fugro Geoservices, Inc. in September 2002, and the following was extracted from that report:

The following conclusions and recommendations should be considered during drilling and construction planning within the study area:

It is possible that historic shipwrecks materials may be obscured by modern debris and may not be detected by the geophysical instruments. If wooden planking or other evidence of shipwreck remains is encountered, the work should be halted and the archeologists contacted at the USDI MMS in New Orleans to determine the possible historic significance of these artifacts.

11. Prehistoric Archaeological Sites

The area of proposed activities falls within the zone designated as an area with a high probability of pre-historic archeological resources. An Archeological and Shallow Hazards Report for a portion of East Cameron Area Block 194 was prepared by Fugro Geoservices, Inc. in September 2002, and the following was extracted from that report:

The following conclusions and recommendations should be considered during drilling and construction planning within the study area:

- Bathymetric contours indicate a smooth seafloor within the survey area.

- Caution should be used when working in the vicinity of the man-made features, the 8 unidentified magnetic anomalies, and two seafloor faults.

- The pinger data records buried channels that were interspersed with to flood plain deposits and natural levees. The channels margins downcut from 0 to 5-feet below the seafloor. Due to the potential variance in geotechnical properties between the channel-fill material and surrounding sediments, bottom-supported structures utilizing independent jack-up legs should not straddle channel margins.

- There are no seismic amplitude anomalies (bright spots) observed on the analog digital air gun records. The interpretation of seismic amplitude anomalies is a subjective process. Therefore, the air gun data and any available relative amplitude processed seismic data collected in the vicinity of proposed well locations should be inspected for possible high pressure gas zones.

- Results of this shallow hazards assessment should be considered when selecting future well sites. A detailed hazards assessment should be prepared for each proposed well site to determine specific conditions for exploratory drilling.

- No high probability areas for prehistoric archeological sites were recorded in the near seafloor sediments in the pinger profiles.

- Late Pleistocene/early Holocene fluvial channel deposits were noted in the pinger profiles. The upper margins and tops of the channel fill deposits appear truncated by erosion, and in situ prehistoric archeological sites are unlikely to be present. While cultural remains may have been incorporated into the alluvial fill, no specific high probability areas for prehistoric archeological sites were noted within the boundaries of the channels. There are no unidentified sonar targets. The eight unidentified magnetic anomalies are interpreted as probable modern debris from previous shipping, oil and gas development, or fishing activities.

- It is possible that historic shipwrecks materials may be obscured by modern debris

and may not be detected by the geophysical instruments. If wooden planking or other evidence of shipwreck remains is encountered, the work should be halted and the archeologists contacted at the USDI MMS in New Orleans to determine the possible historic significance of these artifacts.

B. Vicinity of Offshore Location

1. Essential Fish Habitat

No adverse impacts to essential fish habitat are anticipated as a result of the proposed activities.

2. Marine and Pelagic Birds

No adverse impacts to marine and pelagic birds are anticipated as a result of the proposed activities.

3. Public Health and Safety

Proposed activities will occur approximately 55 miles from the coast of Cameron Parish, Louisiana. No adverse impacts to public health and safety are anticipated.

C. Coastal and Onshore

1. Beaches

No adverse impacts to beaches are anticipated as a result of the proposed activities.

2. Wetlands

No adverse impacts to wetlands are anticipated as a result of the proposed activities.

3. Shore Birds and Coastal Nesting Birds

No adverse impacts to shore birds and coastal nesting birds are anticipated as a result of the proposed activities.

4. Wilderness Areas

No adverse impacts to wilderness areas are anticipated as a result of the proposed activities.

III. Literature Cited

Fugro Geoservices, Inc.

2002 Archeological and Shallow Hazards Report, 6,000 X 6,000 - Foot Portion of Block 194 (OCS-G-22587), East Cameron Area. Report No. 2402-1188.

U. S. Department of the Interior, Fish and Wildlife Service

1976 Endangered and threatened species of the southeastern United States. Region IV, Atlanta, Georgia (periodically updated).

DOCD AIR QUALITY SCREENING CHECKLIST

OMB Control No. xxxx-xxxx
Expiration Date: Pending

COMPANY	Union Oil Company of California
AREA	East Cameron
BLOCK	194
LEASE	OCS-G-22587
PLATFORM	Caisson
WELL	No. 1
COMPANY CONTACT	Terry Cook
TELEPHONE NO.	281/287-5538
REMARKS	

"Yes"	"No"	Air Quality Screening Questions
	No	1. Is the concentration of H_2S expected greater than 20 ppm?
	No	2. Is the burning of produced liquids proposed?
	No	3. Is gas flaring or venting which would require Regional Supervisor of Production and Development approval under Subpart K proposed?
	No	4. Does the facility process production from 8 or more active wells?
	No	5. Is the facility within 200km of the Breton Area?
	No	6. Will the proposed activity be collocated at (same surface location), or bridge attached to, a previously approved facility?
	No	7. Is the proposed activity within 25 miles of shore?
	No	8. Are semi-submersible activities involved and is the facility within 75 miles of shore?
	No	9. Are drillship operations involved and is the facility within 145 miles of shore?

If ALL questions are answered "No":
Fill in the information below about your lease term pipelines and submit only this coversheet with your plan.

If ANY question is answered "Yes":
Prepare and submit a full set of spreadsheets with your plan.

LEASE TERM PIPELINE CONSTRUCTION INFORMATION:		
YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS
2002		
2003		
2004		
2005		
2006		
2007		
2008		
2009		
2010		
2011		
2012		