

	Alaska Venture Maritime Safety
	Fuel Transfer Procedure

Document Approval Form

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Purpose	This document establishes operating criteria to ensure that fuel transfers termed as, vessel-to-vessel, vessel-to-MODU, and dock-to-vessel, conducted as part of Shell Upstream America's (UA) operations in the Alaskan Venture fully comply with port state regulation as well as Bureau of Ocean Energy Management requirements.

	Role/ Directorate	Name/Title	Signature	Date
Approve	Owner	UAD/L AK David George, Alaska Maritime Assurance Manager, , SME Maritime Safety	e-signature	11/24/2014
Concur	Custodian	UAD/L AK Robert Ring, Marine Contract Manager	e-signature	10/9/2014
Reviewed by		Tony Harris, Wells Operations Team Lead, Eric Whatley, Wells Operations Team Lead		

Change Log	Changes made in each revision of this Procedure and to the included Tables are recorded in the Change Matrix and located in the Administration file in the document suite.
Revision Authorizations	Minor revisions may be necessary to clarify document content, but must not be used to alter, add, or remove requirements set forth in a document. The revisions authorized by the signatures below are recorded in the Change Matrix. Documents start as Rev 0.0 and minor revisions are captured as Rev 0.1, 0.2 etc. A document changes to Rev 1.0 or Rev 2.0 and so on after major changes are made. A new Approval Form is required for all major changes.

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0.0	21 July 2009	Lynn Craddock-Melin	e-signature
1.0	7 April 2011	Lynn Craddock-Melin	e-signature
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Fuel Transfer Procedure

1 Introduction

1.1 Purpose

This document establishes operating criteria to ensure that fuel transfers termed as, vessel-to-vessel, vessel-to-MODU, and dock-to-vessel, conducted as part of Shell Upstream America's (UA) operations in the Alaskan Venture fully comply with port state regulation as well as Bureau of Ocean Energy Management requirements. This includes the practice of booming vessels engaged in fuel oil transfer operations. This document will be applicable to Shell Upstream America's Alaska (UAA) operations.

As fuel transfer operations present an elevated risk of fuel spills and potential environmental damage, it is imperative that transfer operations are conducted safely and that adequate response equipment is in place to provide for containment and recovery of any spilled fuel.

1.2 Applicability

This document will be applicable to all Shell Contracted vessels operating in UAA area of operations, involving shell contracted vessels and where local requirements apply.

The MMS Lease Stipulations for Oil and Gas Lease Sale 193 in the Chukchi Sea (Feb 6, 2008) include the following provision:

Stipulation No. 6 - Pre-Booming Requirements for Fuel Transfers. ... "The fuel barge must be surrounded by an oil-spill-containment boom during the entire transfer operation to help reduce any adverse effects from a fuel spill. The lessee's oil-spill-contingency plans must include procedures for the pre-transfer booming of the fuel barge(s)"

Note: The Mobile Offshore Drilling Unit (MODU), Polar Pioneer, a Semi Submersible type, does not present a contiguous waterline. This type of vessel requires cargo and fueling operations from dynamic positioned vessels (DP), both of these configurations preclude the use of encirclement booming or expandable booming modes as previously defined in Revision 2 of this document released for 2012 season.

As addressed in DOI/BOEM letter dated 12 JUNE 2012, Topic -Chukchi Sea EP Condition #14. BOEM reviewed and stipulated approval of Configuration 2, (Expandable booming deployed between both vessels.) This was accomplished with magnetic mounted anchors to each vessel. Though the course of operations in 2012 drilling season, operational experience in deployment of this method revealed that, 1 it was not effective, due to the presence of wave action, which frequently dislodged the boom from the hull of both vessels. Expandable boom is primarily used in conjunction with one stable object and a vessel, as in Dockside transfers. The following plans include the use of "J" configuration, aka Open Apex boom deployed from external vessels to those engaged in fueling or fully in accordance with the best means and practices approach to containment and recovery of spilled petroleum products upon the water, addressed in previously approved "Chukchi Sea Regional Exploration Program Oil Spill Response Plan". This provides the safest means to most proactively protect the environment through booming operations required in Stipulation 6 noted above. Additionally it should be noted that when Stipulation 6 was drafted the intention was to utilize a "Barge" for logistics fuel supply, however, in 2012 and currently the implementation of a fully capable self propelled tanker shall be used.



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1.3 Responsibility

- **Primary** – Shell Marine Manager shall be responsible for assuring that procedure is provided to operators and they are instructed to use this procedure prior to Fuel Transfer and Pre-Booming operations.
- **Secondary** - Vessel operators are required to perform Fuel Transfer and Pre-Booming Procedures in concurrence with this document.

1.4 Spill Response Team (SRT)

The Spill Response Team (SRT) is an UA assemblage of vessel and oil spill response assets including specifically trained individuals. In support of drilling operations this team will attend all fuel transfers that occur in UAA areas of operations. This team will provide appropriate material and manpower as required by this document and their operating procedures.

When a vessel is engaged in fuel transfer operations in areas other than UAA area of operations, the appropriate local, state and federal fuel transfer regulations shall be followed.

1.4.1. Booming of Dynamic Positioned vessels

Booming of DP Vessels shall be accomplished by using two response vessels to provide booming utilizing tactics outlined in the “Chukchi Sea Regional Exploration Program Oil Spill Response Plan” downrange of fueling evolution - within 600m.

1.5 References

Fuel Transfer Operations will comply with:

- MMG 6, §4.4, Bulk Transfer Operations
- MMG 6, § 4.4.2, Hose Marking and Use
- OPS0011 – Marine Transportation Standard
- OPS0011-PR06 – Bulk Transfer Requirements (attached)
- Alaska Venture MOPO – Manual of Permitted Operations
- OPS0055 – Lifting and Hoisting Standard
- 33CFR155 – Oil or Hazardous Material Pollution Prevention Regulations
- 33CFR156 – Oil or Hazardous Material Transfer Operations
- 46CFR35 – Tank Vessel Regulations
- OPS0011 – Dynamic Positioning Operations

2 Fuel Transfer Operations- Preparation

2.1 Scheduling/Notification

The scheduling of fuel transfer operations shall be initiated by the receiving vessel or MODU to Shell's SIMOPS Coordinator at least 24 hours in advance.

2.2 Requirements

Fuel transfer operations will follow Bulk Transfer Requirements (OPS0011 – PR06).

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**Fuel Transfer Procedure****2.3 SIMOPS**

The Simultaneous Operations (SIMOPS) Coordinator shall:

- Consider the proposed fuel transfer in the context of other planned operations and vessels in the area of operations,
- Review the weather forecast and ensure the forecasted weather is favorable for conducting a fuel transfer operation.
- Coordinate with Marine Activities Team Lead (MATL) for scheduling of the fuel transfer.
- Review and approve the voyage order from voyage control. "Notification of Planned Fuel Transfer Operation" form in (Appendix A) of this manual.
- Notify Shell Contingency Response Coordinator (Appendix D) of the planned fuel transfer.
- SIMOPS shall confirm MATL has notified United States Coast Guard Captain of the Port via telephone facsimile, no later than 4 hours, preferably 12 hours, in advance of all planned fuel transfers. (Appendix A) MATL shall email notification of Appendix A to Vessels, SIMOPS, Contract Holders, Voyage Control, Keep file copy.

2.4 Declaration of Inspection (DOI)

A copy of the Declaration of Inspection (DOI, Appendix C) completed by the Person in Charge for the delivery vessel and the Person in Charge for the receiving vessel prior to the fuel transfer shall be retained by both the delivering and receiving vessels. A complied copy of the fuel transfer data shall be transmitted to the SRT on the Oil Spill Response Vessel.

3 Fuel Transfer Operations (Other than in Chukchi and US Beaufort Seas)**3.1 Shore Side Facility**

A vessel transferring fuel at a shore side facility shall ensure booming material is appropriately deployed prior to commencing fuel transfer operations. Booming material should not be deployed until the vessel has been secured at the dock and finished with engines (FWE) has occurred. Due diligence to maintain a sufficient clearance of the propeller from the booming material shall occur at all times.

3.2 Scope

Prior to commencing fueling the following measures shall be taken by the two parties (delivery vessel/facility and receiving vessel/facility):

- Ensure all applicable fuel transfer equipment and procedures specified in 33 CFR 155 and 156 are complied with and the Declaration of Inspection (DOI) (copy in Appendix C) is signed.
- Confirm that the prevailing weather conditions will not prevent the deployment of spill containment boom. Reference to weather operation for fuel transfer is addressed in the Alaska Venture MOPO– Manual of Permitted Operations.
- Ensure communications are established between the transferring and receiving vessels or facilities.
- When transferring fuel to a Shell contracted vessel, the vessel shall not load any fuel tank in excess of 90% capacity.

**Fuel Transfer Procedure****4 Fuel Transfer Operations (Chukchi and US Beaufort Seas)****4.1 Scope**

Fuel transfers involving any vessel in the above mentioned locations will involve three entities: the receiving vessel, the transferring vessel and the Spill Response Team (SRT) vessel(s).

4.2 Spill Response Team (SRT)

At any time a fuel transfer is scheduled between two Shell contracted vessels, the SRT will be on scene to perform contingency response duties. If a transfer is scheduled to or from a Shell contracted vessel to or from a 3rd party vessel or facility, oil spill response equipment will be provided, including containment boom, as per appropriate port state regulations.

The SRT will be responsible for oil spill response equipment during all Shell contracted vessels fueling operations within the drilling area.

4.3 Defined Parties to Transfer Operation

Prior to commencing fuel transfer operations the following measures shall be taken by the three involved parties (delivery vessel, receiving vessel, and spill response team).

4.3.1. The Delivery Vessel and Receiving Vessel shall:

- Ensure all applicable fuel transfer equipment and procedures specified in 33CFR 155 and 156 and 46 CFR 35 are complied with and a Declaration of Inspection (DOI) is completed and signed. (Note: The vessels may use the Appendix C of this Manual or the vessel(s) specific DOI provided the document addresses all applicable requirements. In cases where the vessels engaged in the transfer use their existing DOI forms, the "Spill Response Declaration of Preparedness", a copy of which is provided in Appendix D, should also be verified as completed.)
- The transferring vessel's designated qualified Person in Charge shall ensure communications are established with the Person in Charge of the receiving vessel and the SRT.

4.3.2. The Spill Response Team will:

- Confirm that the prevailing weather conditions will not prevent the deployment of spill containment boom and oil recovery vessels from carrying out an effective response in the event of a spill.
- Ensure oil containment boom, anchors and spill response vessels are deployed as per the applicable boom deployment diagrams provided on the following pages.
- Ensure communications are established with spill response team vessel personnel as well as the transfer and receiving vessels.

4.4 Spill Response Equipment: When a fuel transfer occurs in the Chukchi and US Beaufort Seas.

Containment Boom: the Spill Response Coordinator shall determine the appropriate containment boom size based on local environmental conditions and in accordance with the "Chukchi Sea Regional Exploration Program Oil Spill Response Plan".

**Fuel Transfer Procedure****5 Termination of Fuel Transfer Operations and Related Spill Response****5.1 Reasons for Termination**

Any party involved in the fuel transfer operation, including the SRT, may call for halting the fuel transfer operation for safety or environmental reasons. If fuel transfer operations are halted, SIMOPS shall be notified immediately. Fuel transfers should be immediately terminated if a loss of primary fuel containment occurs or any of the other following situations develop.

5.1.1. A leaking pipe or hose is discovered.

5.1.2. The repositioning or resetting, or failure of the containment boom occurs due to weather conditions, current, ice, shifting of the vessels' relative positions or other factors.

5.1.3. Vessel cannot maintain position or DP system and or propulsion equipment fails.

5.1.4. Response equipment becomes unavailable.

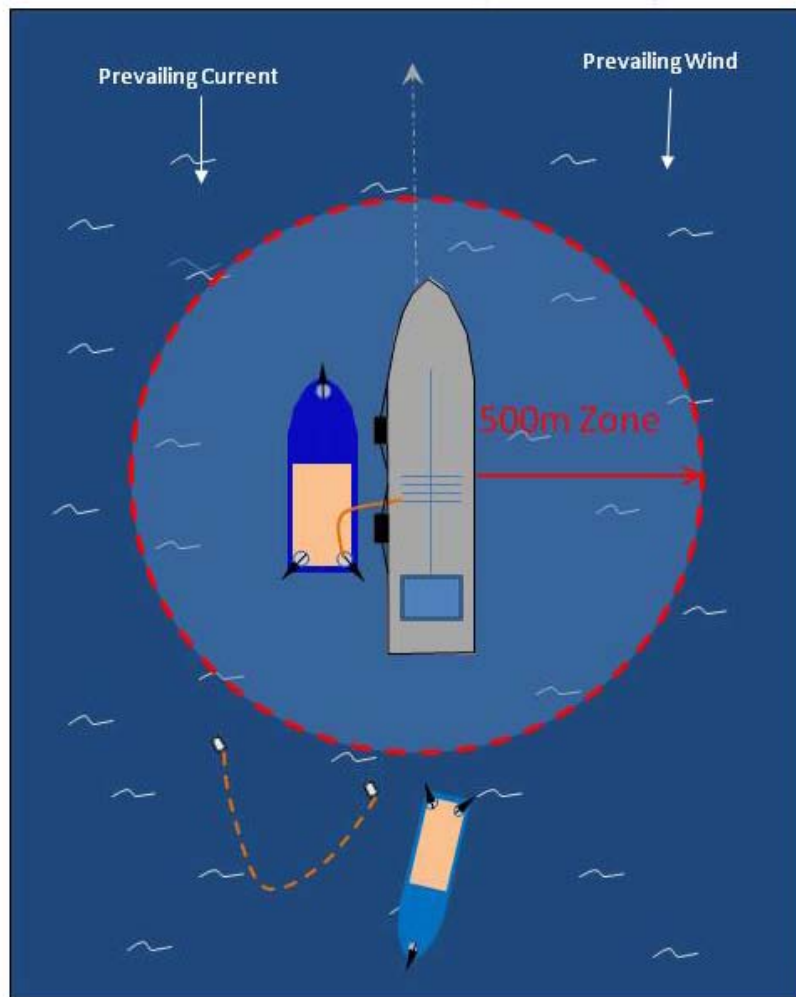
5.1.5. The presence of ice requires releasing the containment boom, preventing effective immediate spill containment.

5.1.6. Vessel moorings fail or are not adequately securing the vessels.

5.1.7. Other safety or environmental risk factors are elevated to an unsafe level.

5.1.8. Spill Response: Should oil spill occur to the deck or water the following measures shall be taken:

- Immediately stop the transfer and secure the source of oil
- Initiate spill response actions.
- Make notifications and carry out response in accordance with the approved vessel response plan and Shell's approved Beaufort and Chukchi Seas Regional Exploration Program Oil Spill Response Plans.

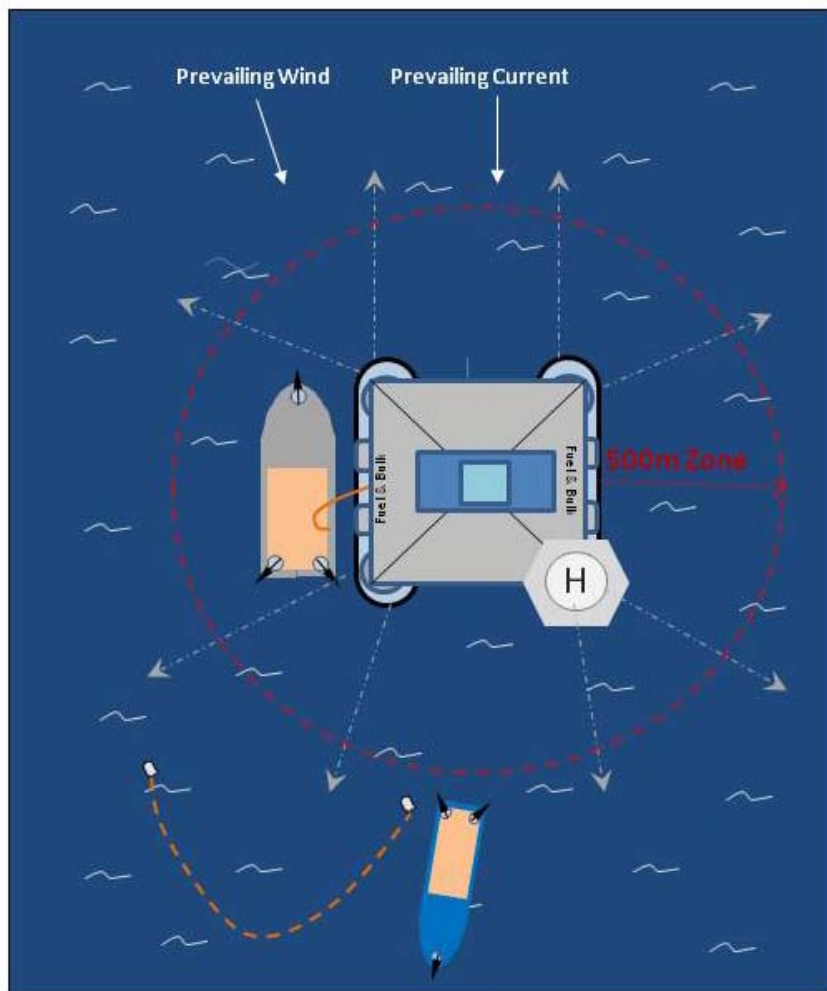
**Fuel Transfer Procedure****6 Layout Vessel to Vessel Plates Next PGS****6.1 Graphic A - Tanker****Tanker Fueling Plan Layout**

Graphic A

Offshore Supply Vessel in dynamic positioned mode (DP2) alongside Tanker inside 500m zone.

The Tanker is anchored with one ship's anchor laid out appropriately for water depth in the area between the Burger prospects. The Supply vessel is standing off in either dynamic positioned mode (DP2) or made fast to the tanker. Either activity shall have Yokohama fenders deployed. The Spill Response Vessel is down range of the Tanker.

Two Kvichaks stringing boom in an Open Apex or configured to best accomplish containment and recovery, using tactics as described in the "[Chukchi Sea Regional Exploration Program Oil Spill Response Plan](#)".

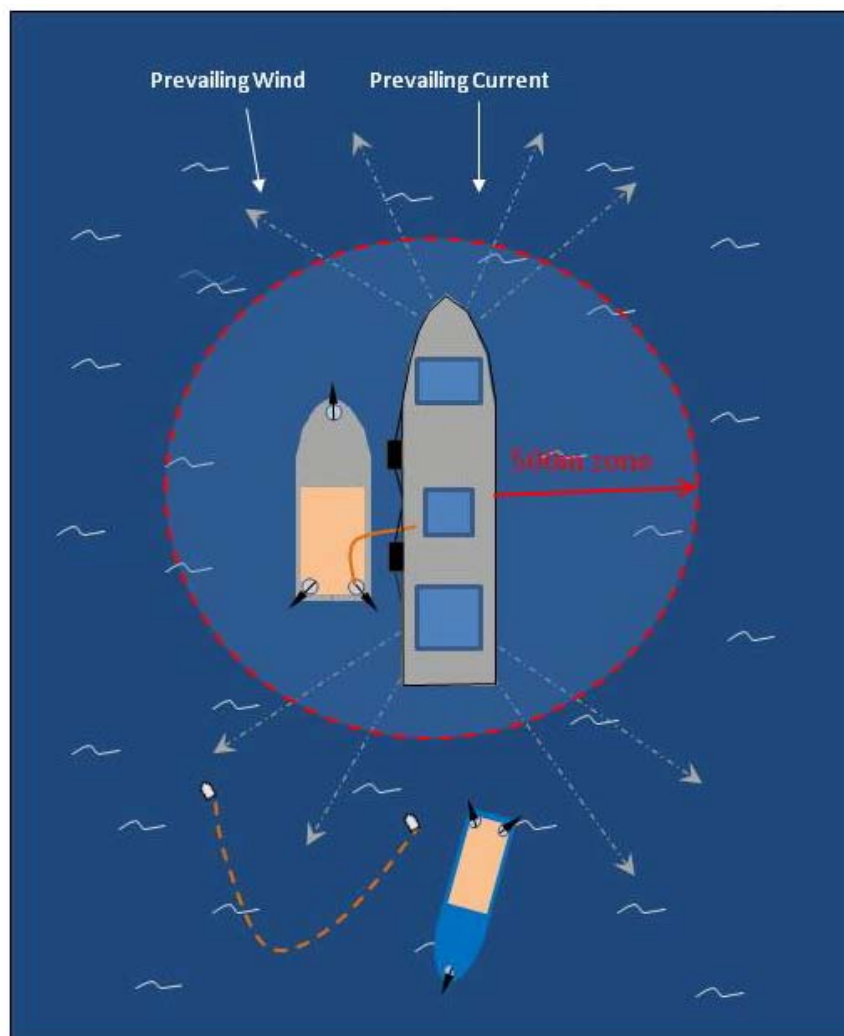
**Fuel Transfer Procedure****6.2 Graphic B – Semi-Submersible****MODU Semi Sub Fueling Plan Layout**

Graphic B

Offshore Supply Vessel in dynamic positioning mode (DP2) alongside Semisubmersible inside 500m zone.

The Semisubmersible is anchored on eight point mooring system over the well site. The Spill Response Vessel is down range of the Semisubmersible.

Two Kvichaks stringing boom in an Open Apex or configured to best accomplish containment and recovery, using tactics as described in the "Chukchi Sea Regional Exploration Program Oil Spill Response Plan".

**Fuel Transfer Procedure****6.3 Graphic C - Drillship****MODU Drillship Fueling Plan Layout**

Graphic C

Offshore Supply Vessel in dynamic positioned mode(DP2) alongside MODU Drillship inside 500m zone.

The MODU is anchored on an eight point mooring system fixed above the well site. The Spill Response Vessel is down range of the MODU. Two Kvichaks stringing boom in an Open Apex or configured to best accomplish containment and recovery, using tactics as described in the "[Chukchi Sea Regional Exploration Program Oil Spill Response Plan](#)".

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**Fuel Transfer Procedure****APPENDIX A – NOTIFICATION OF PLANNED FUEL TRANSFER OPERATION**

Proposed Date and Time of Fuel Transfer _____

Receiving Vessel: _____

Delivery Vessel: _____

Estimated Quantity of Fuel: _____ Gallons

Location: _____

Weather Conditions: _____

Weather Forecast: _____

Notifications:

Shell Contingency Response Coordinator: _____

Date/Time

Delivery Vessel: _____

Date/Time

Receiving Vessel: _____

Date/Time

*Note: U.S. Coast Guard Captain of the Port, Western Alaska (4 hours Advance Notice) PH: (907) 271-6700,
Fax (907) 271-6751 Advance Notification to U.S. Coast Guard – Offshore Fuel Transfer Operation (Appendix B)*

Notification Date/Time

Method: Fax/Call

USCG Point of Contact

Instructions: This Notification Form is to be completed by SIMOPS Coordinator, who maintains a file of Completed Forms.

**Fuel Transfer Procedure****APPENDIX B – ADVANCE NOTICE OF FUEL TRANSFER****Advance Notification to U.S. Coast Guard****Offshore Fuel Transfer Operation**

U.S Coast Guard: PH (907) 271-6700, Fax (907) 271-6751

To: USCG SECTOR WESTERN ALASKA, ANCHORAGE ALASKA
ATTN: PREVENTION DEPARTMENT**ADVANCE NOTICE OF FUEL TRANSFER****IN ACCORDANCE WITH 33 CFR 156.118**

Shell is required by 33CFR 156.118 to provide Advance Notice not less than four (4) hours prior to a fuel transfer taking place between a supply vessel and receiving vessel or drill rig in Alaskan Waters.

Accordingly, be advised that a fuel transfer is scheduled to take place between the following vessels in the Chukchi and Beaufort Seas as follows:

Date	Estimated Time	Vessels Involved	Location

Notice of transfer submitted by:

Name: _____ Phone Number: _____

E-mail: _____

**Fuel Transfer Procedure****APPENDIX C – DECLARATION OF INSPECTION****DECLARATION OF INSPECTION**

This document should be completed prior to the transfer of fuel to ensure BOEM Stipulation 6 of the Oil and Gas Lease Sale 193 and USCG Regulations in 46 CFR 25 and 33 CFR 155 and 156 are met.

DATE	RECEIVING VESSEL	SUPPLYING VESSEL	LOCATION

FUEL TO BE TRANSFERRED: Quantity: _____ Type of Oil: _____
I, _____, the person in charge of receiving vessel for the transfer of fuel in bulk certify I have personally inspected this vessel with respect to the requirement in 46 CFR 35, and 33 CFR 155 and 156 and that opposite each of the applicable items below I have indicated whether the vessel complies with all pertinent regulations by initialing the check off list below.

I, _____, the person in charge of supplying vessel for the transfer of fuel in bulk certify I have personally inspected this vessel with respect to the requirement in 46 CFR 35, and 33 CFR 155 and 156 and that opposite each of the applicable items below I have indicated whether the vessel complies with all pertinent regulations by initialing the check off list below.

Regulation Citation	Description	Supply	Receiving
46 CFR 35.35-30 (b)(1)	Warnings displayed (Bravo Flag; Red Lights)		
46 CFR 35.35-30 (b)(2)	No unauthorized repair work in progress (spark producing or Hot Work)		
46 CFR 35.35-30 (b)(3)	Flanged connections have a minimum of 4 bolts; fixed or portable containment in place.		
46 CFR 35.35-30 (b)(4)	Cargo connections made to receiving vessel and transferring vessel manifold.		
46 CFR 35.35-30 (b)(5)	No Fires or open flames present on deck or in adjacent compartment.		
46 CFR 35.35-30 (b)(7)	Sea Valves connected to Cargo Piping secured.		
46 CFR 35.35-30(b)(8)(9)	Boiler and Galley fires if any safely maintained.		
46 CFR 35.35-30(b) (10)(11)	Safe Smoking areas designated.		
46 CFR 35.35-30(b)(12)	Inert Gas System being Operated, If applicable		
46 CFR 35.35-30(b)(13)	Individual vessel response plans Reviewed		
33 CFR 156.120(a)	Moorings are adequate for all expected conditions		



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Regulation Citation	Description	Supply Vessel	Receiving Vessel
33 CFR 156.120(b)	Hoses have adequate operating envelopes for the given conditions and perimeters		
33 CFR 156.120(c)	Each Hose is supported to prevent kinking or other damage to the hose and strain on coupling		
33 CFR 156.120(d)	Each part of the transfer system is aligned properly.		
33 CFR 156.120(e)	Each part of the transfer system not necessary for the transfer operation is secured.		
33 CFR 156.120(f)	The end of each hose that is not connected for the transfer of fuel is blanked off using the Closure devices required by § 154.520 and 155.805 of 33CFR.		
33 CFR 156.120(g)	The transfer system is attached to a fixed connection on both vessels.		
33 CFR 156.120(h)	Each overboard discharge or sea suction valve that is connected to the vessel's transfer or Cargo tank system is sealed or lashed in the closed position.		
33 CFR 156.120(i)	Each Transfer hose has no unrepaired loose covers, kinks, bulges, soft spots, or defects which would permit the discharge of fuel through the hose material and no gouges, cuts, or slashes that penetrate the first layer of the hose reinforcement.		
33 CFR 156.120(j)	Each hose in use meets 33 CFR 154.500 and 154.510		
33 CFR 156.120(k)	Each connection meets 33 CFR 156.130.		
33 CFR 156.120(n)	The discharge containment required by 33 CFR 155.310, and 155.320 as applicable, is in Place and periodically drained to provide the required capacity.		
33 CFR 156.120(o)	Each drain and scupper is closed by mechanical means required by 33 DFR 155.310.		
33 CFR 156.120(p)	All Connections in the transfer system are leak free.		
33 CFR 156.120(q)	The communications required by 33 CFR 154.560 and 155.785 are in place with procedures Established and understood.		
33 CFR 156.120(r)	The emergency means of shutdown required by 33 CFR 155.780 is in position and operable.		
33 CFR 156.120(s)	There is a person in charge on each transferring and receiving vessel.		
**33 CFR 156.120 and BOEM	The person in charge of transfer operations on the transferring vessel, the person in charge of transfer operations on the receiving vessel and the person in charge of the oil spill response agree to begin the transfer operation.		
33 CFR 156.120(y)	Adequate lighting, including Vessel Manifold areas, is provided.		
***BOEM	Communications (2way) systems tested and ready.		
***BOEM	Booming response as per Chukchi Sea Regional Exploration Program Oil Spill Response Plan.		
***BOEM	Boom Tending capabilities present and ready to respond.		
***BOEM	Contingency Response Group Contacted and on standby		
***BOEM	Ice Conditions do not present an impediment to clean up operations.		
***BOEM	Wind and sea conditions do not present an impediment to cleanup operations.		



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Date and Time of Fueling Operations: Date _____ Start Time: _____ Completed: _____

Persons In Charge

Printed Name- Supply Vessel PIC

Printed Name – Receiving Vessel PIC

Signature

Signature

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**Fuel Transfer Procedure****APPENDIX D – CONTINGENCY RESPONSE TEAM / DECLARATION OF INSPECTION****Contingency Response Team / Declaration of Inspection.**

This Document should be completed prior to the transfer of fuel to ensure BOEM stipulation 6 of the Oil and gas lease sale 193 and USCG Regulations in 46 CFR 35 and 33 CFR 155 and 156

FUEL TO BE TRANSFERRED: Quantity: _____ Type of Oil: _____

I, _____, the person in charge of receiving vessel for the transfer of fuel in bulk certify I have personally inspected this vessel with respect to the requirement in 46 CFR 35, and 33 CFR 155 and 156 and that opposite each of the applicable items below I have indicated whether the vessel complies with all pertinent regulations by initialing the check off list below.

I, _____, the person in charge of supplying vessel for the transfer of fuel in bulk certify I have personally inspected this vessel with respect to the requirement in 46 CFR 35, and 33 CFR 155 and 156 and that opposite each of the applicable items below I have indicated whether the vessel complies with all pertinent regulations by initialing the check off list below.

Regulation Citation	Description	Supply Vessel/ Terminal	Receiving Vessel
*** BOEM	Communications (2 way) systems tested and ready		
*** BOEM	Booming provided for Receiving and/or delivering vessel arranged to comply with Chukchi Sea Regional Exploration Program Oil Spill Response Plan.		
*** BOEM	Boom Tending Capabilities present and ready to respond.		
***BOEM	SIMOPS Coordinator Contacted and SRT on Standby		
***BOEM	Ice Conditions do not present an impediment to cleanup operations		
***BOEM	Wind and sea conditions do not present an impediment to cleanup Operations.		

Date and Time of Fueling operation: Date _____ Start time: _____ Completed: _____

Persons In Charge

Printed Name- Supply Vessel/Terminal PIC

Signature _____

Printed Name – Receiving Vessel PIC

Signature _____

Printed Name- Contingency Response

Signature _____