SANTA CLARA UNIT (PLATFORMS GRACE AND GAIL) CONDUCTOR REMOVAL PROGRAM ENVIRONMENTAL ASSESSMENT (EA)

CHEVRON
Santa Clara Unit
Offshore Ventura County, California

FINDING OF NO SIGNIFICANT IMPACT

U.S. Department of Interior
Bureau of Ocean Energy Management
Bureau of Safety and Environmental Enforcement

May 2021

Summary

In accordance with the National Environmental Policy Act (NEPA), 42 USC 4261, et seq., the Council on Environmental Quality regulations at 40 CFR 1501, et seq., Department of the Interior (DOI) regulations implementing NEPA at 43 CFR Part 46, Bureau of Ocean Energy Management (BOEM) and Bureau of Safety and Environmental Enforcement (BSEE) policy, BOEM and BSEE prepared an Environmental Assessment (EA) on Chevron's proposal to remove 66 well conductors at two Santa Clara Unit oil and gas platforms (Grace and Gail). The Santa Clara Unit (Leases OCS-P 0217, OCS-P 0205), is in federal waters in the Santa Barbara Channel, Offshore Ventura County, California in the Southern California Planning area.

BOEM and BSEE prepared the EA to determine whether the Proposed Action may result in significant effects (40 CFR 1508.27) triggering additional mitigation to reduce such effects or the need to prepare an environmental impact statement. The EA analyzes the potential for significant adverse effects from the Proposed Action on the human environment, which is interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment (40 CFR 1508.13 and 1508.14). The EA was also prepared to assist with BOEM and BSEE planning and decision-making (40 CFR 1501.3b), namely, to help inform a determination as to whether the Proposed Action would cause undue or serious harm or damage to the human, marine, or coastal environment.

Based on the analysis in the EA, the BSEE and BOEM have determined that the Proposed Action is not a major federal action significantly affecting the quality of the human environment within the meaning of NEPA. Therefore, the preparation of an Environmental Impact Statement is not required and BSEE is issuing this Finding of No Significant Impact (FONSI).

Public Availability

The Final EA and FONSI will be posted to the project website at:
https://www.boem.gov/santa-clara-unit-well-conductor-removal

Background

BSEE's Pacific Outer Continental Shelf Region (POCSR) received technical and environmental information from Chevron in support of Applications for Permit to Modify (APMs) (30 CFR Part 250.1723) to initiate the removal of well conductors from the Santa Clara Unit Platforms Grace and Gale (Project). Platforms Grace and Gail are located on the outer continental shelf (OCS) of the Santa Barbara Channel (SBC) in the Southern California Planning area.

The Draft EA was released for a 15-day public review and comment period. The public was notified of the opportunity to provide comments on March 23, 2021. Three comments were received, and where appropriate, we modified/clarified the EA text.

BSEE, based on the review and findings incorporated within this EA, shall issue a FONSI and subsequent approval for the APMs to commence the removal of the well conductors at the Santa Clara Unit Platforms Grace and Gale. The EA includes an environmental and socio-economic analysis of the potential impacts from the proposed action on marine and coastal resources, and includes a no action alternative.

Alternative A: Proposed Action

Chevron proposed to remove 66 well conductors from the Santa Clara Unit Platforms Grace (38) and Gale (28). Removal would occur in one phase at each platform using abrasive and mechanical cutting methods. The conductor cutting and removal is targeted for Platform Grace in the third quarter of 2021 and Platform Gail in the second or third quarter of 2023. Removal at Platform Grace would take approximately 120 days (4 months), and removal at Platform Gail would take approximately 240 days (8 months). A more complete description of these activities is included in the EA.

Analysis of Significance of Potential Impacts

The EA describes the affected environment within the vicinity of the project area and the potential environmental impacts of the proposed action and alternatives. The potential impacts from the Project were all considered regarding each environmental resource within the context of anticipated well conductor removal activities.

The following discussion provides a summary of the potential impacts of the proposed action and alternatives and the reasons why these impacts would not be significant. A more complete analysis regarding impacts is contained in the EA.

Oil Spills

Well conductor removal activities will not begin until after all wells on a platform have been temporarily abandoned, per BSEE regulations, including an assessment of the wellhead and well

bore to ensure there is no pressure in the well. All process tanks and vessels will be flushed and purged. Therefore, oil could not be spilled from either of the two Santa Clara Unit platforms as a result of this proposed Project. If an oil spill to the ocean occurs from a vessel, Chevron will respond and assist the vessel in accordance with its agency-approved Oil Spill Response Plan for Pacific OCS Operations. Incident response procedures include mobilization of an Onsite Response Team at the platforms, and, if necessary, deployment of vessels from the on-site spill response organization (OSRO). Due to the short project timeframe, the lack of a source for a large oil spill, and the capability of an OSRO response to a spill of any size, no impacts from oil spills are expected and oil spills are not further analyzed in the EA.

Environmental Considerations

Air quality: Various Authority to Construct (ATC) permits and Permits to Operate (PTOs) have been issued by the VCAPCD regarding Santa Clara Unit ongoing activities and operations and may be further referenced by contacting VCAPCD offices. No modifications to existing permits are anticipated for this Project. The projected emissions are short term and not expected to result in exceedances of any Federal, state, or local air quality standards. The primary emissions associated with the proposed Project for both the Port of Long Beach (POLB) and Port Hueneme recycling scenarios would result from the vessel traffic between each platform. The vessel, together with the smaller crew boat that would be used, would be expected to comply with all applicable rules and regulations regarding fuel sulfur content, speed, and exhaust controls. Due to the short-term nature of the Project and the fact that diesel particulate matter (DPM) emissions would mostly occur offshore, Toxic Air Contaminants (TAC) emissions are not expected to be significant. Based on the projected emissions and the implementation of mitigation measures (Section 2.2.3 of EA), the potential impacts to onshore air quality from the sectioning and removal of the well conductors are expected to be temporary and minor. The potential impacts to onshore air quality resulting from the well conductor removal activities are expected to be within allowable emission levels currently permitted by the VCAPCD and South Coast Air Quality Management District (SCAQMD).

Water quality: Discharges of ungrouted abrasive fluid (seawater, abrasive materials, steel cuttings) are expected to occur intermittently for both platforms throughout the duration of the Project (120 days for Platform Grace, 240 days for Platform Gail). Abrasive fluid from the Project would be discharged in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Offshore Oil and Gas Exploration, Development, and Production Operations for Southern California (Permit No. CAG280000), which expired February 28, 2019, but conditions of the permit continue in force until a new permit is issued (40 CFR 122.6). Marine growth attached to the conductors would be removed and fall to the seafloor. This action may create turbidity in the water column from the biomass traveling to the seafloor and from the benthic sediments being disturbed by the deposition. These activities would cause a small increase in turbidity and impacts to water quality are expected to be short term and localized.

Benthic Resources: The well conductor removal activities would result in temporary sediment suspension, which would rapidly settle out of the water column within the general area of its origin. The reduction of ~17% of total surface area at Platform Gail and ~26% of total surface

area at Platform Grace may slightly reduce habitat for recruiting fishes and invertebrates. Impacts from the proposed Project are expected to be undetectable, temporary in duration, and confined to the area near the platforms, particularly as the total quantities to be discharged are substantially less than the annual NPDES permitted discharge amounts.

Fishes and Essential Fish Habitat (EFH): Potential effects to fishes and EFH from the Project are primarily expected to be either undetectable or temporary in duration, and within the local vicinity of the platforms. The permanent reduction in platform substrate may alter resident platform fish communities in the long term, but this is not expected to affect the viability of regional populations, and platform structure to be removed is not specifically designated as EFH or Habitat Areas of Particular Concern. Chevron has planned the Project to minimize adverse effects by avoiding anchoring activities and the use of explosives. The National Marine Fisheries Service was consulted and concurred that the proposed project will have no effect on EFH. Therefore, the activities associated with the proposed project are expected to be either undetectable or temporary in duration and within the local vicinity of the platforms and will not have significant impacts to fishes or EFH.

Marine mammals and Sea Turtles: The potential impacts to marine mammals from the proposed well conductor removal activities occur from noise and the risk of vessel strikes. After consultation with NMFS under the ESA, BOEM determined that the proposed Project, including mitigations, is not expected to add to current activities to the extent that marine mammals and sea turtles would be adversely affected. The proposed activities are anticipated to have a negligible impact on the marine mammals and sea turtles that occur in the action area, with no impacts to critical habitat.

Commercial Fishing: Chevron's proposal to remove conductor pipes at Platforms Grace and Gail is not expected to impact commercial fishing operations in the local area. Chevron would communicate with JOFLO to minimize any unforeseen conflicts that could arise during Project operations. Harvested fish populations are not expected to be adversely affected.

Socioeconomics: The Project is expected to increase economic activity, employment, and transportation. These impacts are likely to be negligible compared to the total economic activity, employment, and transportation occurring on a normal basis in the Project areas.

Environmental Justice and Tribes: The Project is not expected to result in disproportionately high adverse human health or environmental impacts on minority and low-income populations are not expected to have adverse effects on Tribes and Tribal activities in the proposed Project area.

Environmental Resources Not Included in the EA

A number resources did not warrant thorough review because potential impacts were not discernible or so minor that there was no potential for significance. Accordingly, these were excluded from the EA, consistent with the NEPA regulations pertinent to focusing on the most substantial issues and reducing discussion of other issues, at 40 CFR 1500.4 and elsewhere. The following resources were not included for analysis in this EA because BOEM determined that

they are not in the project area and/or would not be affected by the activities: Intertidal, Wetland and Shallow Subtidal Resources; MPAs, Sanctuaries, and Preserves; Cultural/Archeological Resources; Marine and Coastal Birds; Recreational Fishing.

Alternative B: **No Action**

This EA contrasts the impacts of the proposed action with the current and expected future conditions of the affected environment in the absence of the action, which constitutes consideration of a no action alternative (40 CFR Part 1501.4, 1502.14). Under this alternative, Chevron would not remove the well conductors and casings and therefore would not be able to conduct permanent well abandonment operations on Platforms Grace and Gail per BSEE regulatory requirements to remove the facilities at the end of their economic life. None of the impacts expected to result from the well conductor removal activities would occur. The purpose and need for the proposed action would not be achieved. Without the ability to remove the well conductors and casings, Chevron would not be able to fully decommission their facilities as is required under the OCS Lands Act. Thus, the removal of the well conductors and casings from Platforms Grace and Gail is a critical step to the full removal of the structure from the Federal OCS and decommissioning of the facilities at the end of their economic life.

No other alternatives were considered for this EA.

Finding of No Significant Impact

Based on the evaluation of Chevron's proposal and the potential impacts discussed in the attached EA, the BOEM in coordination with BSEE determined that concurrence with Chevron's conductor removal program (the Proposed Action) would not constitute a major Federal action significantly affecting the quality of the human environment pursuant to the National Environmental Policy Act §102 (2)(C) and therefore no further NEPA analysis or Environmental Impact Statement is required.

MARK FESMIRE Digitally signed by MARK FESMIRE Date: 2021.05.25 12:57:52 -08'00'

May 25, 2021

Mark Fesmire
Acting Regional Director,
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Date