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

ES/SR Nos. 03-199 and 200

Assessment of the Environmental Impacts
of the Proposal to Remove Platforms A and A-Prod. in
Eugene Island Area (South Addition) Area, Block 322
Lease OCS-G 02113
by BP Exploration and Production Company

Date Submitted: November 10, 2003

Commencement Date: November 14, 2003

Prepared by:

Warren J. Barton

Environmental Scientist

SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT/FONSI/EIS DETERMINATION

BP Exploration and Production Company's applications to use non-explosive means to remove Platforms A and A-Prod. in Eugene Island Area (South Addition), Block 322, OCS-G 02113, have been reviewed. Our SEA, ES/SR 03-199 and 200, on the subject actions is complete and results in a Finding of No Significant Impact. Based on the conclusions of the SEA, there is no evidence to indicate that the proposed actions will significantly (40 CFR 1508.27) affect the quality of the human environment. Preparation of an environmental impact statement is not required. Mitigation is imposed to ensure environmental protection, consistent environmental policy and safety as required by the National Environmental Policy Act (NEPA), as amended; or measures needed for compliance with 40 CFR 1500.2(f) regarding the requirement for Federal agencies to avoid or minimize any possible adverse affects of their actions upon the quality of the human environment.

Jerry Schlicht

Chief, Project Management Section
Leasing and Environment, GOM OCS Region

11/13/03

Date

INTRODUCTION AND BACKGROUND

The purpose of this Site-Specific Environmental Assessment (SEA) is to assess the specific impacts associated with proposed structure-removal activities. This SEA implements the tiering process outlined in 40 CFR 1502.20, which encourages agencies to tier environmental documents and eliminates repetitive discussions of the same issue. The SEA is based on a Programmatic Environmental Assessment (PEA) (USDOI, 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 [OCS]). This SEA conforms to the Minerals Management Service (MMS) and other appropriate guidelines for preparing environmental assessments by tiering to the PEA, to the most recent Final Environmental Impact Statements (FEIS) for the Central and Western Planning Areas, and by use of reference to related environmental documents. It presents site-specific data regarding the proposed structure removal activities and evaluates the potential impacts. Mitigation measures are contained in this document to lessen 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 AND NEED FOR THE ACTION

BP Exploration and Production Company proposes to non-explosively remove Platform A and A-Prod. in Eugene Island Area (South Addition) Area, Block 322, Lease OCS-G 02113. The structures are located at a water depth of 235 feet, and lie approximately 58 miles southwest from the nearest shoreline at Terrebonne Parish, Louisiana, and 90 miles southwest from Fourchon, Louisiana support base. The operator proposes to mechanically sever the piles and conductors at a mimimum depth of 85 feet below sea level and topple the structure in place as an artificial reef.. The maximum anchor radius on the platform barge will be 3,500 feet. (BP Exploration and Production Company 2003).

A discussion of the legal and regulatory mandates to remove abandoned oil and gas structures from Federal Waters can be found in the PEA. According to the operator, the structure is unsafe as the result of hurricane damage.

Since explosives will not be utilized during the proposed removal activities, MMS has determined that sea turtles and marine mammals will not be affected. A Section 7 Consultation under the Endangered Species Act, as amended, will not be initiated.

II. ALTERNATIVES TO THE PROPOSED ACTION

MMS initially discussed various structure-removal techniques in the Final Environmental Impact Statement (FEIS) for Proposed Oil and Gas Lease Sales 118 and 122 (USDOI, MMS, 1988) and in the PEA. Updated information is also found in the FEIS for Gulf of Mexico OCS Oil and Gas Lease Sales: 2 003-2007 (USDOI, MMS, 2002). Refer to the FEIS (USDOI, MMS, 1988 and 2002) and PEA for detailed

information concerning alternative methods of structure removal. Alternatives to the proposed structure removal with mitigation originally submitted are:

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 and easement. Therefore, non-removal is not an acceptable alternative.

B. REMOVAL OF THE STRUCTURE AS PROPOSED WITH ADDED MITIGATION

Measures that BP Exploration and Production Company proposes to limit potential environmental effects are discussed in the structure removal application incorporated herein by reference (BP Exploration and Production Company, 2003). Outer Continental Shelf Operating Regulations, Notices to Lessees and Operators, and other regulations and laws were identified throughout this assessment as existing mitigation for potential environmental effects associated with the proposed structure removal application. Additional information can be found in the PEA.

The operator will comply with NTL No. 2003-G11 Marine Trash and Debris Awareness and Elimination. It can be accessed on the web at: http://www.gomr.mms.gov/homepg/regulate/regs/ntlltl.html

The following mitigative measures will be included in MMS's approval of the proposed structure removal to ensure environmental protection, consistent environmental policy, and safety as required by the National Environmental Policy Act:

The operator will comply with NTL No. 2003-G10 Vessel Strike Avoidance and Injured/Dead Protected Species Reporting. It can be accessed on the web at: http://www.gomr.mms.gov/homepg/regulate/regs/ntlltl.html

III. ENVIRONMENTAL EFFECTS, SOCIOECONOMIC CONCERNS, AND OTHER CONSIDERATIONS.

In accordance with *The National Environmental Policy Act (NEPA) of 1969, as amended (Pub. L. 91-190, 42 U.S.C. 4321-4347, January 1, 1970, as amended by Pub. L. 94-52, July 3, 1975, Pub. L. 94-83, August 9, 1975, and Pub. L. 97-258, ∋ 4[b], Sept. 13, 1982)* and the Council on Environmental Quality (CEQ) implementing regulations (40 CFR Sec. 1502.15) *Affected Environment*, the following potential environmental effects were identified from the proposed action. Mitigative measures are included to eliminate or reduce the potential effect from the proposed activities to a level of insignificance as described in 40 CFR Sec. 1508.27

A. PHYSICAL ENVIRONMENT

A discussion of environmental geology, geologic hazards, meteorological conditions, physical and chemical oceanography, water quality and air quality can be found in the PEA. The proposed structure-removal activities are not in an area of sediment instability (mud flows, slumps, or slides). Potential impacts from the proposed activities to the physical environment have been considered, but were deemed insignificant (40 CFR 1508.27) and are not discussed in this SEA.

B. BIOLOGICAL ENVIRONMENT

A discussion of coastal habitats, protected, endangered and threatened species (birds, marine mammals, and sea turtles), and sensitive marine habitats are discussed in the PEA. The PEA delineates sensitive areas along the Texas coastline where whooping cranes and brown pelicans could be adversely impacted by structure-removal support activities. Since the operator will use a shore base in Fourchon, Louisiana, no impacts to these sensitive areas are expected.

A discussion of marine mammals occurring across the Gulf of Mexico (GOM) and an assessment of the potential impacts of structure-removal activities on marine mammals can be found in the PEA. Fritts et al. (1983) conducted aerial surveys across a 9,514 square-mile area of GOM waters. Results of these surveys indicate that the bottlenose dolphin is by far the most likely marine mammals to be encountered in the GOM. Since the proposed structure removal will not utilize explosives, no significant impacts are expected on marine mammals.

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. 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 1995) indicate that sea turtles may occur in the vicinity of the proposed activities and therefore could be impacted by the structure-removal operations. Definitive information on the probability of encountering sea turtles at the removal site during explosive operations is scarce. Since the proposed structure removal will not utilize explosives. No significant impacts are expected on sea turtles.

Other potential impacts from the proposed activities to the biologic environment have been considered, but were deemed insignificant (40 CFR 1508.27) and are not discussed further in this SEA.

C. OTHER CONSIDERATIONS

A discussion of socioeconomic, commercial and recreational fisheries, archaeological resources, military warning areas, explosive dumping areas, navigation and shipping areas, pipelines, cables, other mineral uses, and health and human safety can be found in the PEA referenced in the Introduction.

Other environmental effects have been considered, but potential impacts from the proposed activities were deemed insignificant (40 CFR 1508.27) and are not discussed further in this SEA.

MMS continues to consider the overall impacts of structure removals on commercial fishing to be low. MMS policy of encouraging an active rigs-to-reefs program will help to offset cumulative structure-removal impacts to fisheries resources.

D. UNAVOIDABLE ADVERSE IMPACTS

A discussion of unavoidable adverse impacts can be found in the PEA. Two areas of ongoing concern have been the potential impact to protected, threatened, and/or endangered species and potential loss of habitat to the marine environment. Both topics are discussed in the PEA and previously in this document. A more recent issue of concern has surfaced regarding the impacts of explosive structure-removals on reef fish stocks. Although the impacts to commercial and recreational fisheries are considered to be low, further studies information about this issue will be available in the future. 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. No public comments have been received regarding the proposed structure-removal operations.

V. CONSULTATION AND COORDINATION

In accordance with the provisions of Section 7 of the Endangered Species Act, as amended, the proposed structure-removal operations do not require coordination with NOAA Fisheries.

VI. BIBLIOGRAPHY AND SPECIAL REFERENCES

BP Exploration and Production Company 2003. Proposed OCS Platform Removal Application 03-199 and 200: Lease OCS-G 02113, Platforms A and A-Prod., Eugene Island Area (South Addition) Block 322, Offshore, LA.

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.

Gitschlag, Gregg R., 2000. Personal Communication Concerning a Cumulative Trip Report Summery of Marine Mammal Observations during Explosive Structure Removal Operations; November 1995 to November 2000. Information Transfer Meeting, New Orleans Hilton. December 7, 2000.

Teas, Wendy, G. 1995. 1994 Semi-annual Report of the Sea Turtle Stranding and Salvage Network. Atlantic and Gulf Coasts of the United States. January - June 1994. National Marine Fisheries Service. Southeast Fisheries Center, Miami Laboratory, 75 Virginia Beach Drive, Miami, FL.

U.S. Department of Commerce. NMFS. 1988. Biological Opinion Concerning Removal of Certain Outer Continental Shelf Oil and Gas Structures in the Gulf of Mexico. 11 pp. Gulf of Mexico OCS Region, New Orleans, LA.

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.

U.S. Department of the Interior. Minerals Management Service. 2002. Final Environmental Impact Statement. Gulf of Mexico Oil and Gas Lease Sales: 2003-2007: Central Planning Area Sales 185, 190, 194, 198, and 201; Western Planning Area Sales 187, 192, 196, and 200 Vol. I and II. OCS EIS/EA MMS 02-052. Gulf of Mexico OCS Region, New Orleans, LA.

VII. NEPA COORDINATOR AND PREPARER

Warren J. Barton – Environmental Scientist