



United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
PACIFIC OCS REGION
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010-6064

Jul 15, 2021

CERTIFIED MAIL
TRACKING INFORMATION: 70203160000201642752
RETURN RECEIPT REQUESTED

Mr. Alan C Templeton
DCOR, LLC
290 Maple Court, Suite 290
Ventura, CA 93003

Re: Platform Habitat and Associated Gas Pipeline Decommissioning Applications and
Permanent Well Plugging Applications for Permit to Modify

Dear Mr. Templeton:

As noted in our letter to you dated June 1, 2021, the Interior Board of Land Appeals has issued a decision affirming the September 16, 2016, Bureau of Safety and Environmental Enforcement (BSEE) determination that Leases OCS-P 0234 and OCS-P 0346 expired by operation of law on March 15, 2016. This decision resulted in dissolution of the stay of BSEE's determination and termination of the Pitas Point Unit. Accordingly, we write to reiterate the following obligations discussed in BSEE's previous letter to you dated September 26, 2016.

Platform Removal Application

According to 30 CFR 250.1 725(a)(c), you must remove all platforms and other facilities within one year after the lease or pipeline right-of-way terminates, unless you receive approval to maintain the structure for other activities; you must submit a final removal application to the BSEE Regional Supervisor for approval; and you must remove the platform or other facility according to the approved application. In light of the fact that production has already ceased from the Leases, which have expired, and you have not submitted an initial platform removal application, this final removal application is to be submitted within 120 days after your receipt of this letter, to the:

Regional Supervisor, Office of Strategic Operations
Bureau of Safety and Environmental Enforcement Pacific OCS Region
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010

Your application must be accompanied by payment of the service fee listed in 30 CFR 250.125. If you are proposing to use explosives, provide three copies of the application. If you are not proposing to use explosives, provide two copies of the application.

(The initial platform removal application, required under 30 CFR 250.1704 and 250.1726 to be submitted to BSEE, POCSR at least two years before production is projected to cease, is not applicable in light of the prior cessation of production and expiration of the Leases.)

The information to be included in the final platform removal application is specified at 30 CFR 250.1727 and listed below in abbreviated form for easy reference:

- A. Identification of the applicant, as specified in the regulation at 30 CFR 250.1727(a);
- B. Identification of the structure, as specified in the regulation at 30 CFR 250.1727(b);
- C. Description of the structure, as specified in the regulation at 30 CFR 250.1727(c);
- D. Description, including anchor pattern, of the vessel(s) you will use to remove the structure;
- E. Identification of the purpose of the removal, as specified in the regulation at 30 CFR 250.1727(e);
- F. Description of the removal method, as specified in the regulation at 30 CFR 250.1727(f);
- G. Your plan for transportation and disposal (including as an artificial reef) or salvage of the removed platform;
- H. If available, the results of any recent biological surveys conducted in the vicinity of the structure and recent observations of turtles or marine mammals at the structure site;
- I. Plans to protect archaeological and sensitive biological features during removal
- J. operations, including a brief assessment of the environmental impacts of the removal operations and procedures and mitigation measures you will take to minimize such impacts; and
- K. A statement whether or not you will use divers to survey the area after removal to determine any effects on marine life.

Pipeline Decommissioning/Removal Application

Pipeline decommissioning/removal requirements are at 30 CFR 250.1750 through 250.1754. Decommissioning pipelines in place is covered by 30 CFR 250.1750 through 250.1751. Removal of pipelines is covered by 30 CFR 250.1752. The regulations specify that pipeline decommissioning or removal applications must be submitted to BSEE for approval before the proposed activity is performed and identify the information to be included. Your application must be accompanied by payment of the service fee listed in 30 CFR 250.125.

Mr. Alan C Templeton

3

BSEE requests that you submit this application to the Regional Supervisor, Office of Strategic Operations, within 120 days after your receipt of this letter.

Permanent Well Plugging Applications for Permit to Modify

The regulations covering permanent plugging of wells are at 30 CFR 250.1710 -250.1716. In accordance with 30 CFR 250.1710, you must permanently plug all wells on a lease within one year after the lease terminates. The regulation at 30 CFR 250.1712 provides "[b]efore you permanently plug a well or zone, you must submit form BSEE-0124, Application for Permit to Modify" (APM) to BSEE and receive approval. The regulation sets out the content requirements for the required APMs.

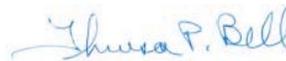
The APMs are to be submitted to the:

Regional Supervisor, Office of Field Operations
Bureau of Safety and Environmental Enforcement Pacific OCS Region
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010

The APM submittals may also be done via eWell.

If you have any questions, please contact me, or Dan Knowlson at (805) 384-6364 or via email at Daniel.Knowlson@bsee.gov.

Sincerely,



Digitally signed by
THERESA BELL
Date: 2021.07.15
14:43:34 -07'00'

Theresa P. Bell
Regional Supervisor
Office of Strategic Operations

cc: W. M. Templeton
Channel Islands Capital, L.L.C.
10455 Strait Lane
Dallas, TX 75229

Ms. Alison Dettmer, District Director
California Coastal Commission
45 Fremont Street #2000
San Francisco, CA 94105

Mr. Alan C Templeton

4

Marina Voskanian, P.E., Division Chief, Energy and Minerals Division
California State Lands Commission
200 Oceangate, 12th Floor
Long Beach, CA 90802