RECE JUN 07 2012



Shell Exploration & Production

Regional Dire⇔or, Alaska OCS Bureau of Ocean Energy Management Anchorage, Alaska

U.S. Department of Interior Bureau of Ocean Energy Management, Alaska Outer Continental Shelf Region Attn: David Johnston, Regional Supervisor, Leasing and Plans 3801 Centerpoint Drive, Suite 500 Anchorage, AK 99503-5820

3601 C Street, Suite 1000 Anchorage, AK 99503 Tel. (907) 646-7112 Email <u>Susan.Childs@Shell.com</u> Internet <u>http://www.Shell.com</u>/

June 6, 2012

Re: Fulfillment of Condition #11 of the Revised Outer Continental Shelf Lease Exploration Plan, Camden Bay, Alaska (Revised Camden Bay EP) Conditional Approval

Dear Mr. Johnston:

Shell Offshore Inc. (Shell) hereby submits the following document as fulfillment of condition #11 that the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE; now Bureau of Ocean Energy Management [BOEM]) conditioned approval of Shell's revised Camden Bay EP.

• <u>Condition #11</u> Shell provides a revised attachment where the revised Camden Bay EP is cited in the Supplemental Explanation of Shell's Alaska Fuel Transfer Procedures.

Shell asks that BOEM provide confirmation that condition #11 has been fulfilled.

If you have any questions regarding this submission, please contact me at (907) 646-7112 or <u>Susan.Childs@Shell.com</u>, or Pauline Ruddy at (907) 771-7243 or <u>Pauline.Ruddy@Shell.com</u>.

Thank you,

Sult

Susan Childs Alaska Venture Support Integrator, Manager

Attachments:

Condition #11:

a) Supplemental Explanation of Shell's Alaska Fuel Transfer Procedures (revised)

(ISVIS) SICS TO HUL

Regional Dire-tor, Alaska OCS Bureau of Ocean Energy Monagement Anchorage, Alaska

on Martin Alexandro de La Secolaria 1960: Martin Alexandro de Alexandro 1979: Alexandro de Alexandro de Martin 1979: Alexandro de Alexandro de Martin Martin Alexandro de Alexandro de Alexandro Martin Alexandro de Alexandro de Alexandro (1) Alignet series on terminal discontrational ender the competence of the contration of a competence of the contration of the series by a contration which is a spectrum to the series.

a de la serie a

A to a Confidence of Theory 2000 and the Product Energy Schola Evadore of Photo Evadore managements and a Charlen Photo Research and Campbace to 2000 (1990) (1990) (1990)

and decision of the

(i) Construction (British President) and que estimates (British). The confluence of the que of the destruction frequencies of queen Norregueses. The president of Heavier (British Restarce Press) and the queen freque of quick was presided by conditioner and the second of the second of quarkers are press.

, and 11,200 and 2,000 at the call of the call of the data of the state of the filled setting of the

o Bolyado e en a segar qua dibaja se addudaja das conditacienas o presentadorente cado de 1986, Adament 1976 de La preda adapte objecta prede addudate de concelor en administro do concelor de Hondrica, Bolyadorente

and the second antes a caso c an a shiri charlendi ku sheri shekari (12-12)

Sec. Sec. S. B.

出版:1999-1999-19

alisense i de la tradición de la complete presidente depois de tradeción que de

An ann a salaanna

Bureau of Ocean Energy Management April 25, 2012 Camden Bay EP Condition #11 Attachment A

Supplemental Explanation of Shell's Alaska Fuel Transfer Procedures April 2012

All fuel transfers between vessels will be conducted as per the *Alaska Fuel Transfer Procedure* (April 2011; Appendix M of the revised Camden Bay Exploration Plan). This document captures the US Coast Guard CFR requirements 33 CFR 155 and 156 including the Declaration of Inspection (checklist). This procedure is mandatory and includes the type of equipment, environmental parameters, personnel required and the specific activities to conduct the transfer safely and efficiently. The procedure covers all fuel transfers conducted by vessels employed by Shell Alaska.

In relation to the containment boom deployment the Shell procedures capture the 'in port' scenario as well as offshore operation where one vessel may be anchored. In relation to offshore operations the vessels will not be completely encircled by the containment boom. When offshore vessels are subject to variable wind direction and weather conditions, although the operation is managed in accordance with the procedures limiting the conditions in which the operation can be conducted, the presence of a containment boom completely encircling both vessels will restrict the vessels ability to maneuver, and would not be fully effective. The boom has a tendency to float close to the vessel side and would not be ideally placed to capture a spill. Any containment boom that is floating 'free' has the potential for entanglement with thrusters and propellers with the potential for damage. This could severely impact the vessels propulsion system and impair the vessels ability to maneuver out of danger. Damage to the containment boom and associated equipment (ropes, etc.) could occur.

In order to deploy the containment boom effectively the Shell procedures detail two configurations offshore (see Configurations 1 and 2 of the *Alaska Fuel Transfer Procedure* [April 2011; Appendix M of the revised Camden Bay Exploration Plan]) either the insertion of boom between the vessels or the deployment of small boats controlling a deployed boom held in a 'J' configuration.

The placement of boom between the vessels has the following advantages:

- Any spill is captured in the small area between the vessels
- The short sections of boom are relatively quicker to deploy and can be effectively retained in position and managed during the operation.

The 'J' configuration has the following advantages:

- The boom is actively positioned aligned close down stream of the potential spillage
- The use of small vessels to position the boom and the associated team are on immediate standby to intervene and commence recovery
- No danger of entanglement with propellers and or thrusters which would impair the vessels ability to maneuver.
- Due to the variable direction of the vessels heading the boom/containment is more effective by being kept at a distance of 20ft minimum from the vessels.