SANTA YNEZ UNIT (PLATFORMS HONDO, HERITAGE, AND HARMONY) IMPRESSED CURRENT CATHODIC PROTECTION ANODE SLED ENVIRONMENTAL ASSESSMENT

EXXONMOBIL
Santa Ynez Unit
Offshore Santa Barbara County, California

FINDING OF NO SIGNIFICANT IMPACT

U.S. Department of Interior
Bureau of Safety and Environmental Enforcement

August 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, and Bureau of Ocean Energy Management (BOEM) and Bureau of Safety and Environmental Enforcement (BSEE) policy, BOEM and BSEE prepared an Environmental Assessment (EA) on ExxonMobil's proposal to place Impressed Current Cathodic Protection (ICCP) Anode Sleds at the Santa Ynez Unit (SYU) oil and gas Platforms (Hondo, Heritage, and Harmony). The SYU (Leases OCS-P 0180, 0181, 0182, 0183, 0187, 0188, 0189, 0190, 0191, 0192, 0193, 0326, 0329, 0461), is in federal waters offshore Santa Barbara, California, in the Southern California Planning area.

BOEM and BSEE prepared the Environmental Assessment (EA) to determine whether the Proposed Action may result in significant effects (40 CFR § 1501.5) 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 § 1508.1(m)).

Based on the analysis in the EA, BSEE has 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 EA and FONSI will be posted to the Project website at:
https://www.boem.gov/SYUEA_anodesledproject

Background

BSEE's Pacific Outer Continental Shelf Region (POCSR) received technical and environmental information from ExxonMobil in support of ExxonMobil's request for permission to perform platform repair (30 CFR Part 250.905) by installing ICCP Anode Sleds on SYU Platforms Hondo, Heritage, and Harmony (Project). Platforms Hondo, Heritage, and Harmony are located on the outer continental shelf (OCS) offshore Santa Barbara in the Southern California Planning area.

Because of the limited scope of activities and the fact that this type of Project has previously been implemented at this location, BOEM determined that no public review and comment period was warranted for this EA.

BSEE, based on the review and findings incorporated within the EA, is issuing this Finding of No Significant Impact (FONSI) and subsequent approval for the request to commence with the placement of ICCP Anode Sleds on the sea floor near the SYU Platforms Hondo, Heritage, and Harmony. The EA includes an environmental, environmental justice, 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

ExxonMobil proposed to place 21 Anode Sleds on the sea floor near the SYU Platforms Hondo (2), Heritage (10), and Harmony (9). Placement of the Anode Sleds would occur in one phase at each platform using ROV technology and an accompanying ship the *HOS Bayou*. The placement of the Anode Sleds is targeted for the fourth quarter of 2021 into the first quarter of 2022. The expected duration of the Anode Sled placement activities is four 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

The SYU Platforms are not currently producing oil. Therefore, oil could not be spilled from the three SYU Platforms because of this proposed Project.

Environmental Considerations

Air quality: Impacts to air quality from the proposed project are expected to be temporary and minor. Further, operations conducted onshore, on platforms, and at sea are expected to comply

with all state, local, and Federal air quality rules and regulations. Emissions are expected to be within allowable levels currently permitted under air permits issued to the three offshore Platforms involved in the Project.

Benthic Resources: Impacts from the proposed Project are expected to be short-term, localized, and confined to areas near the SYU Platforms. Benthic disturbance from the deployment of twenty-one anode sleds on the sea floor is unavoidable for the proposed action. The sea floor where the sleds will be located has been altered by the presence of drilling discharges and biota associated with the Platforms. Sediments will be temporarily disturbed by placing anode sleds on the sea floor and could cause physical irritation and clog feeding structures. It is anticipated that water column clarity will return to pre-Project conditions within hours of the disturbance and is comparable to the degree of turbid water that animals in this area experience from natural events. ExxonMobil's Project design and post-construction surveys will ensure that sea floor disturbance is minimized. The area modified by anode sled placement (1,344 ft^2; 410 m^2) and cable placement (1,700 ft^2; 518 m^2) will introduce low relief, hard substrate into an area that was originally unconsolidated sediment. This additional structure further modifies an area that is already disturbed by the presence of the SYU Platforms and represents no increase in the disturbed sea floor habitat of the Santa Barbara Channel.

Fishes and Essential Fish Habitat (EFH): The impact analysis for turbidity, Electromagnetic fields, and other factors is considered ongoing for proposed oil and gas activities in Federal and state waters, marine shipping, commercial fishing vessels, as well as the impact-producing factors associated with the proposed action. If any adverse impacts to EFH occurs from these factors, they are expected to be localized, negligible in intensity, and of short duration. The additional substrate of the anode sleds may recruit nearby fish communities similar to species near the base of the platform structures and nearby shell mounds, but this is not expected to affect regional populations. ExxonMobil has planned the Project to minimize adverse effects as listed above and primarily by avoiding anchoring activities. The Project proposed by ExxonMobil will have minimal adverse effects on fishes and EFH, and those that do occur will be temporary in duration.

Marine Mammals and Sea Turtles: The potential impacts to marine mammals from the proposed Project occur from the risk of vessel strikes. After consultation with National Marine Fisheries Service, 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 negligible impacts on the marine mammals and sea turtles that occur in the action area, with no impacts to critical habitat.

Marine and Coastal Birds: This Project will have minor impacts to marine birds overall, and no effects on federally listed species including the Short-tailed Albatross, California Least Tern, and Marbled Murrelet. Artificial lighting associated with night operations could attract marine birds to the Project area, several of which have special-status designations. The state listed Scripps's Murrelet could occur in the vicinity of the proposed Project and, if present, could be attracted to the area at night by Project-related lighting. However, based on the proposed mitigations to reduce the effects of artificial lighting on birds, including directing lights in a manner that limit ambient light into the environment, we believe that effects to the species will not be minor. If the Project occurs after the fledging dispersal period of the marine bird species breeding on the Channel Islands, the possibility of impacts from light attraction will be reduced further.

Commercial Fishing: ExxonMobil's proposal to install additional anode sleds at Platforms Hondo, Heritage, and Harmony is not expected to impact commercial fishing operations in the local area. ExxonMobil 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.

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

Environmental Resources Not Included in the EA

A number of environmental 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 Project activities: Intertidal, Wetland and Shallow Subtidal Resources; Marine Protected Areas, Sanctuaries, and Preserves; Cultural/Archeological Resources, Water Quality, Recreational Fishing, and Socio-economic considerations other than those described above.

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 §§ 1501.9(e)(2) and1502.14). Under this alternative, ExxonMobil would not place the Anode Sleds on the sea floor near the SYU Platforms and therefore would not be able to update and improve their electrical systems on Platforms Hondo, Heritage, and Harmony and eventually lead to degradation and unsafe conditions of the Platforms. None of the impacts expected to result from the Project activities would occur. The purpose and need for the proposed action would not be achieved. Thus, the placement of anode sleds on the sea floor near Platforms Hondo, Heritage, and Harmony is a critical step to maintain the full usefulness the structures.

No other alternatives were considered for this EA.

Finding of No Significant Impact

Based on the evaluation of ExxonMobil's proposal and the potential impacts discussed in the attached EA, BSEE finds that concurrence with ExxonMobil's ICCP Anode Sled Project (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.

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08/27/2021

For Michael Mitchell
Acting Regional Director,
Pacific OCS Region
Bureau of Safety and Environmental Enforcement

Date