



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT

Pacific OCS Region

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To: Necitas C. Sumait, Regional Supervisor
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From: Chima Ojukwu, Supervisor,
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RE: Completion of the Periodic Review Development and Production Plan for Platform Gilda

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Background

Under its regulations, the Bureau of Ocean Energy Management (BOEM) will periodically review the activities conducted under the approved Development and Production Plan (DPP) and may require operators to submit updated information on their activities. BOEM will base the frequency and extent of this review on the significance of any changes in available information and onshore or offshore conditions affecting or affected by the activities in the approved DPP.

BOEM Pacific Regional Office (BOEM Pacific) reviewed the DPP for the Santa Clara Unit (SCU) comprised of leases OCS-P 0215 and 0216. The SCU is produced from Platform Gilda and is operated by DCOR, LLC (BOEM Company No. LA 02531). This DPP review is pursuant to the Outer Continental Shelf Lands Act and the BOEM implementing regulations at 30 CFR § 550.284(a), which states, “The Regional Supervisor will periodically review the activities you conduct under your approved EP, DPP, or DOCD and may require you to submit updated information on your activities. BOEM will base the frequency and extent of this review on the significance of any changes in available information and onshore or offshore conditions affecting, or affected by, the activities in your approved EP, DPP, or DOCD.”

This memorandum provides the results of BOEM’s periodic review of the DPP for Platform Gilda.

Review Process and Determination

From August 2025 to present, BOEM Pacific identified and reviewed the DPP for Platform Gilda. The documents reviewed are listed below and each is further discussed in the following section.

1. “Programmatic Environmental Impact Statement for Oil and Gas Decommissioning Activities on the Pacific Outer Continental Shelf,” BOEM Pacific and Bureau of Safety and Environmental Enforcement (BSEE) Pacific Regional Office (BSEE Pacific) (October 2023 EIS No. 2023-0145) (Decommissioning PEIS).
2. Final Environmental Impact Report (EIR) for the Rincon Phase 2 Decommissioning Project, California State Lands Commission (CSLC), July 2024 (Final EIR for Rincon

decommissioning).

3. Requirements associated with oil spill blowout (30 CFR § 550.243(h)) and oil spill financial responsibility (OSFR) for offshore facilities (30 CFR Part 553) (Oil Spill Blowout and OSFR).
4. Letter titled “Periodic Review of Santa Clara Unit Development and Production Plans” from BSEE Pacific, August 26, 2025 (BSEE Pacific Inspection Result Letters).
5. Annual Plan of Operation (APO) provided to BSEE Pacific by SCU operators for every year between 2020 and 2025, including proposed unit development and operation activities.
6. “Offshore Oil and Gas Development and Production Activities in the Southern California Planning Area, Biological Assessment, Endangered and Threatened Species,” BOEM, September 2023 (2023 BA) and “Endangered Species Act Section 7(a)(2) Biological and Conference Opinion: Development and Production of Oil and Gas Reserves and Beginning Stages of Decommissioning within the Southern California Planning Area of the Pacific Outer Continental Shelf Region,” (consultation #2023-02183 issued on February 27, 2024 (2024 BiOp)).
7. "Offshore Oil and Gas Development and Production Activities in the Southern California Planning Area, Biological Assessment, Endangered and Threatened Species," BOEM, July 2025 (2025 BA) and "Biological Opinion on Existing Outer Continental Shelf Oil and Gas Development and Production Activities in the Southern California Planning Area, San Luis Obispo, Santa Barbara, Ventura, and Los Angeles Counties, California", USFWS, August 29, 2025 (2025 USFWS BiOp).
8. Other Information Reviewed.
 - A. “Programmatic Environmental Assessment of the Use of Well Stimulation Treatments (WST) on the Southern California Outer Continental Shelf,” BOEM Pacific and BSEE Pacific, February 2016 (PEA on WST).
 - B. Historical data for flaring and venting activity reported for the SCU (Flaring).
 - C. “Port Access Route Study: The Pacific Coast From Washington to California” (Docket No. USCG–2021–0345) as published by the United States Coast Guard (USGS), June 5, 2023 (PAC-PARS).
 - D. National Pollutant Discharge Elimination System (NPDES) Permit issued by the U.S. Environmental Protection Agency (EPA) (NPDES Permit).
 - E. “Worst Case Discharge Analysis (Volume I)” and “Oil Spill Response Equipment Capabilities Analysis (Volume II),” BSEE, February 29, 2016 (WCD Reports).

The review resulted in the following findings:

1. Revision to the Platform Gilda DPP is not required at this time.

Findings of Periodic Review of Platform Gilda DPP

1. Decommissioning PEIS.
 - A. No revision required to the Platform Gilda DPP due to the contents of this document. The Decommissioning PEIS is a programmatic document that does not prescribe outcomes; BOEM Pacific will conduct further project-specific environmental review when decommissioning applications are submitted to BSEE Pacific.
2. Final EIR for Rincon.
 - A. No revision required to the Platform Gilda DPP due to the contents of this document. The State of California's ongoing decommissioning efforts for oil and gas facilities in State waters are within the level of impacts analyzed in the original Platform Gilda DPP and the associated Final Environmental Impact Statement/Report (EIS/EIR). The decommissioning of Rincon analyzed in the EIR, and other reviews done by the CSLC, did not describe those actions as overlapping with the Platform Gilda DPP.
3. Oil Spill Blowout and OSFR.
 - A. Regarding oil spill blowout, BOEM Pacific reviewed requirements regarding Blowout Preventers (BOP), OSRP, and worst-case discharge (WCD) scenarios.
 - i. The approved WCD scenario from 2014 includes a statement that the Blow Out Prevention Equipment (BOPE) meets or exceeds the standards as defined in regulations 30 CFR Part 250.
 - ii. Per 30 CFR Part 254, BSEE Pacific reviews and approves OSRPs. BSEE approved the OSRP for the SCU as of August 7, 2025.
 - iii. The WCD scenario is comprised of three components: 1) topside discharge, 2) pipeline rupture, and 3) uncontrolled wellbore (blowout). BSEE Pacific is responsible for verifying the topside and pipeline rupture components of the scenario, while BOEM Pacific is responsible for calculating the blowout components. BOEM Pacific also reviewed the WCD Reports (*See 8(E) below*).
 - iv. The WCD for the blowout component has remained the same since first evaluated by Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE), a predecessor agency to BOEM, in 2011.
 - B. An operator is required to demonstrate OSFR for a Covered Offshore Facility based on a table matrix depicted in 30 CFR § 553.13(b)(1). The financial amount is based on a tiered WCD volume amount. As of August 11, 2025, BOEM has confirmed the SCU operator is in compliance with the OSFR coverage requirements.

- C. No revision required to the Platform Gilda DPP due to the contents of this document. BOEM reviewed oil spill blowout information in the DPP and found it compliant with the relevant BOEM regulations.
- 4. BSEE Pacific Inspection Result Letters.
 - A. To address concerns regarding the continued safe operation of the SCU Platform Gilda, BOEM Pacific made a request to BSEE Pacific, asking for a summarization of its inspection and testing program and for BSEE Pacific to indicate if the results of the SCU inspections and testing are in accordance with regulatory requirements.
 - B. BSEE Pacific's inspection results for the offshore pipelines associated with Platform Gilda and under BSEE jurisdiction are complete. BSEE Pacific provided a summary of inspection results for the Platform Gilda pipelines from 2024 and 2025. BSEE deemed all pipelines were in compliance with 30 CFR § 250.1005(a).
 - C. BSEE Pacific provided a summary to BOEM Pacific of the platform inspection program. At the time, Platform Gilda Level I-IV inspections for Platform Gilda were complete and deemed in compliance.
 - D. No revision required to the Platform Gilda DPP due to the contents of these documents. Currently, Platform Gilda has met all BSEE inspection requirements.
- 5. 2020 to 2024 APOs.
 - A. BOEM Pacific coordinated with BSEE Pacific to receive information about activities captured in the Annual Plans of Operation (APOs) for SCU to determine if any existing or currently planned future activities would trigger a revision of the approved DPP. An APO contains information about the planned operations of the Platform for the year.
 - B. No revision required to the Platform Gilda DPP due to the contents of these documents. BOEM Pacific determined the information provided in the APO does not trigger a DPP revision.
- 6. 2023 BA and 2024 BiOp.
 - A. BOEM's 2023 BA supported the 2024 BiOp and updated species information, potential oil spill trajectories, and information from nearby oil spills. The assessment included a discussion of physical and behavioral effects to endangered species from sound (noise), collision hazards, water pollution, and oil spills.
 - B. The 2024 BiOp with NMFS includes non-discretionary terms and conditions related to reporting. On November 20, 2024, BOEM Pacific notified all southern California operators of mandatory DPP revisions to incorporate the new terms and conditions described in the 2024 BiOp. This DPP revision added new reporting requirements related to vessel use and the unlikely event of a collision with marine wildlife. DCOR completed this mandatory revision in November 2024.

- C. No additional revisions required to the Platform Gilda DPP due to the contents of these documents.
7. 2025 BA and 2025 USFWS BiOp.
- A. The 2025 BA prepared by BOEM for the USFWS represents the most recent comprehensive review of present and future offshore O&G activities in the Southern California Planning Area (SCPA) and includes their assessment of potential effects on endangered and threatened species and their designated critical habitat under the USFWS jurisdiction.
 - B. The 2025 USFWS BiOp transmits the U.S. Fish and Wildlife Service's biological opinion (2025 USFWS BiOp) based on their review of BOEM and BSEE proposed authorizations of activities associated with the continued development and production of oil and gas reserves within the Southern California Planning Area and these proposed authorizations' effects on the federally endangered animals. The determination of the USFWS was "not likely to adversely affect."
 - C. No revision required to the Platform Gilda DPP due to the contents of this document. There are no terms and conditions in the 2025 USFWS BiOp that fall to the lessees. The terms and conditions present are actions for BOEM or BSEE. No actions are required from the operator requiring a revision to the DPP.
8. BOEM Pacific reviewed the following other sources of information:
- A. PEA on WST.
 - B. BSEE Pacific confirmed that no WSTs are underway or proposed in SCU.
 - C. No revision required to the Platform Gilda DPP due to the contents of this document. No revision to the DPP is required at this time because no WST is taking place or proposed at this time. If any lessee were to propose a WST that was not already a part of an approved DPP, the lessee would be required to provide an update to their DPP and BOEM Pacific would be required to conduct additional analyses under the National Environmental Policy Act to support any revised plan decision.
- B. Flaring.
- i. BOEM Pacific reviewed gas disposition volumes reported in thousand-cubic feet (MCF) via monthly Oil and Gas Operation Reports, type B (OGOR-B) (See 30 CFR § 250.1163 for reporting requirements). These monthly reports stored within the Technical Information Management System (TIMS) contain gas disposition as reported at the Unit Agreement level, which here is a sum of all the platforms in the Santa Clara Unit and the fields developed by each platform. Due to the way OGOR-B data is reported it is generally not possible to break out the gas disposition on a per-platform basis. Therefore, the individual contribution of Platform Gilda toward the Santa Clara Unit cannot be directly determined from

this data for the majority of the Unit operational period. This is because for the majority of the operational period gas disposition was a combination of three platforms, Gilda + Grace + Gail. However, because the Santa Clara Unit now only produces one oil and gas field, the Santa Clara Field, from one platform, Platform Gilda, OGOR-B gas disposition can now be used to determine gas flaring at the platform level.

- ii. No revision required to the Platform Gilda DPP due to the contents of documents reviewed. The DPP contains references to venting and flaring equipment as part of a pressure relief system. Therefore, the DPP recognizes the need for flaring but does not state any specific volume limits. Outer Continental Shelf (OCS) Environmental Assessments show the operational activities conducted for Platform Gilda was analyzed (1979-11 SCU Gilda Section 4.3.2 Air Quality). The air emission analysis showed emissions during the production phase of Platform Gilda operations were expected to be minimal. Peak flaring for the entire Santa Clara Field (i.e. the entire Santa Clara Unit, comprised of all the platforms operating at that time) occurred during 1989 at 1,890 MCF per day. Recent 12-month flaring for the entire Santa Clara Field can be attributed to only production from Platform Gilda. Flaring during this 12-month period was averaging 25 MCF per day. This volume is less than the volume flared during the peak period when all platforms were in operation. Flaring is within the limits assessed within the Platform Gilda DPP approval.
- iii. A review of information on the Ventura County Air Pollution Control District (VCAPCD) website shows approved permits to operate for the Platform Gilda in SCU. The permit for Platform Gilda (facility number 01492) can be viewed on the VCAPCD website here <https://fis.vcapcd.org/facilities>. Air quality impacts from flaring fall under the jurisdiction of the (VCAPCD), which receives its authority by delegation from the EPA. On September 4, 1992, the EPA Administrator promulgated requirements (40 CFR Part 55) to establish air pollution control requirements for permitting, monitoring, fees, compliance, and enforcement for OCS sources subject to the CAA. EPA delegated authority to the Ventura County Air Pollution Control District on January 27, 1994. Regulations at 40 CFR § 55.14 require OCS sources to comply with applicable onshore air quality rules in the corresponding onshore area when an OCS source is located at or within 25 nm from the State Seaward Boundary. Separate flaring and venting regulations are implemented by BSEE under 30 CFR § 250.1160 and 30 CFR § 250.1161. These regulations outline conditions when gas may be flared or vented, some of which require approval by the BSEE Regional Supervisor.

C. PAC-PARS.

- i. The U. S. Coast Guard (USCG) Traffic Separation Scheme (TSS) and proposed fairways take existing platform operations into consideration. The study established voluntary fairways for coastwise and nearshore vessel traffic to promote safety of navigation in the study area while the TSS is a specific area where vessel traffic is regulated to reduce the risk of collisions by separating opposing traffic flows.

- ii. No revision required to the Platform Gilda DPP due to the contents of this document. These requirements are voluntary, managed by USCG, and do not require changes to the DPP.

D. NPDES Permit.

- i. No revision required to the Platform Gilda DPP due to the contents of this document. Platform Gilda is permitted and covered under NPDES General Permit CAG280000 General Permit: Southern California Offshore Oil and Gas Exploration, Development and Production Operations. The permit establishes effluent limitations, prohibitions, reporting requirements, and other conditions on discharge from oil and gas facilities engaged in production, field exploration, developmental drilling, well completion, well treatment operations, well workover, and abandonment operations. The EPA issued NPDES General Permit CAG280000 on December 20, 2013; it is now expired. However, under 40 CFR § 122.6 an expired permit continues in force under 5 USC § 558(c) until the effective date of a new permit. BOEM Pacific is in communication with EPA as they work to re-issue the permit.

E. WCD Reports.

- i. Volume I, Worst Case Discharge Analysis, presents regional profiles regarding the range and type of WCDs associated with U.S. offshore drilling, and illustrates their potential for impacting the environment through oil spill fate and transport modeling. Volume II, Oil Spill Response Equipment Capabilities Analysis, presents a series of related analyses, including spill modeling using different response countermeasures, to reduce the potential for impacts, and develop recommendations for oil spill response plan requirements for all Regions within BSEE.
- ii. No revision required to the Platform Gilda DPP due to the contents of these documents. Oil spill blowout (30 CFR § 550.243(h)) and oil spill financial responsibility for offshore facilities (30 CFR Part 553) were considered and are compliant as discussed above (*See* number 3).

Recommended Next Steps

1. BOEM Pacific will notify the SCU operator that the review of the SCU DPP covering Platform Gilda is complete and that the review resulted in the following findings:

A. Revision to the Platform Gilda DPP is not required at this time.